William A. Moshier 12730 Misty Grove St. Moorpark, CA. 93021

(805) 370-2623 (voice) (805) 529-1890 (fax) w.moshier@computer.org

This is a comment submitted regarding the Digital Millenium Copyright Act of 1998 (DMCA) as requested by the U. S. Copyright Office.

I have several concerns that I believe must be addressed.

1<sup>st</sup>, I am very concerned about the ability to use material that I have lawfully purchased. I want the ability to reverse engineer the material, for example the DVD CSS playback encryption scheme, so that I may use the material on any machine that I desire. This has nothing to do with illegally copying the material - just with the mechanism to access the material as I desire. An example of abuse in this area is the current lawsuits by the MPAA regarding the DeCSS software decryption. I have no problem with the desire to control or prevent illegal copying and distribution of copyrighted material, just with the efforts to prevent me from using the material that I own as I desire.

2<sup>nd</sup>, as alluded to above, DVD material is a unique medium that should be accessable under any desired platform, as long as the DVD owner abides by the appropriate rules. If he wishes to view DVD material on a Palm Pilot, or other portable computer, and the multimedia industry has not provided the decryption necessary, the owner should be able to design the mechanism with decryption so as to provide the capability he desires, and to share that ability - NOT the DVD material - with others. Note also that 'clean room' reverse engineering has been shown legally over the years to be a protected right. Anyone should have the right to reverse engineer any mechanisms and protocols used to a encrypt or hide material on a purchased medium, such as DVD.

Thank you for taking the time to read these submitted comments. I hope that changes will be made to the DMCA these issues. If not, I and others will be working with our congressmen to revoke the act.

(signed) William A Moshier.