BEFORE THE

U.S. COPYRIGHT OFFICE

CASE Act Study	**Docket No. 2025–2**

COMMENTS OF THE COPYRIGHT ALLIANCE

The Copyright Alliance appreciates the opportunity to submit the following comments in response to the notice of inquiry ("NOI") published by the U.S. Copyright Office in the Federal Register on March 10, 2025, regarding the Copyright Office's study of the Copyright Claims Board (CCB).

The Copyright Alliance is a non-profit, non-partisan public interest and educational organization representing the copyright interests of over 2 million individual creators and over 15,000 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 copyrighted works for the public to enjoy.

The Copyright Alliance commends the Copyright Office for creating the CCB from whole cloth in only eighteen months. In the entire history of the U.S. Copyright Office, we do not think that the Office has ever taken on and completed such a massive task in such a limited time. Drafting regulations and getting feedback from interested parties, creating the eCCB, hiring CCB Officers

and Copyright Claims Attorneys (CCAs) to staff the CCB, drafting and publishing CCB educational materials, and everything else the Copyright Office and CCB staff members did to get the CCB successfully and timely up and running was truly an amazing feat—one that the entire copyright community is beholden to the Office for.

We also commend the CCB staff for their hard work implementing the CCB and effectively and efficiently maintaining its operations—including everything from managing the dockets and conducting educational outreach to assisting claimants and respondents in understanding the complexities of copyright law and the CCB processes. These efforts have not gone unnoticed by the copyright community. We truly appreciate all the Office's time and energy to make the CCB the success that it is. These efforts help to ensure that the CCB is meeting the goals set forth in the Copyright Alternative in Small-Claims Enforcement ("CASE") Act: "to be accessible especially for *pro se* parties and those with little prior formal exposure to copyright laws who cannot otherwise afford to have their small copyright claims and defenses heard in federal court."[1] To date, there can be no doubt that the CCB has been an incredible success and a testament to the Office's hard work.

At the outset we would like to offer a few suggestions and general comments related to both the study itself and information about the CCB (rather than actual CCB operations, which we will discuss later in these comments). We hope that the Office will consider implementing the following suggestions as part of the CCB study.

- Since the Copyright Office has the most direct contact with CCB participants (claimants, respondents, and any legal representatives, law school clinics, or pro bono clinics) and has the ability to reach out to them directly, we urge the Office to contact CCB participants to gather information about the questions asked in the NOI. There would be tremendous benefits in directly reaching out to CCB participants to better understand how well the CCB is working and to identify any areas for improvement. In fact, it likely would make

[1] H.R. REP. NO. 116-252, at 17 (2019). *See also* CASE Act Study, 90 Fed. Reg. 11625, 11626-27 (Mar. 10, 2025) ("NOI").

sense for the Office to customarily survey the participants directly following the proceedings in a case, much like restaurant apps do after you have dined at an establishment, or a venue does after you attended an event.

- The CCB's *Key Statistics* report is immensely helpful. We applaud the Copyright Office for taking the initiative to track the numbers in the report and urge the Copyright Office to continue publishing these statistics, perhaps on a quarterly, bi-annual, or annual basis. These numbers help us better understand CCB operations. We hope that the report can be expanded to also track the following:
    - Average damages awarded from CCB final determinations;
    - Average damages awarded on a per work basis; and
    - CCB final determination pendency for both a standard CCB proceeding and a "smaller claims" proceeding.

- While not required, we suggest that the Copyright Office consider conducting another CCB study in three to five years to provide an updated picture of how the CCB is working. An updated study might help to determine whether any changes implemented in CCB operations are having a positive impact.

1. The use and efficacy of the CCB in resolving copyright claims, including the number of proceedings the CCB could reasonably administer.

Out of the 1,222 claims filed with the CCB, there have been almost 50 final determinations issued to date. Given that the CCB is almost three years into operations and a vast majority of proceedings have not reached the final determination, we offer some observations and suggestions on possible ways to improve the initial stages of a CCB proceeding, mainly regarding the compliance review process and service of process.

a. Is the CCB's existence promoting settlements or other private dispute resolutions, either without bringing a claim before the CCB or after filing a claim with the CCB?

Yes, we have strong reason to believe that the existence of the CCB is promoting settlements or other private dispute resolutions, either without bringing a claim before the CCB or after filing a claim with the CCB. According to the CCB's *Key Statistics* report, there were 94 known settlements resulting from CCB proceedings, which is about 7.6% of CCB proceedings.[2] But this is likely only the tip of the iceberg in terms of how many settlements and private dispute resolutions are occurring due to the CCB's existence.

