**2024 Special 301 Out-of-Cycle Review of Notorious Markets: Request for Comments
(Docket No. USTR-2024-0013)**
October 2, 2024

The Association of American Publishers (AAP) provides this submission in response to the request for comments in the 2024 Special 301 Out-of-Cycle Review of Notorious Markets by the Office of the U.S. Trade Representative (USTR).

The Association of American Publishers (AAP) is the national trade association of the U.S. book and journal publishing industry. AAP represents the leading book, journal, and education publishers in the United States on matters of law and policy, advocating for outcomes that incentivize the publication of creative expression, professional content, and learning solutions. The U.S. publishing industry supports an extensive network of American businesses and thousands of jobs, with revenue of $29.9 billion for 2023.[1] The publishing industry is also an integral part of the broader U.S. copyright industries, which collectively added more than $1.8 trillion in annual value to U.S. gross domestic product in 2021.[2] Beyond these important economic contributions, an independent and thriving publishing industry supports the nation's political, intellectual, and cultural systems.

As called for in the request for comments, this submission identifies online sites that traffic in infringing copies of books and journal articles, to the detriment of U.S. publishers and the authors, writers, editors, illustrators, researchers, and scholars whose creative works and scholarship publishers curate and bring to market.

The issue focus for the 2024 Notorious Markets List examines "online pharmacies and counterfeit medicine." While the publishing industry cannot speak directly to this issue, the mechanisms that should be in place to better mitigate harms that may arise from the sale of counterfeit or diluted medicines through unregulated online pharmacies will also be useful to preventing trafficking in other counterfeit and infringing products on e-commerce marketplaces. For instance, online marketplaces should adopt, through either voluntary mechanisms or through legal requirements (1) mandatory verification of vendor identities (i.e., "know your business customer" policies); (2) adopt and strictly enforce a repeat infringer policy to ensure that previously identified bad actor vendors are not able to continue to sell potentially counterfeit or pirated goods; (3) require vendors to document and track sources of the goods offered through their store front and to produce relevant documentation when requested by the marketplace or a rights holder; and (4) adopt procedures that track or flag sellers with goods from locations with a known history as a source of counterfeit goods.

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[1] https://publishers.org/news/aap-statshot-annual-report-publishing-revenues-totaled-29-9-billion-for-2023/

[2] *Copyright Industries in the U.S. Economy: The 2022 Report,* by Robert Stoner and Jéssica Dutra of Economists Incorporated, prepared for the International Intellectual Property Alliance (IIPA), (December 2022). https://www.iipa.org/files/uploads/2022/12/IIPA-Report-2022_Interactive_12-12-2022-1.pdf.

We appreciate the efforts of USTR and the inter-agency subcommittee to encourage U.S. trading partners to adopt measures to address commercial piracy and counterfeiting, whether occurring online or in physical markets.

Online platforms make available, without the permission of or compensation to publishers, unauthorized, infringing copies of books (consumer trade, professional books, and textbooks) and journal articles. These platforms include online distribution hubs ("cyber lockers"), auction sites, P2P technologies, apps, ecommerce platforms or marketplaces, social media platforms, and other online services that facilitate access to pirated copies of books and journal articles. Unfortunately, the infringing activity occurring on some of these platforms is supported, sometimes unwittingly, by third-party service providers such as hosting providers, payment processing services, advertising networks, domain name registrars, and content delivery networks (CDN). While some platforms assist rights holders in mitigating the availability of infringing content, many continue to hamper the ability of rights holders to take effective action against the infringing activity occurring on their sites or through their services.

Below, AAP identifies sites and services that provide or facilitate access to significant volumes of unauthorized copies of books and journal articles, infringing on the intellectual property rights of authors and publishers. Though some sites respond to take down notifications, removing or disabling access to infringing content, the problem of the same infringing content being re-uploaded to the site persists. The most egregious sites routinely ignore take down notifications from publishers regarding infringing material available on its site.

