

# Rights, Registries, and Remedies: An Analysis of Responses to the Copyright Office Notice of Inquiry Regarding *Orphan Works*

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## Abstract

The U.S. Copyright Office received hundreds of responses to the Notice of Inquiry regarding orphan works. The responses report encounters with orphan works in all types of media, and many propose solutions to the problem, ranging from the creation of support services to eliminate or alleviate the problem to new legislation that would provide exemptions or accommodations that allow unauthorized use of copyrighted works under certain conditions. A quantitative look at the responses shows their general contours. A qualitative examination of the pros and cons of different positions taken on the many issues that must be addressed to solve the problem of orphan works reveals the trade-offs and implications of different actions to address the problem and the different perspectives and agendas of the respondents. Following these objective analyses of the responses, the paper argues for multiple approaches to solving the problem aimed at balance, certainty, practicality and progress.

## Framing the Problem

A free culture supports and protects creators and innovators. It does this directly by granting intellectual property rights. But it does so indirectly by limiting the reach of those rights, to guarantee that follow-on creators and innovators remain *as free as possible* from the control of the past. A free culture is not a culture without property, just as a free market is not a market in which everything is free. The opposite of a free culture is a 'permission culture' – a culture in which creators get to create only with the permission of the powerful, or of creators from the past. – Lawrence Lessig, *Free Culture*, p.xiv

The opportunity to create and transform becomes weakened in a world in which creation requires permission and creativity must check with a lawyer. – Lawrence Lessig, *Free Culture*, 173

In the analog world, roles in the supply chain of information – from creation through consumption – were more clearly delineated and rights more clearly constrained than they are in the digital world. The capabilities of digital technology challenge the practices and very definitions operative in the analog world. For example, "publication" in the analog world was more likely the result of a peer-review process that added value and assured the quality or authoritativeness of a work than currently occurs with many Web pages. Photocopying an entire book was not only illegal, but discouraged by the tedium, cost, and resulting hundreds of lower quality, loose-leaf pages. In the analog world, exercising the right of first sale was constrained by the physicality of the work, which also constrained the

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number of simultaneous users of the work. In contrast, copying a digital book occurs automatically upon viewing, and (unless constrained by technology) multiple identical, high quality copies can be created and distributed at the click of a button. Digital technology has changed or challenged the cultural practices of centuries, practices that turned on the physical rendering of intellectual property. It has yielded a paradigm shift in consumption, from purchased ownership to licensed access, and enabled a veritably unlimited number of simultaneous users of the same work at the same time. Digital technology has simplified and reduced the cost of all of the copyrights: reproduction, distribution, public display and performance, and the creation of derivative works. The ease with which these things can be done now has dramatically changed behavior and expectation. To paraphrase Lawrence Lessig, digital technology enables anyone with a computer to participate in building and cultivating culture. People using this power are changing the marketplace and these changes threaten content industries (Lessig 2004, 9). The upshot is vociferous debate among those who prefer to cling to the traditions of the analog world, to replicate and lock them down in the digital world at great expense, and those who prefer to adopt new policies and practices aligned with the capabilities and economics of the new technology.

The debate over the definition and scope of what should constitute an orphan work is discussed in this paper, but for the purpose of these introductory remarks please allow the general understanding to be a work for which the copyright owner cannot be found – a diabolical problem in a permission culture. Orphan works no doubt existed before computers became popular consumer goods and before the invention of the Web. These technologies, however, have exacerbated the problem by increasing the demand for preservation and access to these works, especially as they are likely to be works of little commercial value but of great historical value, i.e., a treasure trove of knowledge about who we are, where we came from, and what we've done.

The issues surrounding orphan works are complex. The very topic puts a spotlight on the problems inherent in a permission culture, a culture created and sustained by a labyrinth of laws driven in large part by content industries that have “queered” (to use Lessig’s word) the marketplace and fundamental cultural values. The orphan works problem highlights just how far we have wandered from the free culture of our roots. We live in a world where the two legal options that enable innovations built on the past – permission and fair use – are so fraught with problems, risks, and costs that they discourage rather than encourage preserving and cultivating culture. Acquiring permission is difficult if not impossible and prohibitively expensive in many instances. Relying on fair use is too risky, even for wealthy content industries. “Just at the time digital technology could unleash an extraordinary range of commercial and noncommercial creativity, the law burdens this creativity with insanely complex and vague rules and with the threat of obscenely severe penalties” (Lessig 2004, 19). The opportunities digital technology provides to stir democracy and creativity are obstructed “in a world in which creation requires permission and creativity must check with a lawyer” (Lessig 2004, 173).