While we do not know the true extent of settlements and private dispute resolutions occurring before and after a CCB claim is filed, we have heard anecdotal evidence from many of our members (typically shared in confidence and with little details) that the mere presence of the CCB and the ability to bring a case before the CCB has led a third-party to respond where in the past they likely would not have, and that such responses have led to conversations that resulted in a settlement.

In addition, we have information about some cases and in others we may make some inferences as to settlement activities after a CCB claim is filed. A filed CCB claim that ends up as an unreported settlement or dispute resolution might conclude in one of three ways in a CCB proceeding: (1) a claimant or both parties voluntarily dismiss the claim without a stated reason (such as when a claimant files a request to withdraw); (2) a claimant doesn't file an amended claim before a deadline during the compliance review process; and (3) a claimant doesn't file proof of service.

We surmise that when a claimant or both parties voluntarily dismiss the claim without a stated reason that is where more settlement activity is likely occurring, particularly when the claimant's request to withdraw claims is made after the claims have been served on a respondent. In some instances, we were able contact the claimant that dismissed the claims or did not file proof of

[2] COPYRIGHT CLAIMS BOARD, KEY STATISTICS, (Mar. 2025), https://ccb.gov/CCB-Statistics-and-FAQs.pdf.

service (which resulted in a dismissal) and were told that the claim was dismissed due to a settlement.[3]

Admittedly, the Copyright Alliance's sample size is a small one. But the Copyright Office has a much better opportunity to follow up with the parties and collect settlement information from the parties. We recognize that in many cases a settlement—including the fact of a settlement itself—may be confidential and thus the parties may still be nonresponsive and thus, the Office may never have conclusive evidence about settlements. Nevertheless, we think it would be beneficial for the Copyright Office to follow up with a survey targeted to the CCB parties to gather information that could yield a better picture as to the extent of settlement activity spurred by the CCB.

Additionally, in searching the CCB docket, we filtered for claimants' requests to withdraw documents and found that nine requests to withdraw were filed after the claimant received a notice to serve; five requests to withdraw were filed after the claimant filed proof of service; and ten requests to withdraw were filed after the claimant was asked to pay the second filing fee. Each of these requests to withdraw were made after the claimant was notified to serve the respondent or the claimant had served the respondent. This could be a strong indicator that after a respondent was notified of the CCB claim, the respondent and claimant were able to resolve the dispute in lieu of proceeding with the CCB case. Thus, this could mean that the existence of a filed CCB claim facilitated a resolution between disputing parties. As we previously mentioned, we believe that this would be a useful segment of CCB participants for the Copyright Office to follow up with to survey them on aspects of the CCB, such as its impact on settlement discussions.

b. Is the CCB's $40 initial filing fee deterring frivolous claims without deterring meritorious claims?

We believe that the CCB's $40 initial filing fee is not deterring frivolous claims or deterring meritorious claims. *But deterrence of frivolous claims is not and should not be the purpose of the*

[3] When the CCB was first launched, we would attempt to contact the parties to determine whether and how their case was resolved. But after several months we had to divert our resources to other issues and were not able to follow up with the CCB participants. As noted earlier in our comments, we think it would be beneficial if the Copyright Office did so.

fee. The Copyright Office set the lower initial filing fee due to stakeholders' concerns about the affordability of a CCB proceeding *in light of respondents potentially opting out*.[4] We do not believe that an increase in the initial filing fee will result in deterring frivolous claims nor should the fee be used for that purpose. Federal court fees are not used to deter frivolous claims. They should not be used for that purpose at the CCB. As is the case with federal court, there are other provisions in the CASE Act and CCB regulations that are intended to deter frivolous claims. Increasing the fee could preclude some copyright owners from filing meritorious claims. Therefore, the $40 initial filing fee should remain unchanged at this time.[5]

c. Is the compliance review process working as intended and, if not, how should it be modified?

The compliance review process is working as intended but, as is the case with any new process, there are aspects of the process that likely could be improved. The compliance review process by far is one of the most challenging aspects of the CCB but we think that some small tweaks to the process could improve the process for both CCB claimants and for the CCAs vetting incoming claims.