Notorious Online Sites and Marketplaces

Afkebooks.com — The site engages in the sale of unauthorized PDF copies of textbooks in the sciences, from nursing and obstetrics to psychology and psychiatry. The site launched in 2013 and appears to be operated from Iran. While some AAP members have sent takedown notifications to the site, it remains non-compliant and continues to provide infringing PDF copies of medical textbooks. The site is hosted by IWS Networks (*https://www.iws.co*), which remains unresponsive to rights holder takedown notifications. The site averages 22,449 visits a month, with U.S. traffic at 33% according to Similarweb.com.

Alibaba (Taobao and Goofish) — Infringing PDF copies of books, counterfeit books sold individually or in bulk, leaked exam papers and test banks continue to be available through the site. The expeditious takedown of infringing content remains challenging as rights holders are required to submit detailed reports including supposed piracy indicators, which is difficult as product listings are deliberately vague to avoid enforcement. In addition, the site requires rights holders to register each title with the site, including providing copyright registration and ownership information—further encumbering what should otherwise be an expeditious process of reporting infringing conduct.

Anna's Archive (.org/.gs) **—** is described as a metasearch engine and claims to provide access to the pirated copies of books and journal articles available on Sci-Hub, Library Genesis, Z-Library, and other piracy sites. As of 2024, the site operates under several domain extensions, including ***.org, .se, and .li***, with earlier domains such as ***.gs*** being suspended due to legal action.

The group also maintains a blog (annas-archive.org/blog/). The site's creators/operators claim that in addition to mirroring the infringing repositories of books and journal articles on notorious sites (Sci-Hub, Libgen, and Z-Library), they also "scrape" "closed" and protected" sites "in order to 'liberate' their books." The operators sought to raise $20,000 to cover operational costs as well as ongoing and future projects, accepting donations in cryptocurrencies (Bitcoin, Ethereum, Monero, Solana) as well as PayPal, Alipay (China), and Pix (Brazil). An analysis of their cryptocurrency wallets revealed a total of $29,596.21 in funds received as of July 2023.

Annas-archive.org is hosted by Epinatura LLC (using Cloudflare) in Ukraine, while *annas-archive.li* is hosted by Alexhost SRL (using Cloudflare) in Moldova. *Annas-archive.se* is hosted by Virtual Systems, LLC (using Cloudfare) in Ukraine. In addition, Anna's Archive is using the domain registration services provided by Sarek Oy and "Njalla" (1337 Services) to mask its identity. *Annas-archive.org* typically racks up to 17 million (up 5 % from last year) total monthly visits, with U.S. traffic accounting for 22% of global traffic, according to SimilarWeb.com. *Annas-archive.se* attracts 2.4 million total monthly visits, with U.S. traffic share at 22%. *Annas-archive.li* averages 1.3 million monthly visits, with U.S. traffic share of 26%, according to SimilarWeb.com.

Avaxhome — is a piracy network, operated from Europe, that provides unauthorized access to a significant volume of infringing eBook content. Sites in the Avaxhome network also provide links to unauthorized music, TV series, anime, video, software, magazines (adult content), comics, newspapers, games, graphics, vinyl & HR, audiobooks, and sheet music — the nature and scale of infringing activity extending across multiple industries. Several sites in the Avaxhome network (*avxhome.se*, *avxhome.unblocked.ist*, *avxhome.in*, *avaxhome.unblocker.xyz*, *avxhm.se*) were the subject of a site-blocking order in the United Kingdom.[3]

The Avaxhome group of sites currently use Bitcoin (BTC) to receive donations via a rogue third-party service, freewallet.org[4]. The piracy sites that are part of the network also link to premium accounts on cyberlocker hosts (e.g., icerbox.com), which increase the download speed. Twenty-seven (27) Avaxhome feeder sites[5] were identified as linking to infringing copies of eBooks. The sites are hosted with multiple hosting providers in Europe, which continuously change due to the enforcement efforts of publishers. The Avaxhome piracy network attracts over two million cumulative total visits. The U.S. appears to be among the top countries with respect to user traffic.