The age, physical format, and ephemeral nature of many orphan works threaten their very existence. Our cultural and intellectual heritage in film, music, photographs, art, books, archival documents, etc. can be preserved by converting these works to digital format or at least replicating them in print. The law allows, under certain conditions, the preservation of copyrighted works, but a *preservation* copy is not a *use* copy. It is a locked-up copy, at least for the copyright term of the work. Preservation is not enough if the goals are marketing and cultivating culture. Broad access and use are essential to achieve these ends. Providing online access to orphan works would be a first step, a significant step, but access without a right to use would create a “read only” culture. To truly encourage the

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

creation of new works and enhance or advance scholarship, research, education, and lifelong learning, people must be able to use and “tinker” with these works. The Internet, more specifically the Web, enables for the first time in history a new kind of teaching and learning that respects different styles. Digital technology provides an opportunity for us to overcome limitations inherent in our linear, left-brain, analog world, and to encourage curiosity and creativity. Requiring permission from copyright owners who cannot be found threatens loss of our heritage and harms our ability to teach, learn, create, and compete in a global marketplace. Those who share this view believe the government should do something to address the problem of orphan works. The opposing camp argues that allowing unauthorized use of copyrighted work would encourage copyright infringement and destroy our economy by eliminating the incentive to create. The government should strengthen protections, punish pirates and other infringers, and ensure that copyright owners are appropriately compensated. Granted, this is a simplistic view of the terrain. As will be seen in this paper, there are positions in between these polar opposites. But let this suffice for an introduction to the problem space.

Concerns about whether current copyright law “imposes inappropriate burdens on users, including subsequent creators,” of orphan works and whether these works “are being needlessly removed from public access and their dissemination inhibited” prompted Senators Orrin Hatch and Patrick Leahy to ask the Register of Copyrights to study the problem and report to the Senate Judiciary Committee by the end of the year (Notice of Inquiry 2005, 3). The result was the U.S. Copyright Office’s Notice of Inquiry regarding orphan works, posted to the Federal Register January 26, 2005. The Notice requested initial comments from interested parties by March 25, and reply comments by May 9, 2005.

The Copyright Office received hundreds of responses to their Notice of Inquiry, each of which shared some experience or expressed some concern about the problem of orphan works or its solution. The responses run the gamut from uninformed (or misinformed) to well informed, from unintelligible rants to thoughtful analyses. They report painful experiences and heartfelt concerns from positions both for and against any action to address the orphan works problem. They reflect naiveté, arrogance, ignorance, ingenuity, acuity, altruism, and self-interest. Taken as a whole, the responses provide a diversity of perspectives on U.S. copyright law from a self-selected cross section of citizens and for-profit and non-profit organizations. Indeed they are a rich read.

The problem of orphan works raises serious questions about the proper balance of private interest and public good inherent in copyright law. The burning questions are whether unauthorized use of copyrighted works, i.e., use without the copyright owner’s permission, should be allowed in certain circumstances and if so, what those circumstances might be. Should we and can we devise a designation of “orphan” works that both protects the rights of copyright owners and enables preservation, access, and use of orphaned cultural artifacts? Understanding the scope of the problem and the harm it causes is critical to finding an appropriate solution.

### The Agenda and Approach of this Paper

This paper provides a preliminary analysis and critique of the responses to the Copyright Office Notice of Inquiry, both the initial comments and the reply comments. The analysis includes a high level, quantitative look at all of the comments, and a qualitative, closer look at the objections to allowing unauthorized use of copyrighted works under any circumstances and the proposed solutions that would allow unauthorized use under

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

certain circumstances. To the best of my ability, the analysis conveys an objective look at the responses, providing the pros and cons brought forth by the various respondents for each significant point under debate. Then taking a step back and looking at the debate through my personal lens as a professional librarian, as leader of the National Information Standards Organization (NISO) initiative on rights expression and management in the digital environment, and as a student of technologically driven cultural change, the paper provides my subjective, albeit preliminary, observations and recommendations for cutting a viable path through the maze. The work in this paper is preliminary in the sense that it has been constrained by the time available from the posting of the comments to the due date of this paper.