The compliance review process serves several purposes, including to educate CCB claimants (especially those who are *pro se*) about the scope and requirements of copyright law (especially copyright infringement) and the operations of the CCB, and to reduce the administrative burden on CCB Officers by ensuring they are only reviewing meritorious and compliant CCB claims. Based on the Copyright Office's CCB statistics,[6] about 38.5% of CCB claims are dismissed during the compliance review stage of a proceeding. While this rate may appear to be high it was also somewhat expected for several reasons:

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[4] *See* Copyright Claims Board: Initiating of Proceedings and Related Procedures, Fed. Reg. 16989, 1690 (Mar. 25, 2022).

[5] There may be other reasons to raise the $40 initial filing fee, but the question only asked about deterrence of frivolous claims.

[6] *See* COPYRIGHT CLAIMS BOARD, *supra* note 2, at 2.

- The CCB process is still in its infancy. One would expect a large learning curve for a new small claims court with its new processes and requirements.

- The learning curve is steeper because claim filers are typically *pro se* CCB claimants who likely have never done anything like drafting and filing a legal claim. Nor are they experts in copyright law.

- There was so much excitement from the creative community about the CCB, especially when it was first launched, that many CCB claimants may have rushed to file their claims as soon as they could and in many cases that resulted in them not taking the necessary time to educate themselves about the CCB beforehand.

While the rate of noncompliant claims was somewhat expected, that does not mean we shouldn't be considering ways to improve upon it and to reduce it. In fact, the CCAs and CCB Officers have already taken some steps to do so, such as making iterative, adaptive changes to improve the process, providing additional information and assistance to claimants who may struggle to make compliant claims, and participating in numerous public education efforts including participating in webinars featuring CCB staff and publishing a CCB Handbook,[7] FAQs, and other materials. The work of the Copyright Office and the CCB is much appreciated and are crucially important. We think more can be done and look forward to working with the CCAs and CCB Officers and others within the Copyright Office and Office of the Chief Information Officer (OCIO) to determine the steps to take to increase the rate of CCB claimants filing compliant claims with the CCB from the start of the CCB process.

In our view, the primary reason why some claimants struggle with filing compliant claims is because they need improved literacy about and more guidance on the specific elements necessary to prove an infringement claim or a misrepresentation claim under the Digital Millenium Copyright Act, and about the CCB generally. One possible step to take would be to require CCB

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[7] *See generally* COPYRIGHT CLAIMS BOARD, COPYRIGHT CLAIMS BOARD HANDBOOK, https://ccb.gov/handbook/.

claimants who have never been in an active CCB proceeding to first participate in and complete a pre-filing information session. To accomplish this, the Copyright Office might be able to offer a monthly webinar or a pre-approved third party could do so. CCB claimants who have previously been in an active proceeding should be exempted from this requirement. The purpose of these sessions would not only be to educate CCB claimants, which in turn increases their chances of filing a compliant claim, but also to reduce the burden of the compliance review process on the CCAs. Additionally, when a CCB claimant files a compliant claim from the outset, it provides them with a more positive experience of the copyright system and increases their confidence in their ability to exercise their rights under the Copyright Act.

Another step to take would be to update the initial CCB claim form and filing process as described further below in our answer to question 3a.

d. Should the CASE Act's service requirements be modified? Are there other ways to increase the ease and efficiency of perfecting service while adequately preserving respondents' due process rights?

Although we have long recognized the concerns associated with the service requirements contained in the CASE Act, we do not believe the requirements should be modified at this time. Before there is any change to this requirement, we think additional steps can be taken to try to improve understanding of and compliance with the service of process requirements. To assist potential *pro se* CCB claimants, this is one topic that may be useful for the Copyright Office to conduct a specific webinar about and to include within the pre-filing information session referenced above. The webinar should be recorded and made publicly available to watch on-demand. Watching this webinar should also be made mandatory for CCB claimants who have never successfully filed proof of service of process for a CCB claim.

We also suggest that the Copyright Office reach out to the National Association of Professional Process Servers to hold informational sessions to educate process servers on the CASE Act's requirements. In addition, the CCB could curate a list of pre-approved process servers (broken down by state) who understand the CASE Act's requirements and to make this list available on the CCB website or provide the list to claimants upon directing the claimant to serve the CCB claim.

Lastly, we believe that the implementation of the pre-filing information program as described earlier in these comments would help claimants better navigate this stage of the proceeding.

e. Is the opt-out system working as intended and, if not, how should it be modified?

