



March 20, 2020

Dr. Carla Hayden
The Librarian of Congress
Library of Congress
101 Independence Ave., SE
Washington, D.C. 20559-6000

Via Library of Congress Online Comment Form

RE: Public Input Regarding the Next Register of Copyrights, Docket No. 2020-01

Dear Dr. Hayden:

Intellectual Property Owners Association (IPO) appreciates the opportunity to respond to the request for public input regarding the next Register of Copyrights, published in the Federal Register (Vol. 85, No. 42, Tuesday, March 3, 2020, Docket No. 2020-01). IPO is pleased to provide comments on the qualifications needed for the individual who will be appointed Register of Copyrights and Director of the United States Copyright Office, as well as the top three priorities for the next 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 175 companies and close to 12,000 individuals who are involved in the association either through their companies or as inventor, author, law firm, or attorney members. IPO advocates for effective and affordable IP ownership rights and provides a wide array of services to members, including supporting member interests relating to legislative and international issues; analyzing current intellectual property issues; information and educational services; and disseminating information to the general public on the importance of intellectual property rights.

In IPO's view, the Register should be a recognized leader who has been a member of the copyright law bar, 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 organizational structure. The Register must have the ability and commitment to further improve the Copyright Office so that it continues to incentivize authorship and creativity and spur 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.

In addition, IPO submits that the top three priorities for the next Register should be as follows:

President
Daniel J. Staudt
Siemens

Vice President
Karen Cochran
Shell Oil Company

Treasurer
Krish Gupta
Dell Technologies

Directors
Eric Aaronson
Pfizer Inc.
Brett Allen
Hewlett Packard Enterprise
Estelle Bakun
Exxon Mobil Corp.
Scott Barker
Micron Technology, Inc.
Thomas Beall
Corning Inc.
Brian Bolam
Procter & Gamble Co
Gregory Brown
Ford Global Technologies LLC
Steven Caltrider
Eli Lilly and Co.
John Cheek
Tenneco Inc.
Cara Coburn
Roche, Inc.
Johanna Corbin
AbbVie
Robert DeBerardine
Johnson & Johnson
Buckmaster de Wolf
General Electric Co.
Anthony DiBartolomeo
SAP AG
Bradley Ditty
InterDigital Holdings, Inc.
Daniel Enebo
Cargill, Incorporated
Yen Florczak
Yen Florczak
Louis Foreman
Enventys
Scott M. Frank
AT&T
Darryl P. Frickey
Dow Chemical Co.
Isabella Fu
Microsoft Corp.
Gary C. Ganzi
Evoqua Water
Technologies LLC
Tanuja Garde
Raytheon Co.
Henry Hadad
Bristol-Myers Squibb Co.
Bill Harmon
Uber
Heath Hoglund
Dolby Laboratories
Thomas R. Kingsbury
Bridgestone Americas
Holding Co.
Laurie Kowalsky
Koninklijke Philips N.V.
William Krovatin
Merck & Co., Inc.
Michael C. Lee
Google Inc.
William Miller
General Mills, Inc
Kelsey Milman
Caterpillar Inc.
Jeffrey Myers
Apple Inc.
Ross Oehler
Johnson Matthey
KaRan Reed
BP America, Inc.
Paik Saber
Medtronic, Inc.
Matthew Sarbararia
Oracle Corp.
Manny Schechter
IBM, Corp.
Jessica Sinnott
DuPont
Thomas Smith
GlaxoSmithKline
John Stewart
Intellectual Ventures
Management, LLC
Brian R. Suffredini
United Technologies, Corp.
Gillian Thackray
Thermo Fisher Scientific
Joerg Thomaier
Bayer Intellectual Property GmbH
Mark Wadzyk
Qualcomm, Inc.
Stuart Watt
Amgen, Inc.
Ariana Woods
Capital One

General Counsel
Jeffrey Kochian
Akin Gump Strauss Hauer & Feld LLP

- Modernization of Copyright Office systems and processes;
- Responsiveness to constituents; and
- Attention to ongoing legislative affairs relating to copyright.

We again thank the Library of Congress for permitting IPO to provide comments and would welcome any further dialogue or opportunity to provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Staudt", with a horizontal line crossing through the middle of the letters.

Daniel J. Staudt
President

Enclosure



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;
 - d. 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. Copyright-Related Experience
 - i. Must be or have been a practicing copyright attorney with over ten years of experience in copyright-related matters, and must possess a thorough knowledge of copyright law and procedures;
 - ii. 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; and
 - iii. Should be familiar with the Copyright Office, including substantial experience with the Copyright Office's registration and recordation services and the Copyright Office's organizational structure.

- b. Leadership and Management Experience
 - i. Must 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. Should be willing to embrace and implement new technological solutions to address problems and improve efficiencies; and
 - iii. Ideally, should have substantial experience running a large organization requiring significant managerial and fiscal responsibility.

- c. Policy and Advocacy Experience
 - i. Should be capable of effectively taking the international stage and advocating for U.S. positions on international copyright matters;
 - ii. Should be capable of setting policy and have proven diplomacy skills; and
 - iii. Should possess political acumen and have prior experience in working with government agencies in a highly charged political setting.