Unlike many of the reply comments to the Notice of Inquiry that dispensed with “outliers” and addressed what they claimed to be consensus in the initial comments, this paper acknowledges the outliers in the belief that the voices and opinions of a diverse citizenry should be heard in a deliberative democracy. Furthermore, absent a rigorous empirical study, there is no way to know if the outliers in these ad hoc comments represent the views of a significant segment of the population. Those who responded were self-selected, and it would be all too easy to dismiss as an outlier a view that was counter to our own or simply the view of a group less likely to self-select.

### Initial Observations

To get a handle on the general contours of the comments, I devised a simple coding scheme. The results of this scheme do *not* accurately indicate the popularity or weight of positions for or against action to address the orphan works problem. Some comments were submitted by single individuals. Others were submitted by one or more organizations with thousands of members. Furthermore, all comments were not created equal, so to speak. Some are very well informed, others are not. Nevertheless, some way to grapple with the volume of responses was necessary as a starting point. To begin my task of trying to understand how the populace responded to the Notice of Inquiry, I analyzed both the initial comments and the reply comments using the following categories and definitions:

- Experience – The comment reported first- or second-hand encounters with problems related to orphan works.
- No – The comment explicitly stated an objection to any action that would allow use of copyrighted works without the copyright owner’s permission.
- Yes – The comment explicitly or implicitly stated approval of or requested action to address the problem of orphan works. Comments that described experience as a matter of fact, without requesting help or indicating harm caused by orphan work, were *not* coded as “Yes.” I took this conservative approach as a precautionary measure to prevent my personal position from coloring my coding.
- NIMBY (“Not In My Back Yard”) – The comment explicitly stated approval of or requested action to address the problem of orphan works, but requested that *their* content be exempt from any orphan works designation because there is no or only a minor problem in their domain or because there are other compelling reasons that warrant their exemption.
- Solution – The comment proposed some action that could help to alleviate the problem of orphan works.

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

A rare few comments received neither a “Yes” nor a “No” code, for example, the comment that simply asked who owned the copyright on a vacation photograph taken by a random passerby. A few comments were coded “No” and “Solution” because they objected to allowing use of orphan works without permission, but proposed some action to eliminate or alleviate the problem.

Table 1 shows the results of this analysis. Few respondents submitted both an initial and a reply comment, and few objected to action that would allow unauthorized use of copyrighted work under any conditions. Very few approved action to address the problem everywhere but in their domain. The overwhelming majority approve allowing unauthorized use in some circumstances. Many respondents shared personal experience with orphan works and proposed something about the solution to the problem. Not surprisingly, the reply comments focused more on the solution to the problem than the experience of the problem.

	No	Yes	NIMBY	Experience	Solution
Initial comments	8%	79%	1%	52%	54%
Reply comments	5%	86%	3%	33%	62%

Table 1. Rudimentary content analysis of initial comments and reply comments.

The many comments that reported experience with orphan works reveal the broad scope of the problem in terms of users, uses, and media. From personal to professional use of photographs, graphic art, software, film, books, radio and television broadcasts, any media you can think of, works for which the copyright owner cannot be found have created problems for academic researchers, teachers, students, journalists, documentary filmmakers, radio producers, photo shops, authors, publishers, record producers, hobbyists, scientists, engineers, libraries, archives, and museums. Though a few respondents claimed that there is no problem or only a minimal problem in their area and therefore their domain should be exempt from any legislation that would allow unauthorized use, experiences reported and in some cases data provided by other respondents belie these claims. All of the “NIMBY” respondents, though seeking exemption from an orphan works solution for their content, proposed solutions for the orphan works problem in other domains.

To enable me to target “Solution” responses that warranted focused study, I also analyzed the initial and reply comments using the following categories and definitions:

- Simple solution – The comment proposed one to three actions that could help to alleviate the problem of orphan works. I also noted whether the recommended action was to remove copyright protection from orphan works (make them public domain) immediately or upon meeting certain conditions.
- Detailed solution – The comment proposed more than three actions or solution criteria that could help to alleviate the problem of orphan works.
- Solution analysis – The comment articulated advantages or disadvantages of different definitions of orphan works or approaches to the problem.

