

To the United States Copyright Office:

I am a copyright coordinator at Arthur Andersen's Performance and Learning division, which is the training body of Arthur Andersen. Performance and Learning is a corporate educational institution designed for training our staff and partners. We are much like many other corporate educational facilities that are becoming common in the United States today. We do not make a profit ourselves, and although we cannot technically be construed as a nonprofit institution, our primary purpose is education.

We commonly reproduce copyrighted materials for our internal training. Of course, we always seek proper copyright permission when we use copyrighted materials. But at times, we would like to be able to preview the material we may wish to use, in order to determine its suitability for our training environment. The Internet offers a great opportunity for us to preview a lot of works that might not have been available to us before, but this opportunity is only available if we are allowed to circumvent access controls that are otherwise necessary for the protection of those copyrighted works. I'd like to ask that corporate educational institutions be included in the exceptions to the prohibition of circumvention of digital access control measures (section 1201(d)).

Including corporate educational institutions in your list of exceptions would benefit education and commerce, would promote the creation and distribution of knowledge, and would help, rather than hinder, copyright holders. I believe that including corporate educational institutions in this exception is well in keeping with the spirit of other copyright legislation. You can avoid problems by narrowly defining "corporate educational institution" as any organization whose primary function is education, whose purpose in viewing copyrighted material is to assess the potential benefits of that material when its use is later authorized for an educational context, and which does not profit from its circumvention of access controls.

Thanks for the opportunity to give my input.

Todd Laufenberg
Copyright Coordinator
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