Libgen.rs (also *libgen.is; libgen.st; library.lol; Libgen.li; Libgen.rocks; Libgen.gs– for IPFS content*) and its multiple mirror sites (collectively the **Library Genesis Project**) **—** is a network of infringing locker sites, believed to be operated from Russia. The infringing network hosts a vast repository of infringing content — from consumer trade books, scientific, technical, and medical (STM) journal articles, technological standards, magazine articles, comic books to scholarly materials. It remains among the most problematic piracy sites plaguing the trade, education, and journal publishing sectors. Libgen boasts that it hosts 2.4 million non-fiction books, 80 million

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[3] https://www.blocked.org.uk/legal-blocks/order/22
[4] https://freewallet.org/id/888870a3/btc
[5] A feeder site identifies download links to copyrighted content hosted elsewhere e.g., cyberlocker hosts.

science magazine issues, 2.2 million fiction books, 2 million comic strips, and magazine articles,[6] which content is also being made available through multiple mirror sites and IPFS public gateways.

Libgen.rs' current Similarweb global ranking is 6,335 with an average of 7 million site visits a month, with the U.S. having the highest number of site visitors at 32%. The Libgen collection of sites averages some 50 million sites visits per month, with average U.S. site traffic at 27%—the highest traffic to the site. The many mirror sites are hosted by the following ISPs: Epinatura LLC (193.218.118.42), UA – via Cloudflare; PRIVATE LAYER INC (179.43.151.123), UA; ALEXHOST SRL (176.123.8.53), MD – via Cloudflare; Alibaba (US) Technology Co., Ltd. (8.209.105.148), US – via Cloudflare.

Over the years, several mirrors in the network have been subject to lawsuits or applications for site blocking orders. In 2015, publishers obtained an injunction under Section 97A of the UK Copyright, Designs and Patent Act (1988) to compel UK service providers to block access to the Libgen-related sites, and which continue to be subject of a blocking order. Some of the site's mirrors are also subject to blocking orders in Belgium, Denmark, France, Germany, Italy, Portugal, Russia, Spain, and Sweden. In November 2022, U.S. law enforcement seized over two hundred Z-library mirrors.[7] Z-Library is among the more notoriously known Libgen mirrors, though its reach had grown dramatically, along with the volume of infringing books in its repository. Several more Z-Library domains were seized in May 2023.[8] Following the piracy group's failure to respond to a lawsuit[9] brought by four education publishers against the site in 2023, the district court in the Southern District of New York granted the plaintiffs' motion for default judgment, holding Libgen liable for $30 million in damages, as well as issuing an injunction order that would enjoin third party service providers from continuing to provide support to the site.[10]

The group is reported to have received a total of $265,000 in donations and other contributions. Showing that many of these sites are likely acting in concert, the founder of Library Genesis reportedly donated $10,000 to the piracy site *Anna's Archive* in October 2022.

Notorious piracy networks such as Libgen and Z-Library are already exploiting public gateways within the InterPlanetary File System (such as *ipfs.io; gateway.pinata.cloud; dweb.link; crustwebsites.net; ipfs.slang.cx*) to host and distribute copyright protected content in a decentralized manner. Though intended to provide a resilient and more secure infrastructure, the platform is unfortunately exploited by networks like Libgen to facilitate large scale piracy. While IPFS gateways are responsive to individual reports of infringement, preventing notorious piracy networks, such as Libgen, from exploiting their services would greatly improve enforcement efforts.

