

**North Carolina Department of Cultural Resources
Division of Historical Resources
Historical Publications Section**

**Beverly Eaves Perdue, Governor
Linda A. Carlisle, Secretary**

**Office of Archives and History
Jeffrey J. Crow, Deputy Secretary**

19 August 2009

U.S. Copyright Office
Copyright GC/I&R
P.O. Box 70400
Washington, DC 20024-0400

Dear General Counsel:

I am writing in response to your request for comments on mandatory electronic registration for deposit account holders and continued use of deposit accounts.

The Historical Publication Section of the North Carolina Office of Archives and History, a state government agency, annually publishes approximately five new titles and four issues of the *North Carolina Historical Review*, a quarterly scholarly journal now in its eighty-sixth year of publication. Founded in 1903, the Historical Publications Section is the oldest continually operating state historical publishing program in the country. Since October 2007, the section has maintained a deposit account with the U.S. Copyright Office.

Beginning in July 2008, the Historical Publications Section has filed all applications for U.S. Copyright electronically. Completed certificates are received within four months of electronic filing. It has been my experience that the average turnaround from submission of application to receipt of certificates using the traditional paper application process required a minimum of thirteen months. In fact, I am still waiting for several certificates for paper applications filed in late 2007.

I support requiring all deposit account holders to file copyright applications electronically. The eservice Web site is well designed, and the process is simple. Three features of the site are particularly noteworthy:

- (1) Applicants can quickly check the status of submitted applications by logging into the site. The "status block" appears on the first page of the site after the log-in page.
- (2) The template feature saves considerable time during the application process because all of the applicant's contact information is already saved in the template. Only specific information on the new title must be entered.
- (3) The "Save for Later" feature is great for those times when the applicant is constantly interrupted during the application process. One simply clicks on this feature and can return at any future time, starting at the exact place in the process where he/she left. An earlier feature that allowed the applicant to fill out a digital application online, print it out, and submit the resulting paper copy did not allow for information in the digital form to be saved.

I strongly recommend that the U.S. Copyright Office continue to host deposit accounts for applicants. As stated earlier, the Historical Publications Section is a state government agency. Our requests to our department-level business office for a credit card to assist in financial transactions have been turned down repeatedly over the years. Almost all financial transactions in the Department of Cultural Resources (and throughout all North Carolina state government) are still made by printed checks.

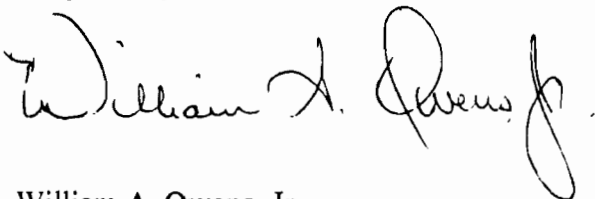
In the past, to request a check to pay for a single copyright registration required that the completed print application along with two different expenditure justification forms be submitted for written approval by four officials in separate divisions of the department. Once all approvals were obtained, all documentation (including the required two deposit copies of the new title) was sent to the business office for a check to be issued. State regulations require that only the business office can distribute the checks to the payees. This Draconian process from first submission of request for payment through receipt of check and application package by the U.S. Copyright Office rarely took less than three weeks.

In July 2007, shortly after I assumed the position of marketing specialist, I discovered that the coworker responsible for filing copyright applications had not filed a single application since September 2001. Copyright responsibility was assigned to my position, and I faced the daunting tasks of filing copyright applications for twenty-four books and twenty-seven issues of the *North Carolina Historical Review* and requesting that the business office issue fifty-four separate checks. Fortunately, I learned of the Copyright Office's deposit accounts and was authorized to open one for Historical Publications.

We discovered another advantage to the deposit account in the past year. As the economy weakened, tighter restrictions were placed on state government spending. Even the simplest transactions required several approvals before they were allowed. By the late spring of 2009, all state government expenditures were denied except those for personnel expenses and utilities. Having the deposit account—a body of funds outside of state government control—allowed Historical Publications to continue to register copyright applications in a timely manner.

The deposit account and electronic filing of applications has greatly simplified the entire copyright application process for the Historical Publication Section of the North Carolina Office of Archives and History.

Respectfully,



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