The opt-out system is working as intended and does not need to be modified. By our calculations, the opt-out rate is almost 43%,[8] which has been more or less the steady rate since the launch of the CCB.

f. Are there ways to further streamline and reduce the complexity of CCB proceedings while preserving parties' rights? For example, should any statutory or regulatory time periods be adjusted to allow for faster resolutions of claims?

By our estimates, the average time it takes for the CCB to issue a final determination in a standard CCB proceeding is about 1 year and 4 months. When the CASE Act was drafted and the CCB was first launched it was well understood that because of the newness of the CCB, during the first few years the proceedings would likely move more slowly. It is our hope that CCB final determination pendency will decrease over time. We think there may be steps that can be taken to decrease the timeline, including implementing the pre-filing information session requirement, hosting additional educational webinars, and implementing other technical solutions that we suggest elsewhere in these comments.

One other step that could be taken is to change the number of CCB Officers presiding over a standard CCB proceeding. At present, three CCB Officers preside over a standard CCB proceeding. We suggest that this be changed to only one CCB Officer, unless a request is made by one of the parties for all three CCB Officers. This approach should expedite final determination pendency while preserving flexibility for CCB parties who may want all three CCB Officers to participate. Having only one CCB Officer preside over an entire proceeding as the status quo would likely increase the efficiency of a CCB standard proceeding by helping claims move more quickly through the process as only one CCB Officer is reviewing the claims and making

[8] Opt-out rate was calculated based on number of opt-outs timely filed by respondents divided by total sum of the number of timely opt outs and CCB orders to the claimant to pay a second filing fee.

determinations and frees up the other CCB Officers to handle other claims in the docket. Only one judge presides over a case in federal district court, which would make having only one CCB Officer not an unusual feature.

i. Are the processes and procedures for smaller claims proceedings appropriately tailored to parties' needs and expectations, compared to the processes and procedures that apply in standard proceedings?

Yes, we believe that the processes and procedures for smaller claims proceedings are appropriately tailored to parties' needs and expectations compared to the processes and procedures that apply in a standard proceeding. However, as the smaller claims proceeding still incorporates the compliance review process, the issues and solutions we mention in our answers to question 1c and 3a regarding suggested updates for the compliance review process also apply to claims filed through the smaller claims process.

3. Are there ways that the CCB can be made more accessible and user-friendly, including for self-represented parties? For instance, please consider:

a. Whether the CCB's forms, processes, or procedures should be adjusted;

As previously noted, the CCB and the Copyright Office have done a tremendous job in implementing and launching the CCB under a tight timeline with user-friendly forms and portals to access and respond to claims. However, it would be beneficial to update the claim form to address some of the issues that typically arise during the compliance review process. We recommend similar updates be applied to a CCB counterclaim form, to the extent there is overlap between the CCB claim form and the counterclaim form.

One change that we strongly recommend is that OCIO modify the questions to illicit better responses from claimants. For example, the current form asks a claimant to "Describe the infringement." That question should be further broken down into specifically asking the claimant to describe facts needed for crucial elements of the claim like asking specifically how the respondent accessed the work in dispute and to describe the similarities between the infringing work and the claimant's work. Doing so should illicit the requisite information on the form instead

of the CCAs having to conduct additional follow up with claimants during the compliance review process.

Other suggestions include:

- Certain features of the claims form should prohibit the claimant from moving forward in the application process. For example, in the infringement claim form, the claimant is asked several additional questions when they indicate that the respondent is an online service provider. Rather than allowing the claimant to move forward in the process by giving a simple warning against a possible finding of a non-compliant claim, the form should prohibit claimants from moving forward in the filing process if they are, for example, bringing a claim against an online service provider and have never sent a takedown notice.

- Along the same lines, certain information already held by the Copyright Office should be linked to the CCB form to streamline the process. For example, the form asks about registration of the copyrighted work in the proceeding. This information should be linked in the backend to the Copyright Office's system so that a claimant cannot move forward in the application process without entering a valid registration or service number that would be automatically verified across the Copyright Office's records.

- The Copyright Office and OCIO should consider incorporating auto-complete features into the form to expedite the process of filling out information such as claimant information previously entered in prior CCB claims by the account user.

- Inline help incorporated throughout the form should explain certain copyright or CCB terms in one or two lines instead of wholly referring and linking to the CCB Handbook.

