

I am of the opinion that once a service provider initially makes a valid designation the designation should remain effective unless and until the provider has modified it. It is an unreasonable burden to expect the many small service providers to confirm, every two years, that the information submitted remains valid, even if reminders are emailed by the Copyright Office. There are numerous reasons why the email might not get to the proper person on time, or that the proper person might make a calendaring mistake, or forget to confirm the information every two years. The consequences – possible loss of safe harbor protections – is draconian.