

Submission of the ISNI International Agency

In response to:

Library of Congress - US Copyright Office

Notice of Inquiry Docket 2013-2

“Technological Upgrades to Registration and Recordation Functions”

Date: May 20th, 2013

The ISNI International Agency respectfully submits this response to the Notice of Inquiry issued by the Copyright Office on March 22, 2013 concerning Technological Upgrades to Registration and Recordation Functions.

The ISNI International Agency recommends the use of the International Standard Name Identifier (ISNI) within the Copyright Office’s systems.

ISNI is an international standard published by the International Organization for Standardization as ISO 27729. The standard is, under the supervision of ISO, administered by the ISNI International Agency (www.isni.org), which has been set up as a non-profit entity by a consortium of bodies representing libraries, collective management organizations and identifier agencies. A list appears at Annex 1.

An ISNI typically identifies a party (though creators with pseudonyms may have several). The identifier is assigned by an ISNI Registration Agency once it is satisfied that the link between identifier and identity is unique. Thereafter it can be used instead of matching textual names with the attendant problems of ambiguity, error, linguistic variances and transliteration problems.

ISNI is a young identifier, being published in 2012 but it has already assigned 6.4 million codes by using the carefully curated data held by more than 50 sources including libraries (in particular from the Virtual International Authority File – VIAF), collective management organizations, research organizations, professional societies and encyclopedias.

ISNI is neutral as to the licensing or business model used and is as applicable to the individual licensing of works as it is to their collective licensing. The ISNI International Agency is committed to the creation of more registration agencies as the system grows and to integrating their data into a single ISNI registry.

The ISNI International Agency believes that implementing ISNI in the US copyright registration and recordation systems will:

1. Aid the Copyright Office in managing its data by allowing records where the rights owner is the same to be grouped and records where the rights owners are different to be distinguished (disambiguated),

2. Aid those searching the records to find wanted information more quickly and without noise,
3. Aid those having located the appropriate record to contact the owner of the relevant rights more effectively, thereby reducing the number of works “orphaned” because the owners of the relevant rights cannot be found.

Additionally the use of an international standard identifier such as ISNI will, if included in the public database held by the Copyright Office, allow its interoperability with databases whether crowd-sourced or operated by collective management organizations or commercial entities. This will allow innovative services to be created, generating better awareness and consumption of copyrighted works, thereby promoting “the progress of science and useful arts”.

To achieve this objective, the ISNI International Agency recommends:

- That wherever the Copyright Office’s systems allows the input of the name of a party (whether a natural person or a corporate entity) which will own or manage the rights in the work being registered, it should allow for the entry of an ISNI,
- That when an ISNI is provided, it should be checked against the ISNI registry to ensure that it has been accurately entered,
- That the provision of an ISNI should (after appropriate notice and consultation with relevant stakeholders) become mandatory when in the future the adoption of ISNI has become sufficiently high.

Though the last of these recommendations cannot be implemented immediately, it will be very inexpensive to design a system that accommodates it now (and rather more expensive to add it later to an established system).

The ISNI International Agency stands willing to cooperate with the Copyright Office to ensure that the implications of these recommendations are understood and that their implementation is as straightforward as possible.

Annex 1

Members of the ISNI International Agency:

The **Bibliothèque nationale de France (BnF)** is one of the largest research and public libraries in the world collecting and conserving the national heritage entrusted to its care, in whatever form, for the use of all researchers, students and professionals. Today its heritage collections encompass all areas of culture and knowledge in a great variety of languages and illustrate the library's encyclopaedic nature through all kinds of materials. The BnF offers access to its digital library Gallica <http://gallica.bnf.fr>, which now contains over 1,6 million digitised documents: manuscripts, sound materials and music score, books, images and over 400,000 newspapers issues, in French and other languages. They cover all domains of knowledge, with a specific focus in literature and history. Together with these collections, all in public domain, Gallica

gives access to digitised documents belonging to French partner libraries as well as a set of copyrighted documents in collaboration with the French Publishers Association, some publishers and e-retailers. The BnF is a founding member of The European Library consortium and is contributing to Europeana. It is involved in multiple European projects, such as ARROW, which aims at facilitating the access to copyrighted items in the respect of author rights. For more information: www.bnf.fr. For information on ISNI: Anila Angjeli anila.angjeli@bnf.fr +33 (0) 1 5379 5395.

The **British Library** is the national library of the United Kingdom and one of the world's greatest research libraries. It provides world-class information services to the academic, business, research and scientific communities and offers unparalleled access to the world's largest and most comprehensive research collection. The Library's collection has developed over 250 years and exceeds 150 million separate items representing every age of written civilisation. It includes: books, journals, manuscripts, maps, stamps, music, patents, photographs, newspapers and sound recordings in all written and spoken languages. For more information: www.bl.uk Contact: Ben Sanderson - ben.sanderson@bl.uk +44 (0) 1937 546 126.