We realize this may mean that the Copyright Office will need necessary appropriations and funding so that the OCIO can effectuate these changes in the form, and we will continue to support the Office's efforts through the Library of Congress to prioritize and implement those technical changes to make the CCB more efficient and streamlined.

b. Whether the CCB should supplement its educational resources (e.g., its handbook, video tutorials, handouts, and website), either by revising existing resources or adding additional resources.

The CCB should supplement its existing educational resources to cover more topics about the CCB, especially as CCB parties familiarize themselves with the new tribunal. The CCB Handbook is a comprehensive guide for CCB parties. It is a fantastic tool, but we think it may not be used as often as it should. We suggest that the Office further publicize the Handbook. Truncated one-pagers of certain CCB processes and topics covered in the Handbook would also be useful for CCB parties so they can digest the information better. This approach would be similar to how the Copyright Office maintains its informational Circulars while also separately maintaining its Compendium.

Additionally, the Copyright Office should host more public webinars to cover specific aspects or topics regarding the CCB process. The Office can gauge which topics to prioritize coverage based on the needs and the interests of current and potential CCB participants. The need is most apparent by looking at which stage CCB claims are dismissed most often (e.g., right now at the compliance review process and the service of process stages). This is another area that the Copyright Office can conduct a survey about to better understand where the knowledge gap from CCB claimants can be filled. Similar to the suggestion made earlier about creating a webinar on CCB service requirements, recording it, and making that available for on-demand viewing, these webinars should also be made publicly accessible. This would also give the CCB an opportunity to simply direct certain CCB parties to watch certain webinar recordings when such parties may need more information and education on certain aspects of a CCB proceeding.

We also recommend that the Resources navigation tab on the CCB website prioritize listing the CCB Handbook, webinars, and other educational materials instead of providing the statutory text of the CCB regulations, Final Determinations, the statutory text of the CASE Act, and other more legal materials which are not as useful for *pro se* claimants who may find these documents unhelpful, overwhelming, and confusing.

4. Are there any changes that could be made to improve the default process or reduce the incidence of defaults while adequately preserving respondents' rights and ensuring the timely processing of claims?

No changes need to be made to the default process at this time. There are plenty of opportunities for respondents to participate in a CCB proceeding or not before the CCB issues a final determination adopting a proposed default determination. Particularly given the infancy of the CCB, we appreciate the CCB's careful application of the CASE Act, which has provided more than enough opportunities for respondents to participate in a CCB proceeding, even allowing motions to vacate a final determination.[9]

The CCB itself has also made tremendous efforts to educate and inform respondents about the CCB. In *Oakes v. Heart of Gold Pageant System Inc.*, the procedural history reveals that the CCB repeatedly engaged with the respondent to inform her about the CCB and about her rights as a respondent.[10] If anything, the CCB has been more lenient to respondents as CCB parties continue to familiarize themselves with the CCB's existence and scope of review of small copyright claims.

5. Are the statutory and regulatory rules for addressing bad-faith actors working as intended? In particular, is the one-year ban for bad-faith actors sufficient in length and should there be different sanctions for repeat offenders?

The rules set in place to address bad-faith actors seem to be working at this time, especially given the scarcity of evidence of repeated, rampant abuse of the CCB. The CCB has done a good job in detecting, analyzing, and handling the few bad-faith behaviors it has encountered. Through the proceedings in the CCB's docket, we have seen that, despite CASE Act critics stating that the small claims court would unleash massive numbers of frivolous claims and misuse of the system

[9] For example, in the proceeding *Corjulo v. Mandrell,* the respondent finally participated in proceedings after two default notices—a whole month after the deadline to respond or register for the eCCB and during the claimants' period to submit written direct testimony. Corjulo v. Mandrell, 22-CCB-0008 (Copyright Claims Board 2023), https://dockets.ccb.gov/document/download/6285.

[10] *See* Oakes v. Heart of Gold Pageant System Inc., 22-CCB-0046 (Copyright Claims Board 2024), https://dockets.ccb.gov/document/download/6771.

by bad-faith actors, there is no doubt that their dire predictions have failed to come to fruition.[11] The statutory and regulatory rules to address bad-faith actors have been working and no changes are needed at this time.

