



December 17, 2024

Via email

Suzanne Wilson
General Counsel and Associate Register of Copyrights
Library of Congress
U.S. Copyright Office
101 Independence Avenue S.E.
Washington, DC 20559-6000

Re: Summary of the *ex parte* meeting between the Copyright Alliance and the U.S. Copyright Office on the NPRM relating to Access to Electronic Works

Dear Ms. Wilson,

This letter summarizes the December 16, 2024 *ex parte* meeting (“December 16 Meeting”) that occurred via Zoom videoconference between the Copyright Alliance and representatives of the U.S. Copyright Office (“Copyright Office”) regarding the [Notice of Proposed Rulemaking](#) (“NPRM”) regarding Access to Electronic Works [Docket No. 2023-3] dated September 1, 2023.

Representatives participating in the December 16 Meeting on behalf of the Copyright Alliance were Keith Kupferschmid, CEO, and Rachel Kim, VP, Legal Policy and Copyright Counsel. Representatives participating in the meeting on behalf of the Copyright Office were Suzanne Wilson, General Counsel and Associate Register of Copyrights, Brandy Karl, Assistant General Counsel, Laurie Ann Taylor, Attorney Advisor, Robert Kasunic, Associate Register of Copyrights and Director of Registration Policy and Practice, and Erik Bertin, Deputy Director of Registration Policy and Practice.

The Copyright Alliance restated its views that various statutory and regulatory changes would be necessary to effectuate an expansion of access to electronic deposits of copyrighted works received by the Copyright Office and selected by the Library through Section 408 of the Copyright Act while also expressing general support for the Copyright Office and Library of

Congress's transition to an electronic-preferred system. The Copyright Alliance again stressed the need for clarity in the scope and implementation of a new rule establishing such a system and voiced concerns more generally with regard to policies related to the handling of electronic deposits in the future.

The meeting concluded with the Copyright Alliance reiterating that it and its members remain ready and available to engage in further conversations with the Copyright Office and that that it may follow up in January with proposed suggested changes to section 202.18 that would address the intent of the rule while also including necessary safeguards in the regulations.

Sincerely,

A handwritten signature in black ink, appearing to be 'K. Kupferschmid', written over a light gray rectangular background.

Keith Kupferschmid
CEO
Copyright Alliance
1331 F Street, NW, Suite 950
Washington, D.C., 20004