



9 March 2017

The Librarian of Congress  
Library of Congress  
101 Independence Ave, SE  
Washington, DC 20540

**Re: Register of Copyrights**

Dear Dr. Hayden:

Intellectual Property Owners Association (IPO) writes you regarding the qualifications needed for the individual who will be appointed Register of Copyrights and Director of the United States Copyright Office (Register).

IPO is an international trade association representing companies and individuals in all industries and fields of technology who own, or are interested in, intellectual property rights. IPO's membership includes about 200 companies and more than 12,000 individuals who are involved in the association either through their companies or as inventor, author, law firm, or attorney members. IPO membership spans 50 countries. IPO advocates for effective and affordable IP ownership rights and offers a wide array of services, including supporting member interests relating to legislative and international issues; analyzing current intellectual property issues; providing information and educational services; and disseminating information to the general public on the importance of intellectual property rights.

The Register should be a recognized leader in the field with strong management and leadership skills and in-depth knowledge of copyright law and procedures, as well as significant prior experience with the Copyright Office's services, processes, and employees. The Register must have the ability and commitment to further improve the Copyright Office so that it incentivizes authorship and creativity and spurs innovation, thus contributing to economic growth in America. Enclosed with this letter are IPO's recommendations for background and qualifications that should be possessed by Register candidates.

Thank you for your attention to this matter that is so important to the nation's welfare. Please let us know if we can help in any way.

Sincerely,

Kevin H. Rhodes  
President

President  
**Kevin H. Rhodes**  
3M Innovative Properties Co.

Vice President  
**Henry Hadad**  
Bristol-Myers Squibb Co.

Treasurer  
**Daniel J. Staudt**  
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**Amelia Buharin**  
Intellectual Ventures  
Management, LLC  
**Karen Cochran**  
Shell International B.V.  
**John Conway**  
Sanofi  
**William J. Coughlin**  
Ford Global Technologies LLC  
**Robert DeBerardine**  
Johnson & Johnson  
**Buckmaster de Wolf**  
General Electric Co.  
**Anthony DiBartolomeo**  
SAP AG  
**Louis Foreman**  
Enventys  
**Scott M. Frank**  
AT&T  
**Darryl P. Frickey**  
Dow Chemical Co.  
**Creighton Frommer**  
RELX Group  
**Gary C. Ganzl**  
Evoqua Water  
Technologies LLC  
**Krish Gupta**  
Dell Technologies  
**Heath Høglund**  
Dolby Laboratories  
**Philip S. Johnson**  
Immediate Past President  
**Thomas R. Kingsbury**  
Bridgestone Americas  
Holding Co.  
**William Krovatin**  
Merck & Co., Inc.  
**Peter Lee**  
Thermo Fisher Scientific  
**Elizabeth Ann Lester**  
Equifax Inc.  
**Allen Lo**  
Google Inc.  
**Timothy Loomis**  
Qualcomm, Inc.  
**Thomas P. McBride**  
Monsanto Co.  
**Elizabeth McCarthy**  
Avaya, Inc.  
**Todd Messal**  
Boston Scientific Co.  
**Steven W. Miller**  
Procter & Gamble Co.  
**Micky Minhas**  
Microsoft Corp.  
**Lorie Ann Morgan**  
Gilead Sciences, Inc.  
**Theodore Naccarella**  
InterDigital Holdings, Inc.  
**Douglas K. Norman**  
Eli Lilly and Co.  
**Richard F. Phillips**  
Exxon Mobil Corp.  
**Dana Rao**  
Adobe Systems Inc.  
**Curtis Rose**  
Hewlett Packard Enterprise  
**Paik Saber**  
Medtronic, Inc.  
**Matthew Sarboraria**  
Oracle Corp.  
**Manny Schecter**  
IBM, Corp.  
**Steven Shapiro**  
Pitney Bowes Inc.  
**Jessica Sinnott**  
DuPont  
**Dennis C. Skarvan**  
Caterpillar Inc.  
**Thomas Smith**  
GlaxoSmithKline  
**Brian R. Suffredini**  
United Technologies, Corp.  
**James J. Trussell**  
BP America, Inc.  
**Roy Waldron**  
Pfizer, Inc.  
**BJ Watrous**  
Apple Inc.  
**Stuart Watt**  
Amgen, Inc.  
**Mike Young**  
Roche Inc.

General Counsel  
**Michael D. Nolan**  
Milbank Tweed

Executive Director  
**Mark W. Lauroesch**

## **Qualifications for Register of Copyrights and Director of the United States Copyright Office**

- I. Key Responsibilities of the Register Consistent with 17 U.S.C. § 701:
  - a. Advise Congress on national and international issues relating to copyright, other matters arising under the copyright law, and related matters;
  - b. Provide information and assistance to Federal departments and agencies and the Judiciary on national and international issues relating to copyright, other matters arising under the copyright law, and related matters;
  - c. Participate in meetings of international intergovernmental organizations and meetings with foreign government officials relating to copyright, other matters arising under the copyright law, and related matters, including as a member of United States delegations as authorized by the appropriate Executive branch authority;
  - d. Conduct studies and programs regarding copyright, other matters arising under the copyright law, and related matters, the administration of the Copyright Office, or any function vested in the Copyright Office by law, including educational programs conducted cooperatively with foreign intellectual property offices and international intergovernmental organizations;
  - e. Perform such other functions as Congress might direct, or as might be appropriate in furtherance of the functions and duties specifically set forth in Title 17; and
  - f. Make an annual report to the Librarian of Congress of the work and accomplishments of the Copyright Office during the previous fiscal year. The annual report of the Register of Copyrights should be published separately and as a part of the annual report of the Librarian of Congress.
  
- II. Recommended Background, Qualifications and Experience for the Register:
  - a. Intellectual Property Expertise
    - i. Should be a practicing copyright attorney and must possess a thorough knowledge of copyright law and procedures;
    - ii. Should have a minimum of 15 years of copyright experience, with at least five years of experience running a large organization requiring significant managerial and fiscal responsibility; and
    - iii. Must understand the business aspects of copyright, understand the importance of copyright in spurring creativity, innovation, and economic growth in America, and be able to balance the views of various industry groups and other interested parties.
  
  - b. Leadership and Management Experience
    - i. Should have strong leadership and management skills including experience in setting and communicating strategic direction, effective decision-making and execution, user and customer focus, and ability to inspire employees of a large organization;
    - ii. Must be willing to embrace and implement new technological solutions to address problems and improve efficiencies; and

- iii. Should be familiar with the Copyright Office, including substantial experience with the Copyright Office's registration and recordation services, internal processes and procedures, and the role of its employees within the Copyright Office's organizational structure.
- c. Policy and Advocacy Experience
- i. Must be capable of effectively taking the international stage and advocating for U.S. positions on international copyright matters; and
  - ii. Must be experienced in setting policy, and have proven diplomacy skills. Should possess political acumen and have prior experience in working with government agencies in a highly charged political setting.