



May 16, 2013

Submitted Electronically

Library of Congress  
U.S. Copyright Office  
101 Independence Avenue, S.E.  
Washington, D.C. 20559-6000

**Re: Comments of LegalZoom.com, Inc. in Response to the Copyright Office's Notice of Inquiry Concerning Its Information Technology Platforms [Docket No. 2013-2]**

Pursuant to the Notice of Inquiry published by the U.S. Copyright Office (the "Office") in the Federal Register, 78 FR 17722 (March 22, 2013), LegalZoom.com, Inc. ("LegalZoom") submits these Comments regarding technological upgrades.

LegalZoom is the nation's leading provider of personalized, affordable online legal solutions for families and small businesses. Founded more than 12 years ago, LegalZoom has helped over two million Americans obtain legal documents. LegalZoom is not a law firm and does not provide advice or recommendations about possible legal rights, remedies, defenses, options, selection of forms or strategies. It provides consumers with access to independent attorneys through its prepaid legal services plans and offers an easy-to-use, online self-help service through which customers can create their own legal documents.

As a general matter, many providers of online services have made significant improvements in how they interact with and provide information to customers in the online environment, resulting in a better customer experience. LegalZoom is a frequent and regular user of the Office's Electronic Copyright Office ("eCO"), and is pleased that the Office is identifying and evaluating potential improvements and technical enhancements to the information technology platforms that support its registration and recordation functions, including its online registration system.

#### Electronic Deposit Upload / Updates

The eCO currently provides customers seeking to file a copyright application with a Case Summary page, which provides details such as the case number, title of the applied-for work, type of the case, claim status, and certain other information. It also features an "Upload Deposit" tab that customers use to electronically provide the Office with deposit copies of a work in connection with a copyright application. However, the Case Summary page does not allow users

to view the deposit copy once it is uploaded or check it for completeness before it is submitted, and does not provide immediate confirmation of the upload or submission.

Such shortcomings are problematic for eCO users. For example, users frequently encounter difficulties when trying to upload a deposit copy, and often need to make multiple attempts before an upload is successful. Although the eCO sends an automated e-mail to users who experience an upload error, in many instances such e-mails are received well after a user has made several additional attempts to upload the deposit copy and are not clear which attempt failed. The confusion is compounded by the fact that users cannot easily confirm whether the Office received the entire deposit copy before completing a submission. This makes it difficult for a user to determine which upload efforts failed and succeeded, and how much of a deposit copy was received by the Office.

eCO users would benefit from the Office's improvement of the "Upload Deposit" and "Updates" functionality and the information made available to users in these sections of the Case Summary page. Proposed improvements include: (1) adding a functionality that allows users to view the uploaded deposit for completeness before it is submitted, (2) providing a means for users to delete an incomplete or improperly uploaded file, (3) shortening the time lag from between the time when a deposit copy is uploaded and the time it is reflected in the "Updates" section, and (4) adding more information about what the Office has received, such as the size of the file received, the date/time of the submission and the ability to view the uploaded deposit in the "Updates" section. Such improvements would help the Office avoid unnecessary delays, alleviate the need for the Office to contact (or be contacted by) eCO users experiencing errors, and provide an overall better user experience to its customers.

#### Hybrid Submissions

For hybrid submissions – such as copyright applications submitted online followed by a hard-copy of the deposit – eCO users would be better served if the Case Summary page provided the date and time when a user's physical deposits were received by the Office. The eCO does not currently provide a means for users to confirm that the Office received their hard-copy deposits. Even with tracking information supplied by delivery services such as FedEx and UPS, some packages go astray despite confirmation of delivery from these services. This was a problem during the days when the Office received more paper applications than it did electronic, and remains a problem today, especially during times where inclement weather causes postal delays. Because hard-copy deposits are typically shipped to the Office with shipping slips that feature bar codes for easier tracking, scanning capabilities could allow real-time updates to the eCO. Such an improvement could help ease the anxiety of copyright applicants who are unsure if deposit copies were received by the Office.

### Registration Case Status / Open Cases

In the “Open Cases” tab in the eCO, it would be helpful to provide users with more information regarding the status of a copyright application. For example, if a copyright examiner reviewing an application encounters a problem with an open case, it would be helpful if the status field indicated that there is a “problem” with the application. Such a status update would be a useful indicator for users trying to determine the progress of applications. In addition, if a registration has been issued, a status update that provides “registered” instead of or in addition to “closed” may help users determine, prior to receipt of a Certification of Registration, whether an application has been registered as opposed to rejected.

### Payment and Transaction History

eCO users would benefit from a feature that provides access to details concerning all transactions and payments, whether by credit card or deposit account, that were made in connection with a user’s account. Providing payment and transaction history information would help eCO users by allowing them to keep track of transactions in real time and identify any double payments or failed payments. In addition, if a payment attempt resulted in an error message rather than a payment confirmation message, users would be able to access the payment and transaction history to determine whether or not a payment was successful. Such an enhancement would cut down on user anxiety related to payment issues and is especially helpful during times when the eCO is experiencing technical difficulties or network issues.

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We thank the Office for the opportunity to comment on technological upgrades, and look forward to the improvements that the Office ultimately implements. We would be honored to make ourselves available for any questions the Office may have.

Sincerely,

Ken Friedman  
Vice President, Legal & Government Affairs  
LegalZoom.com, Inc.