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The Music Library Association (MLA) respectfully submits the following comment in response to the call for comments, "Section 1201 Exemptions to Prohibition Against Circumvention of Technological Measures Protecting Copyrighted Works," (<http://copyright.gov/1201/>). The MLA is the professional association for music libraries and librarianship in the United States. Founded in 1931, MLA has an international membership of over 800 librarians, musicians, scholars, educators, and members of the book and music trades. Complementing the Association's national and international activities are eleven regional chapters that carry out its programs on the local level. The Music Library Association provides a professional forum for librarians, archivists, and others who support and preserve the world's musical heritage.

This comment addresses the tenth proposed class of exemptions out of 27 created by the Copyright Office in December 2014:

10. Literary works distributed electronically – space-shifting and format-shifting

This proposed class would allow circumvention of access controls on lawfully made and acquired literary works distributed electronically for the purpose of noncommercial space-shifting or format-shifting. This exemption has been requested for literary works distributed electronically in e-books.

Music libraries have a longstanding responsibility to preserve and safeguard access to print works, including those issued on born-digital formats. As e-book readers and file formats become obsolete, and as permissible under Section 108, music librarians need to create preservation copies of textual works. Circumvention of access controls is necessary for this core function of music libraries to continue.