The **Conference of European National Librarians (CENL)** is a foundation under Dutch law with the aim of increasing and reinforcing the role of national libraries in Europe, in particular in respect of their responsibilities for maintaining the national cultural heritage and ensuring the accessibility of knowledge in that field. Members of CENL are the national librarians of the member states of the Council of Europe. The conference currently consists of 49 members from 46 European countries forming the CENL Board. The conference pursues its objectives by means of annual membership meetings as well as initiatives and support of research and development activities and joint projects. The topics which are discussed at the annual meetings and are worked on in working groups and projects were already identified at the very first meeting and evolved with the development of technology and library organisation: Harmonisation and innovation of national policy concerning libraries; implementation of new information technology in the libraries; standardisation of data structure and communication interfaces within a European network; preservation and conservation of important collections in Europe, including long-term preservation of digital objects. CENL website: www.cenl.org Contact: CENL Secretary, Karin Varloot Knudsen, e-mail: karin.varloot-knudsen@bnf.fr; cenl@bnf.fr +33 (1) 53 79 83 79.

CISAC – the International Confederation of Societies of Authors and Composers – aims to increase both the protection and the promotion of creators' rights worldwide. As the leading worldwide network of authors' societies, CISAC enables collective management organisations to seamlessly represent creators across the globe and ensure that royalties flow to authors for the use of their works anywhere in the world. To this end, CISAC provides the highest business, legal and IT standards to protect creators' rights and to support the development of the international network of collective management societies. Founded in 1926, CISAC is a non-governmental, not-for-profit organisation with worldwide headquarters in France and regional offices in Chile, Hungary, Singapore, and South Africa. Contact: Sara Stephenson International Communications Manager, CISAC sara.stephenson@cisac.org

The **International Federation of Reproduction Rights Organisations (IFRRO)** is an independent, not-for-profit organisation representing the interests of collective management organisations in the field of text and image based works. These organisations are known as Reproduction Rights Organisations (RROs). [Active in every continent 86 of IFRRO's 140 member organisations are RROs, 54 are national and international publisher and author, including visual creator, associations.](#) IFRRO's global network of members contributes to the facilitating of the widest possible legal access to published, copyright protected literary, visual and musical works for the public. RROs administer reproduction and other relevant rights, including certain forms of digital uses, in copyright text- and imagebased works on behalf of both publishers and authors including visual artists. These rights are normally referred to as reprographic rights. RROs also play a key role in the development of cultural diversity by helping to set up the legal and administrative frameworks necessary for the growth of local publishing industries. IFRRO partners organisations such as WIPO and UNESCO to undertake copyright awareness, capacity building and training activities. For more information: www.ifrro.org Contact: James Boyd - JamesBoyd@ifrro.org + 32 2 234 62 64.

SCAPR, a non-profit making organization based in Brussels, Belgium, is an international platform for the development of the practical cooperation between performers' collective management organisations (PMOs) in order to improve the exchange of data and performers' rights payments across borders. The organisation represents 49 performers' collective management societies from 39 countries. Its aim is to further improve the efficiency of management of rights and the conclusion of bilateral agreements. The organisation develops strategies, formats and administrative systems in relation to collecting and distributing payments in particular in the new technical environment. SCAPR also develops and manages databases and systems of performers and performances for a more efficient international distribution of the collected payments (IPD and VRDB), under the supervision of its IT Council. SCAPR provides assistance for the exchange of information between PMOs, on such items as administrative procedures, legal proceedings/arbitrations, collecting procedures, published tariffs and distribution schemes. For more information www.scapr.org.

Founded in 1967, **OCLC** is a non-profit, membership, computer library service and research organization dedicated to the public purposes of furthering access to the world's information and reducing library costs. More than 72,000 libraries in 170 countries have used OCLC services to locate, acquire, catalogue, lend, preserve and manage library materials. Researchers, students, faculty, scholars, professional librarians and other information seekers use OCLC services to obtain bibliographic, abstract and full-text information when and where they need it. OCLC and its member libraries cooperatively produce and maintain WorldCat, the world's largest online database for discovery of library resources. Search WorldCat.org on the Web. Contact – Janifer Gatenby janifer.gatenby@oclc.org

ProQuest connects people with vetted, reliable information. Key to serious research, the company has forged a 70-year reputation as a gateway to the world's knowledge - from dissertations to governmental and cultural archives to news, in all its forms. Its role is essential to libraries and other organizations whose missions depend on the management and delivery of complete, trustworthy information. ProQuest's massive information pool is made accessible in research environments that accelerate productivity, empowering users to discover, create, and share knowledge. An energetic, fast-growing organization, ProQuest includes the Bowker®, Dialog®, ebrary®, and Serials Solutions® businesses and notable research tools such as RefWorks®, Pivot, and the Summon® service. The company is headquartered in Ann Arbor, Michigan, with offices around the world. For more information: www.proquest.com Contact: Beth Dempsey - beth@bethdempsey.com - +44 (0) 248-349-7810