To ease the administrative burden on CCB Officers, we again recommend the changes to the CCB claims form that we suggested above (i.e., to prevent claims that do not meet certain requirements from being filed at all). A vast majority of the findings of bad-faith conduct relate to situations where a claimant provides false information of domestic addresses in the claims form to bring claims against foreign-based respondents. The CCB's time and resources in issuing an order and setting up a conference for these no-show claimants to explain their conduct is better spent on evaluating other CCB proceedings. Technical solutions to prohibit this sort of behavior would be far more efficient.

7. Whether adjustments to the CCB's authority are necessary or advisable, including with respect to: (A) eligible claims, such as claims under section 1202 of title 17, United States Code (which addresses the integrity of copyright management information); (B) eligible types of works; and (C) applicable damages limitations.

a. Are there additional claims that arise under title 17 that would be appropriate for the CCB to resolve?

Adjustments to the CCB's authority are not necessary or advisable.

b. Currently the CASE Act's damages limitations are $30,000 per proceeding and, for statutory damages, $15,000 per work infringed. Would raising or lowering these caps improve the operations of the CCB?

The damages limitations do not need to be adjusted at this time. However, we do think this point should be revisited at a later time and limits should be adjusted in the future, especially to account for and keep up with rising costs and inflation.

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[11] *See* Katie Fortney & David Hansen, *Assessing the Copyright Claims Board After Two Years*, 70 J. OF THE COPYRIGHT SOC'Y, 452, 465 (2023); *see also* Melissa Eckhause, *Closed Doors to Justice: How the Copyright Claims Board Is Shutting Out Pro Se Litigants*, 43 CARDOZO ARTS & ENT. L.J., 1, 60-62 (2025).

c. Whether greater allowance should be made to permit or limit awards of attorneys' fees and costs to prevailing parties. Currently the cap for attorneys' fees and costs for bad-faith conduct under the CASE Act is $5,000; however, in extraordinary circumstances, the CCB can exceed that cap. Should this cap be increased or decreased?

The current cap for attorneys' fees and costs for bad-faith conduct does not need to be adjusted at this time. Mechanisms within the CASE Act and CCB regulations provide sufficient ways to address bad-faith conduct. We have not seen evidence of rampant misuse of the CCB which would warrant changes to the law.

9. Whether the CCB should be expanded to offer mediation or other nonbinding alternative dispute resolution services to interested parties.

The CCB itself is already categorized as an alternative form of dispute resolution, as noted in the CASE Act.[12] In addition, CCB Officers already have the authority to bring the parties together to encourage settlements and have the authority to incorporate elements of an agreement between the parties (for example to cease the infringing activity) into the final determination.[13] It would be better to first optimize the CCB under its current capabilities and dedicate resources to ensure those operations are running smoothly before examining whether to expand the CCB's offerings. Therefore, we do not think the CCB needs to be expanded to offer additional mediation or nonbinding alternative dispute resolution services.

10. Other topics of interest to the Register:

c. Are there any other issues relevant to the CCB or the CASE Act that commenters wish to address, including any proposed statutory or regulatory changes?

We urge the Copyright Office to reach out to the federal court system to conduct educational outreach for federal judges (perhaps through the Administrative Office of the U.S. Courts), so that federal district court judges are aware of the CCB and understand that they may be able to clear some of their dockets of less complicated copyright cases by sending them to the CCB if the parties consent. Anecdotally, the Copyright Alliance once informed a district level federal judge

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[12] *See* 17 U.S.C. §§ 1502(a) & 1509(b).

[13] *See* 17 U.S.C. § 1506(r).

about the existence of the CCB, to which the judge expressed a great surprise and interest in learning more about. The judge mused whether she could have recommended some of the cases from her docket to be transferred to the CCB instead. We believe more judges may be similarly interested, and that a referral of more cases from the federal court system to the CCB would be beneficial to: (1) the federal courts, which can clear some of its docket of copyright cases; (2) the CCB Officers and CCAs, who may receive more meritorious and stronger CCB claims and counterclaims; and (3) parties in a dispute, who would benefit greatly from a less expensive and less time consuming process for the same or similar claims. We recommend the Copyright Office reach out to the Administrative Office of the U.S. Courts and also reach out to the Federal Judges Association about presenting on the CCB to federal court judges and clerks in order to increase the federal court system's awareness of the benefits of the CCB.

Conclusion

We once again thank the Copyright Office for its tremendous work and efforts in launching and running the CCB to ensure its success. We will continue to support the Copyright Office in its efforts to improve the CCB and are happy to discuss anything raised in these comments in further detail.

Respectfully Submitted,

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