My operating assumption was that comments containing “Detailed solutions” and “Solution analysis” were likely to contain the points of merit in “Simple solutions.” Note that these codes, like the previous ones, do not accurately indicate the popularity or weight of

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

positions for or against action to address the orphan works problem. They simply provide a slightly more detailed view of the general contours of the comments.

The results of this analysis are shown in Table 2. Overall, most of the solution proposals were “Simple,” though the percentage of “Detailed solutions” and comments containing “Solution analysis” increased in the reply comments. Among the initial comments, over a third recommended that orphan works become public domain immediately or conditionally; significantly fewer reply comments proposed the public domain as the solution. In conducting this analysis, I observed that proposals for the public domain came from individuals, not organizations, and were typically quite brief. Responses from organizations were longer, more detailed, and more analytic, which is not to say that no individuals proposed detailed solutions or provided analyses. More importantly, I observed that reply comments that made claims about consensus in the initial comments simply ignored all the proposals that orphan works become public domain. Granted, the solution adopted for the problem of orphan works is not likely to be the public domain, but it is misleading at best and at worst irresponsible to not even acknowledge that more comments proposed the public domain solution than any other solution. The many public domain proposals reveal something of interest if not significance about our citizenry, and overlooking or dismissing their comments entirely reveals something important about those who claim to build on consensus.

	Simple solutions			Detailed solutions	Solution analysis
	Public domain	Conditional public domain	Other		
Initial comments	26%	10%	42%	22%	19%
Reply comments	4.5%	4.5%	54%	37%	38%

Table 2. Analysis of solution proposals.

The remainder of this paper explores the responses to the Notice of Inquiry in detail, beginning with respondents’ answers to the Copyright Office’s questions about the definition of an orphan work and the scope of the designation as these frame the objections and approaches to allowing unauthorized use of copyrighted works. The analysis focuses on the initial and reply comments coded as “No” and those coded as “Detailed solution” with “Solution analysis.” The interaction of perceptions, priorities, assessments of value, awareness of relevant international treaties, and concerns about abuse, bureaucracy, control, risk, and cost, along with the respondent’s presumptions about the purpose of copyright protection and allowable unauthorized use color the responses and make it difficult to present the debate in a linear fashion. The same arguments are brought forth again and again to address different issues and are sometimes used to make different points. In some cases, the definition of an orphan work shapes the proposed solution. In other cases, criteria for an acceptable solution shape the definition of an orphan work. For example, those primarily concerned about a solution that will scale to meet the needs of libraries, archives, and other cultural heritage institutions take a significantly different approach to defining an orphan work from those focused on individual use. I will do my best to walk you through the quagmire.

Though the comments are posted on the Copyright Office Web site for public review, in the interest of objectivity and not biasing or influencing the reader’s response, throughout this paper the person or organization that submitted the comment is not named and – with rare exception – the frequency or popularity of the points made is not indicated. Instead, significant issues raised in the comments are briefly articulated and the pros and cons

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

presented. Because the pros and cons often come from respondents with different priorities and perspectives, they do not always present a coherent whole.

### **The following headings outline the content of pages 7-21:**

#### **Defining Orphan Works**

**Copyright Owner Cannot Be Found**

**Copyright Owner Cannot Be Identified**

**Copyright Owner Does Not Respond**

**Age**

**Publication Status**

**Print Status**

**Type of Work**

**Application and Duration**

#### **Scope of Users and Uses of Orphan Works**

**Objections to Allowing Unauthorized Use**

**Copyright Registries to Avoid or Alleviate the Problem**

#### **Categorical Approaches**

**Default Licenses**

**Safe Harbor Exemptions**

**Registry of Orphan Works**

#### **Case-By-Case Approaches**

**Public Domain**

**Compulsory Licensing**

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

### Reasonable Effort Accommodation

*Specificity and Flexibility*

*Documentation*

*Notice of Intent*

*Registries of Users and Uses of Orphan Works*

*Piggybacking on Prior User Efforts*

*Liability of the User of an Orphan Work*

*Ongoing and New Uses of Mistakenly Designated Orphan Works*

### Recommendations and Observations

Needless to say, the orphan works problem is profoundly complex. Clearly much is at stake and there are many stakeholders. Just as clearly, digital technology is implicated in the problem and its solution. Table 3 is an attempt to apply criteria for an acceptable solution articulated in the responses to the Notice of Inquiry to the proposed solutions. No proposal strikes me as a perfect match or conspicuous winner. Ideally, all of the cells in the Table for a given solution would be “Yes.” Part of the problem in applying the criteria is that many of the proposed solutions have more questions asked than answered. The Table also masks significant differences in the scope of application of the proposals.

