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December 3, 2009

Ms. Maria Pallante Associate Register for Policy and International Affairs US Copyright Office 101 Independence Ave, S.E. Washington, DC

Re: Notice of Inquiry and Request for Comments on the Topic of Facilitating Access to Copyrighted Works for the Blind or Other Persons with Disabilities 74 Fed. Reg. 52507 (Oct. 13, 2009)

Dear Ms. Pallante:

This submission is made on behalf of the Business Software Alliance (BSA) and its member companies.¹ BSA is the voice of the world's commercial software industry and its hardware partners before governments and in the international marketplace.

BSA commends the Copyright Office and the Patent and Trademark Office for their hard work on evaluating the copyright issues related to making works accessible to the blind and other people with disabilities. We appreciate this opportunity to provide our views.

BSA fully endorses the comments submitted on November 13, 2009 by Steven J. Metalitz on behalf of AAP, IFTA, MPAA, NMPA and RIAA. For the reasons stated in that submission, we join the signatory organizations in urging the US government to take a clear stand against the draft treaty, and instead to advocate for more constructive and collaborative WIPO

¹ BSA is the foremost organization dedicated to promoting a safe and legal digital world. Its members represent one of the fastest growing industries in the world. BSA programs foster technology innovation through education and policy initiatives that promote copyright protection, cyber security, trade and ecommerce. BSA members include Adobe, Apple, Autodesk, AVG, Bentley Systems, CA, Cadence, Cisco Systems, Corel, CyberLink, Dassault Systèmes SolidWorks Corporation, Dell, Embarcadero, HP, IBM, Intel, Intuit, McAfee, Microsoft, Minitab, Quark, Quest Software, Rosetta Stone, SAP, Siemens, Sybase, Symantec, Synopsys, and The MathWorks.

initiatives to address the very real challenge of improving access of the blind and visually impaired to copyrighted works.

Thank you for the considerations of our views.

Respectfully submitted,

Jesse M. Feder Director of International Trade and Intellectual Property Business Software Alliance