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[6] See https://iteducationcourse.com/how-to-download-from-libgen/.
[7] See Eastern District of New York | Two Russian Nationals Charged with Running Massive E-Book Piracy Website | United States Department of Justice; also, FBI takeover Zlibrary BookTok Erupted - The Washington Post
[8] See U.S. Hits Z-Library with New Domain Name Seizures * TorrentFreak.
[9] See Textbook publishers sue 'shadow library' Library Genesis over pirated books | Reuters.
[10] See U.S. Court Orders LibGen to Pay $30m to Publishers, Issues Broad Injunction. (Torrent Freak)

Nitroflare.com — provides free file hosting and sharing services. Nitroflare's current Similarweb ranking is 14,016. U.S. traffic accounts for approximately 10% of the visits and the service has an average of 5.3 million visits per month globally. The domain was registered in 2014, and its current hosting provider is GLOBALLAYER B.V. (IP:213.152.167.194), NL via Cloudflare.

Rapidgator.net — provides free file hosting and sharing services. It advertises features such as "extra fast downloads" and "unlimited file storage." The site also advertises an affiliate program through which users earn money for uploading files. Rapidgator's current Similarweb ranking is 2,014 with an average of 29 million sites visits per month. The service is most popular in Japan (42%), with the highest combination of visitors and page views for the site, followed by the U.S. (9%). The domain was registered in 2010, and its current hosting provider is Melbikomas UAB (195.211.222.2)

Sci-hub.se (also *sci-hub.ru*; *sci-hub.st*), first encountered in May 2013 (as Sci-Hub.org) **—** continues its flagrantly infringing conduct, facilitating unauthorized access to over 88.34 million journal articles and academic papers (at least 90% of all toll access journal articles published). Sci-Hub obtains infringing copies of publishers' copyright protected works by illegally accessing the computer networks of universities, using hijacked proxy credentials (through which university personnel and students remotely access the university's intranet systems and databases). Once the site operator gains access to the database, it harvests articles and stores the purloined articles on its own servers, while also posting these articles to other piracy sites, including Libgen and Z-Library mirrors.[11] The site and its operator are in Russia and continue to operate with impunity. Though the site operator claims to have no knowledge of illegal tactics used to deceive legitimate subscribers into disclosing their personal credentials, there have been reported incidences of students and academic personnel, at university institutions whose systems have been compromised, being subjected to phishing schemes. According to the Scholarly Networks Security Initiative, Sci-Hub has compromised the networks and data of "over 400 universities and institutions across 41 countries."[12] The threat is not just to the security of university networks, or the personal data of personnel and students. As noted above, the site also poses potential damage to the research process, as the site operators have no incentive to ensure the accuracy of the articles posted to the site, which may have been subject to correction, modification, or retraction. The site continues to solicit donations from users, accepting a variety of cryptocurrencies.[13]

ISPs in Belgium, Denmark, France, Germany, Italy, Portugal, Russia, Spain, and Sweden are required to block access to the site, per injunctions secured by a group of scientific, technical, and medical (STM) journal publishers. The site remains the subject of a site blocking application in

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[11] See Petition launched for Z-Library restoration; Sci-Hub founder expresses support - The Hindu.
[12] See https://www.snsi.info.
[13] See https://sci-hub.se/donate#:~:text=Since%20the%20very%20beginning%20Sci,running%20by%20donating%20small%20sums.

India, which continues unresolved.[14] AAP member publishers, ACS and Elsevier, secured default judgments against Sci-Hub and its operator in 2017 and 2015 in the U.S., resulting in injunctions requiring U.S. domain name registries to suspend the site's U.S. administered domains.

Despite being an adjudged piracy site, Sci-Hub's operations remain active, in large part due to the difficulty of addressing online entities located in non-IP friendly jurisdictions. It is telling that the site's illegal activity has been the subject of warnings issued by law enforcement agencies.[15]

Shopee — an online (e-commerce) marketplace popular in several markets in Southeast Asia (Indonesia, Malaysia, the Philippines, Singapore, Thailand, Taiwan, and Vietnam) and which also operates in Brazil, Chile, Colombia, and Mexico. The site provides third-party sellers the platform through which to post listings of products they sell, from clothing to electronics, but, unfortunately, also counterfeit and pirated copies of academic textbooks and English-language teaching materials.

