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June 13, 2012

Mr. David Carson
General Counsel
Office of the Register of Copyrights
101 Independence Avenue, SE
Washington, DC 20059

VIA EMAIL DELIVERY

RE: Exemption to Prohibition on Circumvention of
Copyright Protection Systems for Access Control Technologies

Dear Mr. Carson:

As requested during the June 5, 2012, hearing in the above-captioned proceeding, this letter confirms that the statements made by Dean Marks concerning the DVD Copy Control Association's ("DVD CCA's") willingness to license CSS technology for certain accessibility matters accurately reflect DVD CCA's position on those points.

Specifically, Mr. Marks stated that he believed that

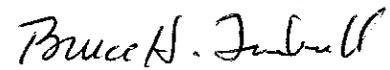
- (i) DVD CCA would offer to create a license for the use of the CSS technology for the purpose of enabling research and development of technology to assist visually and/or hearing impaired persons to enjoy CSS encrypted DVD content;
- (ii) Such a license would be provided free of charge to persons engaged in such research and development activities; and
- (iii) DVD CCA would be prepared to engage in constructive discussions with parties who would engage in both such R&D activities and parties who would produce software products to implement technologies resulting from such R&D activities.

DVD CCA hereby confirms that it makes each of these commitments.

DVD CCA is ready to work with relevant parties to develop a free license for the stated R&D purposes and to work with those same, or other, relevant parties to develop a license for the products that implement such technologies, in each case to the extent that such licenses are necessary in order to use DVD CCA's CSS technology. Accordingly, DVD CCA will contact the proponents of the requested exemptions to work collaboratively on such a license and related activities.

Please contact me if you have any further questions concerning these matters. My email address is Turnbull@bhtlawfirm.com, and my office telephone number is 202-274-1801.

Respectfully submitted,

A handwritten signature in cursive script that reads "Bruce H. Turnbull".

Bruce H. Turnbull
Counsel, DVD Copy Control Association, Inc.