Solution criteria	Public domain	Compulsory license	Default license	Safe harbor exemption	Reasonable effort accommodation
Does it avoid harming copyright owners?	NO	NO	MAYBE	MAYBE	MAYBE
Does it lower risk to users?	YES	YES	YES	YES	MAYBE
Does it avoid unnecessary costs?	MAYBE	NO	YES	YES	MAYBE
Does it avoid unnecessary bureaucracy?	MAYBE	NO	YES	YES	MAYBE
Does it comply with international treaties?	NO	MAYBE	YES	YES	MAYBE

Table 3. Analysis of solution criteria and proposals.

The criteria reveal significant concerns about balance, certainty, and containing costs. The solution will require compromise and burden, the question is who gives and who endures. Under the current copyright regime, the balance is clearly tipped in favor of copyright owners, users are bewildered and threatened, and millions of valuable works apparently orphaned are not used. We need a practical solution and we need it now, a solution that is reasonable for creators, gatekeepers, and users of all stripes. Copyright owners are concerned primarily about compensation and loss of control. Users are concerned about costs, risks, preservation, access, and the right to use. Disenfranchised creators, forced to transfer exclusive rights to publishers that no longer see a viable market for their work, are concerned about dissemination of their work. What can we make of this soup of concerns?

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

I believe solving the problem requires multiple solutions. We already have a copyright regime wherein one size does not fit all. There is no good reason to make that a requirement now.

I support the expanded exemption of U.S. Title 17 §108. This exemption, as proposed, is workable now with minimal effort. Current copyright law already grants exemptions and safe harbors for certain communities of interest and classes of works. It is not uniform and equitable now and those arguing for uniformity and equity in addressing orphan works do not make a case for reviewing and revising the entire multitude of copyright laws to make them uniform and equitable across the board. Their argument is disingenuous and defensive, prompted by fear of the capabilities of digital technology. An operational definition that can scale to identify large numbers of published written works at low cost is required to meet the urgent needs of libraries, archives, and educational institutions. In conjunction with a take-down option for copyright owners who fail to register their intent to exercise the full scope of copyright protection, expanding this exemption will encourage preservation and use of materials of little commercial but great historical value. Allowing non-profit use of these works for scholarly and educational purposes is in the public interest. Those who argue against this exemption are likely those who would have outlawed the photocopier and used book stores. When a book goes out of print “it can be sold in used books stores without the copyright owner getting anything and stored in libraries, where many get to read the book, also for free. Used book stores and libraries are thus the second life of a book. That second life is extremely important to the spread and stability of culture” (Lessig 2004, 113). For the net generation, a work does not exist if it can't be found online. Even those who prefer to use materials in print prefer to find them online. Digital libraries are essential to meet these needs, essential to democracy and the cultivation of culture in today's world. Libraries are prepared to fund the digitization of these materials and provide equitable access to them. Their copyright owners, who see no market for these works, are not. They should not be allowed to deny access to them.

I acknowledge that expanding Title 17 §108 does not address the full scope of the orphan works problem. It's a first step and a small step at that, but it would have a powerful impact on researching, teaching, and lifelong learning. Nevertheless, further steps are urgently required to address all users, all uses, and all orphan works. For the reasons noted in the respective sections of this paper, I strongly disapprove of making orphan works public domain and I disapprove of compulsory licensing schemes. I am not optimistic that the many issues swarming around the “reasonable effort” accommodation can be settled to the satisfaction of all interested parties or settled in a timeframe likely to enable salvaging valuable endangered works or to facilitate access and use in my lifetime. If working through the myriad issues inherent in a reasonable effort accommodation does not prove too expensive, unwieldy, or controversial to manage, such that the whole effort fizzles out like the attempt in 1994 to establish fair use guidelines for digital works, I predict that the power and self-interest of big media lobbies will push through the reasonable effort accommodation with the remedy of reasonable royalties, the uncertainty of which could yield the same results as the “fair use” defense, i.e., self-censorship and gatekeeping. Frankly, the whole notion of granting a legal right that is nothing more than a defense in litigation strikes me as nothing more than a taunt of the citizenry and a trap for the unwary. The reasonable effort accommodation is so fraught with problems that I hope it collapses under its own weight. The burden it would place on users will do nothing to restore balance in our copyright system. The reasonable effort accommodation will likely do nothing of real value for copyright owners. It will not end or address the issue of piracy of commercially viable works. What it might do is make content industries reassess the value of a work on the spur of the moment and invent a “reasonable royalty” presumably

