



June 17, 2024

The Honorable Bryan Steil, Chairman  
Committee on House Administration  
1309 Longworth House Office Building  
Washington, DC 20515

The Honorable Joseph Morelle, Ranking Member  
Committee on House Administration  
1216 Longworth House Office Building  
Washington, DC 20515

Dear Chairman Steil and Ranking Member Morelle:

Copyright Clearance Center (CCC) welcomes the invitation to submit written testimony to the Committee on House Administration for the June 26, 2024 hearing on “The U.S. Copyright Office: Customers, Communities, and Modernization Efforts.”

**About CCC.** As the primary collective management organization for text in the United States, CCC has more than forty years of expertise in copyright and information management. Standing at the nexus between content producers and users, CCC has successfully developed global licensing and content delivery offerings on behalf of text publishers and licensees. We offer global corporate licensing on a fully voluntary, non-exclusive basis, plus academic licensing services on a similar basis primarily within the United States. Our offerings are always market-based.

As has been noted, the U.S. Copyright Office is a critical lynchpin in the American innovation economy and needs to function at its best for our creative communities to thrive. For years, CCC has been engaged in communications with the Copyright Office on the topic of modernization and our Managing Director of Business Development has served as a member of the Copyright Public Modernization Committee since its creation.

**The Committee has asked us four questions.**

“Specifically, we are interested in your perspective on the following issues:

1. The efficiency and effectiveness of the U.S. Copyright Office’s registration processes, particularly for the average small business owner who may be utilizing the process.
2. The responsiveness of the Office to creators’ needs and inquiries.
3. Any challenges or obstacles your organization or members have encountered when interacting with the Office.
4. Suggestions for improvements to enhance the Office’s operations and support for creators.”

**Answers.** CCC has no experience relevant to the first two questions, and answers only questions 3 and 4.

**Question 3. [Are there any challenges or obstacles your organization or members have encountered when interacting with the Office.**

CCC has experienced no challenges or obstacles when interacting with the Copyright Office. By contrast, we find the Copyright Office acts professionally and is always responsive to us.

**Question 4. [Do you have suggestions for improvements to enhance the Office's operations and support for creators.**

We note first that the Library of Congress and Copyright Office are currently engaged in modernization efforts and we applaud the progress made thus far.

As a future step for enhancing operations and supporting creators, we recommend that the Copyright Office amend its online registration forms to enable and encourage the use of industry adopted standard identifiers and related metadata. We also recommend that the Copyright Office enable API access to the registration process in order to enable registration in other industry workflows.

The creative industries have developed numerous standards and identifiers to ease identification, licensing, disambiguation, and commerce. These standards have a wealth of related metadata and today are the catalysts for copyright-based commerce. If attached to a registration, the standards and accompanying metadata would make the registration more valuable.

Additional data fields for standard numbers and other identifiers should therefore be included in newly-designed, expanded registration forms, although the inclusion of data for any such fields must be optional. In other words, the use of identifiers should be enabled and encouraged through APIs and other means, but lack of a standard identifier should never be treated as impeding a valid registration.

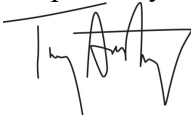
Simply to illustrate the power of combined metadata, let's look at an abbreviated sample use case: Imagine a published book author goes to register a copyright and types in her book's ISBN. The system would automatically bring in all related metadata, including the author's name, the title, the US publisher, certain other publication information, and all related ISBNs (e-book, soft cover, large print, etc.). The author could (and should be encouraged to) provide additional information, including her ISNI, which then brings her professional credentials into the system, and ensures disambiguation from others with the same name. With API connections between the Office's registration systems and the ISNI and ISBN databases, interaction among them would have the "intelligence" to know when the author publishes a new book and could push out a registration reminder if the author opts in to such a service.

These enhancements would provide multiple entry points for users to find works and creators, enabling licensing or other business transactions, diminishing the number of orphan works, and minimizing infringement. APIs, metadata, and identifiers would be maintained and developed by the private sector without cost to US taxpayers.

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Were the Copyright Office to establish and publicize the availability of appropriate APIs, applications for copyright registrations could be built into creators' and publishers' existing workflows. This would encourage, for example, application for a copyright registration to occur in the same workflow that a photographer would use to register for a PLUS number. This could be done either from the Copyright Office site or the PLUS site (and ideally both). In this way, the registration process would meet creators where they are. The Copyright Office would need to build these workflows. Rather, the Copyright Office should create a framework which enables others to do so. Many more works are today registered for identifiers than for copyrights. If the Office makes it easy to add some data and make a payment during works registration processes, the number of registrations should increase along with the value thereof.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tracey L. Armstrong', written over a horizontal line.

Tracey L. Armstrong  
President & CEO