



**BEFORE THE  
U.S. COPYRIGHT OFFICE**

**Group Registration of Newspapers**

**Docket No. 2017-16**

**COMMENTS OF THE COPYRIGHT ALLIANCE**

The Copyright Alliance appreciates the opportunity to submit the following comments in response to the U.S. Copyright Office's Notice of Proposed Rulemaking on Group Registration of Newspapers, published in the Federal Register on November 6, 2017.

The Copyright Alliance is a non-profit, non-partisan public interest and educational organization representing the copyright interests of over 1.8 million individual creators and over 13,000 organizations in the United States, across the spectrum of copyright disciplines. The Copyright Alliance is dedicated to advocating policies that promote and preserve the value of copyright, and to protecting the rights of creators and innovators. The individual creators and organizations that we represent rely on copyright law to protect their creativity, efforts, and investments in the creation and distribution of new copyrighted works for the public to enjoy.

The Copyright Alliance endorses the comments submitted by our member the News Media Alliance and joins in applauding the Copyright Office for its proposal permitting broader group registration for newspapers and accepting deposits in PDF format rather than microfilm. We also applaud the Copyright Office for working with groups like the News Media Alliance on improving registration and deposit processes and addressing issues specific to certain types of works or industry sectors. We encourage the Copyright Office to continue such efforts.

Respectfully submitted,

Keith Kupferschmid  
Chief Executive Officer & President  
Copyright Alliance  
1331 H Street, NW, Suite 701  
Washington, D.C., 20005