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

designed to resemble actual market practice – but no actual market practice existed for this work prior to its use under the reasonable effort accommodation. The situation is analogous to the child who shows no interest in his toys until the neighbor kid starts playing with them, the difference being that the reasonable effort accommodation would make the neighbor kid guilty under the law. The group likely to benefit most from a reasonable effort accommodation is lawyers. Such a solution is not practical, preferable, or affordable.

I am most intrigued by the default licensing approach to solving the problem of orphan works. It is elegant in its simplicity, outward and forward looking in its thrust, commendable in reducing harm, burdens, and costs. I fully support but am not optimistic that default licensing will be adopted. I do believe that the time has come for radical change if we want to continue to have a free culture – not free as in free beer, but free as in not unnecessarily fettered by the past. But I sadly suspect that the default licensing proposal is ahead of its time. Significantly more grass roots work needs to be done. No comments with “Solution analysis” seriously considered the default licensing proposal, just as they dismissed the public domain as the solution to the orphan works problem. Those who objected to any action that would allow unauthorized use of copyrighted works attacked the free culture movement, though their comments reveal that they do not understand it.<sup>1</sup>

In my opinion, the ideal solution will not be framed to address the fears or protect the self-interests of content industries. Such a frame would only further burden users and cripple technological innovation. Instead the frame should harness the potential of the technology to create a future aligned with, but not controlled by, our past. Medieval monks controlled manuscript technology, censored what was copied, and were put out of business by print technology, which re-defined and democratized literacy itself. No one argues that this was a bad thing. Imagine our world today if the medieval Church had managed to lock-down or control the printing press. Likely there would be many fewer readers and books, and Latin would probably have been the language of scholarship until Vatican II. Today those who rule in the analog world of print are at risk of losing their control in the digital realm. So be it. What we gain will far exceed what we lose. The default licensing proposal illumines and models a path that would both compensate copyright owners *and* encourage tinkering, creativity, and progress by embracing technology. What is needed is an easy, affordable process for registering all types of works. Granted, this will be a significant challenge with some media, but it is not an impossible task. Representative creators and professional associations could collaborate to prepare requirement specifications designed to meet the needs of each community of interest.

What’s at stake is “Not *whether* creative property should be protected, but how. Not *whether* we will enforce the rights the law gives to creative-property owners, but what the particular mix of rights ought to be. Not *whether* artists should be paid, but whether institutions designed to assure that artists get paid need also control how culture develops” (Lessig 2004, 120). Once understood, what is there to legitimately resist in the default

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<sup>1</sup> Those who objected to any action to address the orphan works problem appear to be disenfranchised by the current copyright system. They are understandably frightened and angry. These communities, photographers and graphic illustrators, deserve special attention in the inquiry into orphan works. The sheer number of photographs taken by a professional photographer and understandable practice of putting attribution information on the back of the work, where it is inconspicuous if not inaccessible, seems to me to warrant special handling in copyright law. The Copyright Clearance Office’s payment of copyright royalties to primary copyright holders at the expense of third-party interests warrants investigation and redress.

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Symposium on Free Culture and the Digital Library – Emory University – Atlanta, GA – October 2005

license proposal? It requires no unwieldy bureaucracy or exorbitant costs, entails no significant risks or sacrifices, and avoids creating jobs for lawyers. Furthermore, it exposes and leverages the mistaken assumption that the current copyright regime is in the best interest of all copyright owners and all copyrighted works throughout their copyright term. If all copyright owners approved of the current regime there would be no open source software, no open access movement, and no Yahoo! service to search only materials with Creative Commons licenses. There is a ground swell afoot that demonstrates strong dissatisfaction with current copyright law and practice. The problem is clearly bigger than orphan works. Nevertheless Congress should be commended for requesting an investigation and the Copyright Office commended for their public call for comments. I can't help hoping that this investigation opened Pandora's Box.

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