Unfortunately, like other ecommerce marketplaces, verification of third-party seller information is inadequate, and sellers already subject of an infringement report can continue to sell counterfeit products, including books, and pirated copies of ebooks on the platform. While reporting mechanisms are available, the process is cumbersome and though links to infringing product(s) subject of rights holder notifications are removed, there appear to be no actions taken against the sellers subject of the notifications. These sellers can post new links to the same infringing ebooks or counterfeit books that have already been the subject of prior notifications.

***Uploadgig*.com —** provides free file hosting and sharing services. The service offers faster downloads with "premium" accounts and promotes a "partner" program where users can earn money by importing and sharing files. The services receive approximately 1.5 million visitors a month and is most popular in Japan, with 32% of the site's traffic, while the U.S. traffic accounts for 7%. The domain was registered in 2015, and its current hosting provider is LidVPS (IP:45.133250.2), NL.

Other Services

Read Online Sites — are platforms that provide the text of an ebook to be viewed or "read" online. "Read online" sites are supported by ads served up by Google Ads, Microsoft Advertising, Steepto, and MGID. As "read online" sites are optimized to allow for "viewing" or "reading" on mobile devices, these sites reach more consumers than sites optimized for desktop or laptop devices given the ubiquity of mobile devices through which infringing works can be accessed without having to download the work. This type of online book piracy is particularly problematic as it significantly increases enforcement costs for publishers. In the "read online" scenario, the

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[14] On December 24, 2020, the site operator committed to the court (essentially enjoining itself) that there would be no uploads of new articles until the court rules upon the application. . However, on September 5, 2021, the operator uploaded 2,337,229 new articles to the site.

[15] See Police warn students and universities of accessing an illegal website to download published scientific papers | City of London Police.

infringing content is displayed across several linked pages on a website. For the typical download site, one takedown notification will address a complete work. In contrast, for a "read online" site, a takedown notification must be sent for every online page (i.e., every URL) associated with a single title. As such, hundreds of takedown notifications will be necessary to remove access to a single work, and thus, thousands of notifications by a publisher for the many copyrighted works they protect. Examples of such sites include *full-english-books.net* (IP: 37.1.203.18 ISP: iroko.net) and *novel22.net* (IP: 94.242.50.39 ISP: veesp.com). Others include: *graycity.net* (registered 2018, using Google ad choices to serve ads, hosted by Shinkiru Technology Snd Bhd – SHINJIRU-MY), which appears to be part of a group of related read-online sites, *bookfrom.net*; *archive.bookfrom.net; readfrom.net; efrem.net; and ereads.net* — all of which use the same IP and hosting address (IP: 101.99.94.14; ISP: Shinjiru.com.my). Combined these sites receive more than seven million visits per month.

In the past year, the ***ldoc.pub*** network of read online sites, operated from Vietnam, has grown in prominence, amassing some six million visits per month. 90% of the sites in the network use Cloudflare to mask their underlying IP addresses and are hosted by OVH SAS or IncogNET LLC. Further, numerous sites in the network also use Google AdSense services to generate revenue from advertisements placed on the site.

Audio Book Piracy Sites — Over the last two years, the publishing industry has seen a significant increase in the number of online sites dedicated to audiobook piracy. While there are U.S. platforms that are still a prime source of unauthorized copies of audiobook files, there has also been a considerable increase in stand-alone sites that rely on a few central servers of their own for serving-up pirated audio book files. These stand-a-lone sites are largely non-compliant with take down notifications. Some offer downloads while others only provide files in streaming format, while still others also offer pirated ebooks for download alongside audiobook files. Akin to "read online" piracy sites described above, audiobook sites are predominantly accessed on mobile devices making their reach much broader than traditional desktop webpage-based piracy. The sites are often optimized for mobile and streaming making them appealing to a wider audience. Below is a sampling of the most problematic audiobook piracy sites, and the problem only continues to grow.

