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Supp. - Medical Devices - AMT Imaging Solutions LLC

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Comment

AMT Imaging Solutions LLC

Comment in Support of Renewal — Medical Device Diagnosis, Maintenance, and Repair Exemption

Docket No. 2026–4; 17 U.S.C. § 1201; 37 C.F.R. § 201.40(b)(17)

Tenth Triennial Section 1201 Proceeding (2027 Cycle)

Submitter: AMT Imaging Solutions LLC (UEI G8R8SNJJ66Z8)

Authorized representative: Michael Jackson

Organization: AMT Imaging Solutions LLC

Locations: Palm Bay, Florida; Houston, Texas

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AMT Imaging Solutions LLC respectfully submits this comment in support of renewal, without modification, of the current exemption at 37 C.F.R. § 201.40(b)(17) for computer programs that control medical devices or systems, and related data files, when circumvention is undertaken for the diagnosis, maintenance, or repair of the device or system.

AMT is an SBA-certified Service-Disabled Veteran-Owned Small Business (SDVOSB) and Veteran-Owned Small Business (VOSB). We are an independent service organization (ISO). We provide third-party preventive maintenance, repair, and related service for biomedical imaging equipment, including MRI and CT systems, contrast injectors, and MRI chillers and cold-head systems, from bases in Palm Bay, Florida, and Houston, Texas. We are not affiliated with any original equipment manufacturer (OEM).

The need for this exemption continues. Modern imaging systems and related biomedical devices depend on embedded software, diagnostic functions, configuration data, and related data files. Without the ability to lawfully access those programs and files for diagnosis, maintenance, and repair, hospitals and imaging centers lose a competitive service option, and patients face longer downtime when equipment fails. The prior rulemaking record remains a reliable basis for renewal for the next three-year period (October 2027 through October 2030).

On September 1, 2026, the U.S. Court of Appeals for the D.C. Circuit affirmed the Librarian of Congress's adoption of this medical-device repair exemption in *MITA & AdvaMed v. Library of Congress*, No. 25-5328. That decision confirms that the exemption was lawfully adopted. AMT supports streamlined renewal of the exemption as petitioned.

What this comment does not claim: AMT does not claim OEM affiliation or authorization. This exemption does not grant OEM service keys, manufacturer credentials, or access to proprietary tools that OEMs choose to withhold under separate commercial arrangements. It also does not change Veterans Affairs High-Tech Medical Equipment (HTME) sole-source or OEM-authorization procurement rules. AMT seeks only renewal of the existing, narrowly tailored legal safe harbor for noninfringing diagnosis, maintenance, and repair of lawfully acquired medical devices and systems.

For these reasons, AMT Imaging Solutions LLC supports renewal of 37 C.F.R. § 201.40(b)(17) and supports all renewal petitions for 37 C.F.R. § 201.40(b)(17) filed in this cycle.

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Respectfully submitted,
AMT Imaging Solutions LLC
Michael Jackson
Date: September 7, 2026

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Comment Details

Submitter Info

Organization Name
AMT Imaging Solutions LLC



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