Document Details

Docket ID: COLC-2017-0007

Docket Title: Exemptions To Permit Circumvention of Access Controls on Copyrighted Works *

Document File: [HTML]

Docket Phase: Notice of Inquiry

Phase Sequence: 1

RIN: Not Assigned

Original Document ID: COLC-2017-0007-DRAFT-0240

Current Document ID: COLC-2017-0007-DRAFT-0240

Title: Class_03_Reply_Chatfield

Number of Attachments: 0

Document Type: PUBLIC SUBMISSIONS *

Document Subtype: Comment(s)

Comment on Document ID: COLC-2017-0007-0070

Comment on Document Title: Exemptions to Permit Circumvention of Access Controls on Copyrighted Works

Status: Pending_Post

Received Date: 03/13/2018 *

Date Posted:

Posting Restriction: No restrictions

Submission Type: Web

Number of Duplicate Submissions: 1 *

Document Optional Details

Status Set Date: 03/13/2018

Current Assignee: Nyepan, Dineda (COLC)

Status Set By: Public

Comment Start Date:

Comment Due Date:

Tracking Number:	1k2-91zt-o76d 🌐
Total Page Count Including Attachments:	1

Submitter Info

Comment:	SolaByte Corporation is a technology company that developed security technology that automates disc to digital licensing transactions. The company was founded by storage and security technologists and has been a Partner Developer Licensee of the Ultraviolet system; a founder also has been an active member of the DVD/CCA. We support OmniQ's petition for space shifting because it can be used to greatly improve the security of content stored on optical discs to a higher level of encryption while enabling the same content to become portable to more devices for the benefit of the user. The security technology used to protect content on optical discs is easily defeated by software tools widely available on the web. These tools are a quick Google search away, and their use results in the creation of unencrypted digital copies that can be easily uploaded and published on the web. SolaByte estimates over 13 billion DVD's and Blu-ray discs are in circulation, all with easily hacked security. We ask the registrar to support a 1201 exemption for companies like OmniQ that convert content stored with weak security into an industry approved higher level of security. Such as the list of security technologies that have already been qualified and approved by the members of the Ultraviolet consortium. Members of which include most of the major motion picture studios. We've studied the OmniQ petition and the MPAA and DVD/CCA response. As entrepreneurs ourselves we encourage the Registrar to not interpret OmniQ's lack of a functional prototype to indicate technical in-feasibility of their technology but consider the difficulty of gaining investment funding to create the prototype in advance of clear legal authority. We can attest from our own experience the difficulty in funding prototype development in the absence of legal clarity and we are absolutely certain that if that clarity would come, there would be an abundance of functional prototypes to consider that would signal the dawn of an industry that not only helps content owners monetize their content to its fullest potential but gives the consumer something they can't get from the cloud, the assurance of continued use and access that can only come with possession of the content itself. Like how the landmark ruling in favor of Sony over Universal Pictures that spawned the highly profitable Home Video business, we urge the copyright office to reject the industry's misguided immune response and enable the benefcial new enterprise of DVD conversion. This act will surely fulfill your mission to administer copyright laws for the advancement of the public good and to offer services and support to authors and users of creative works. *🌐
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Cover Page:	📄HTML