ipaudio.club - 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL), this site serves as a file host for the following audiobook piracy sites:

- *dailyaudiobooks.co* - 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL), with 225,000 average monthly traffic, and the U.S. accounting for 64% of the traffic;
- *dailyaudiobooks.com* - 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL), with 12,258 average monthly traffic, and the U.S. accounting for 38% of the traffic;
- *findaudiobook.com* - 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL)- with 8,974 average monthly traffic, and the U.S. accounting for 65% of the traffic;

- *sharedaudiobooks.com* - 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL), with 40,751 average monthly traffic, and the U.S. accounting for 68% of the traffic;
- *sharedaudiobooks.net* - 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL), with 837,058 average monthly traffic, and the U.S. accounting for 56% of the traffic; and
- *bigaudiobooks.club* - 31.24.251.108 - BitWeb LLC - bitweb@abuse.network (FR), with 12,400 average monthly traffic, and the U.S. accounting for 38% of the traffic.

The *ipaudio* cluster hosts its repository of infringing audiobook files at the following domains: *ipaudio6.com* - 5.253.86.235 - ColocationX Ltd. - abuse@colocationx.com (NL); *ipaudio4.com* - 5.253.86.235 - ColocationX Ltd. - abuse@colocationx.com (NL); *ipaudio3.club* - 31.24.251.108 - BitWeb LLC - bitweb@abuse.network (FR); and *ipaudio5.com* - 193.142.146.53 - ColocationX Ltd. - abuse@colocationx.com (NL).

Finally, in addition to the above cluster of audiobook piracy sites, the following sites (all hosted by Cloudflare) are likewise problematic examples of this type of piracy:

- *galaxyaudiobook.com* - Host IP: 185.224.82.115 - Abelohost BV, - abuse@colocationx.com (NL), with 1,300,000 average monthly traffic, and the U.S. accounting for 44% of the traffic;
- *goldenaudiobooks.com* - 5.253.86.235 - ColocationX Ltd. - abuse@colocationx.com (NL), with 36,200 average monthly traffic, and the U.S. accounting for 56% of the traffic;
- *goldenaudiobook.co* - 5.253.86.235 - ColocationX Ltd. - abuse@colocationx.com (NL), with 140,000 average monthly traffic. The U.S. accounts for 1% of the traffic, with the Germany at 99%;
- *audiobookslab.com* - 37.221.67.146 - Alexhost Srl - noc@alexhost.com (Moldova), with 105 average monthly visits, and the U.S. accounting for 18% of the traffic; and
- *tokybook.com* - 37.128.205.120, SIA VEESP (veesp.com) (LV), with 1,642,000 average monthly site traffic, and the U.S. accounting for 18% of the traffic (India tops the list at 42% of traffic).

Telegram — an instant messaging app, is now a platform of choice for pirates, with private groups linked to public channels and Telegram bots used to automate requests for and downloads of content. The app is projected to have over one billion total subscribers in 2024, and currently has more than 700 million monthly active users.[16] While the platform has a copyright infringement reporting mechanism, it lacks a comprehensive approach to mitigating the rampant piracy facilitated by the private groups operating in violation of the platform's policy guidelines. Further, the encrypted nature of the platform presents significant enforcement difficulties for penetrating the private groups dedicated to distributing infringing content. Notorious piracy networks (such as Z-Library) have established Telegram bots and channels to distribute copyrighted content or provide links to piracy sites hosting and disseminating pirated materials.

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[16] See [90+ Telegram Statistics In 2023 (Updated) (demandsage.com)](#).

An increasing number of Telegram groups and channels are involved in hosting or distributing copyrighted materials, with some engaging in crowdsourcing copyrighted content from users with institutional access. The trend of crowdsourcing copyrighted content has gained prominence with private groups on the platform, where users actively participate in requesting and sharing copyrighted materials. Despite this problematic trend, Telegram has not implemented adequate measures to effectively enforce its policies and address the infringing activities occurring within private groups or those related to linking to public channels. While the platform's adherence to privacy and security has been lauded, it is failing to adequately address the infringing activity occurring via the app. The piracy activity is often evident, as infringers openly promote their private groups across various social media platforms and encourage other users to join them. The platform should take meaningful action to address the issues of crowdsourcing, linking, and Telegram bots, including adapting and adjusting policies to confront these challenges effectively.

1337 Services (Njalla) — the service, founded by The Pirate Bay co-founder Peter Sunde and based in Nevis, acts as an intermediary for domain name registration purposes. Clients utilize the service to procure and "own" domain names on their behalf, providing the client with anonymity by obscuring the identity of the actual domain owner. The service is widely utilized by piracy sites such as Z-Library.se, Sci-Hub.se, Libgen.se, and Annas-Archive.org, and now hosts some 100 publishing-related piracy sites.

Rogue Hosting Providers — offer support to the large piracy networks engaged in criminal copyright infringement. These providers are typically uncooperative, often disregarding requests for assistance from rights holders, even law enforcement agencies. Not only do rogue hosting providers take pains to remain oblivious to the activities of the entities to which they provide services, some may purposefully create conditions that facilitate unlawful activity, such as spamming, phishing, malware distribution, hacking, and piracy.

Problematic hosting providers include:

Contabo.com/en — located in Germany and provides hosting services to, among others, https://gradespush.com/; https://www.intereseducation.com/; and https://papacambridge.com/home/index.html, and routinely ignores takedown notifications received from rights holders.

Epinatura, LLC (Ukrainian Data Network; *www.urdn.com.ua*) — located in Ukraine and known for providing services to Libgen and Anna's Archive.

Incognet.io — provides hosting services to https://dokumen.pub/ and https://vdoc.pub/. While the platform does not respond to rights holder notifications, its website notes that takedown notifications are forwarded to the website owner.

IP Volume Inc. (aka FiberXpress B.V.; Nogovara, DataOne B.V., Incrediserve Ltd., REBA Communications, B.V. at *www.ipvolume.net*) — located in The Netherlands and providing services to the Libgen network.

Virtual Systems LLC (OWL Protect EOOD, www.vsys.host) — with operations in Amsterdam and Ukraine, it began providing hosting services to Z-Library after November 2022 (following seizure the site's many mirrors) and to PDFDrive (*pdfdrive.com*, *zlibrary.to*).

Verdina/IWS Networks — This network hosts a cluster of websites that provide links to pirated copies of books, most in PDF format. Unfortunately, publisher requests for assistance to address the rampant piracy being facilitated through the websites are typically ignored. The sites are hosted by IWS Networks (abuse@iws.co), a company registered in Armenia. The transit provider is Verdina Ltd, with servers located in Bulgaria, although the company is registered in Belize. Verdina Ltd does not conduct any know-your-business-customer due diligence during customer registration and promotes its services on underground forums.

Conclusion

Publishers — in trade, education, and STM publishing sectors — are vital contributors to the U.S. economy, bringing to market engaging, entertaining, and educational content and creative expression to readers of all types. However, industrial scale infringing activity facilitated by piracy sites and networks, and the rogue platforms that provide services to these pirate actors harms not just publishers and their authors, but all who are involved in the publication of a book or journal article, including editors, researchers, illustrators, and other publishing industry personnel. Cross-border collaboration between and among governments, and with rights holders remains critical to address the nature and scale of today's online piracy more effectively.

AAP and its members support and appreciate the efforts of the U.S. government to identify and highlight notorious markets that traffic in infringing content and counterfeit products, whether in physical markets or online. The protection and enforcement of copyrights is essential to the continued viability of the U.S. publishing industry, and the publishing industry encourages continued collaboration with U.S. trading partner economies to address the borderless nature of online piracy more effectively.

Sincerely,

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