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Deposits of Visual Art at the Copyright Office

Numerous visual-art industries have expressed concern with contemplated copyright legislation dealing with so-called “orphan works.” Their concern emanates from the fact that many, if not most, of their creations (which they take pains to register with the Copyright Office) will be automatically deemed “orphaned,” because the Copyright Office’s visual-art archive is not searchable, making it practically impossible to tie a particular piece of registered visual-art work to its owner. Visual-art organizations have therefore proposed to tie the effective date of the contemplated legislation to the date on which it becomes possible to conduct image-recognition searches of the Copyright Office’s archive of visual art.¹

Some Congressional offices have received inaccurate information regarding the existence and scope of Copyright Office’s archive of visual art, and, as a result, may have incorrectly assessed the feasibility of the visual-art industries’ proposal. The purpose of this paper is to provide factual information regarding deposits of visual art at the Copyright Office, which demonstrates that a publicly searchable database of registered visual art is not only feasible but long-overdue. The failure of the Copyright Office to create an image-searchable database of visual art only serves to perpetuate and exacerbate the “orphan works” problem. Specifically, the paper demonstrates:

- Visual-art deposits held by the Copyright Office are public records
- The public is unable to review visual-art deposits or even make a single copy for research purposes
- Visual-art deposits are computer-coded by the Copyright Office, providing for ready database inclusion
- The Copyright Office is required to retain visual-art deposits
- The quantity of visual-art deposits held by the Copyright Office is significant but manageable
- The Copyright Office is required to publish catalogs of copyrighted works
- The Copyright Office generally rejects digital submissions of published visual art, even in its long-awaited electronic filing system

¹ See separate paper entitled “The Case for an Image-Recognition Database at the Copyright Office.”

I. Visual-Art Deposits Are Public Records

The Copyright Office is a division of the Library of Congress, which is in existence to “acquire, organize, preserve, secure and sustain for the present and future use of Congress and the nation a comprehensive record of American history and creativity and a universal collection of human knowledge,” with the top priority “to make its collections maximally accessible to Congress, the government and the public.”²

The Copyright Office in particular is an “office of public record,” and legislatively required to maintain all records regarding copyright registration, including the copyrighted works themselves, and make them available for public inspection. 17 USC Section 705(b).³

When a person submits a creation to the Copyright Office for registration, he submits an application form, a fee, and a copy of the to-be-registered work, which is called “the deposit.” According to the Copyright Office, a “deposit” is “the copy of an original work of authorship that is placed in the Copyright Office to support the claim to copyright in the work or to meet the mandatory deposit requirement of the 1976 Copyright Act.” The Copyright Office is fully subject to the Administrative Procedure Act, except that the reproduction and distribution of copyright *deposits* are governed by Copyright Office regulations. See 17 USC Section 701(e). Under Copyright Office regulations, deposits are part of the public record and may be selected by the Library of Congress for its collections, which are of course open to the public.⁴

As will shortly become relevant, when submitting a copyright application, the owner notes on the application form whether the deposit has been “published,” as that term is confusingly described in the Copyright Act. Publicly displaying photographs in a gallery, jewelry in a store, paintings on a theater stage, or textiles at a trade show does not constitute “publication.”⁵ The term “publication,” as that word is used in the Copyright Act, has nothing to do with a private-public divide.

In response to visual art industries’ proposal for an image-recognition database, some individuals have claimed that deposits are “private,” allegedly because the copyright owner submitting the paperwork to the Copyright Office hasn’t consented to it being a publicly accessible

² <http://www.loc.gov/about/faqs/>

³ 17 USC Section 705 states, “the Register of Copyrights shall ensure that records of deposits, registrations, recordations, and other actions taken under this title are maintained, and that indexes of such records are prepared” and “such records and indexes, as well as the articles deposited in connection with completed copyright registrations and retained under the control of the Copyright Office, shall be open to public inspection.” Further, “upon request and payment of the fee...., the Copyright Office shall make a search of its public records, indexes, and deposits, and shall furnish a report of the information they disclose with respect to any particular deposits, registrations, or recorded documents.” That said, “copies of deposited articles in the Copyright Office are authorized to be provided only under conditions specified by Copyright Office regulations.” 17 USC Section 708. See also <http://www.copyright.gov/help/faq/faq-what.html#solicitation> (“Copyright Office records, however, are public records, which means anyone may come to our office and inspect them.”).

⁴ <http://www.copyright.gov/help/faq/definitions.html>

⁵ <http://www.copyright.gov/circs/circ1.html#pub>

record.⁶ The previously cited statutes show this argument to be meritless. Moreover, this privacy argument is quickly disregarded by pointing to the copyright application form signed and submitted by every copyright owner, which includes an explicit Privacy Act disclosure, stating, "The principal uses of the requested information are the establishment and maintenance of a public record and the examination of the application for compliance with the registration requirements of the copyright code." (emphasis added).

II. Copyright Office Regulations Prohibit Public Review or Duplication of Visual-Art Deposits

Although deposits are public records, a member of the public is prevented from reviewing any deposit unless he physically travels to the Copyright Office in Washington, DC. In contrast, aware that most people in this country cannot physically travel to Washington, DC to review a copyrighted work, the Library of Congress abolished this requirement for its own archive many years ago by implementing a duplication service for out-of-town patrons.⁷

In addition, the Copyright Office refuses to provide even a single copy of a visual-art deposit, at any price or under any circumstances, unless the requestor either produces written authorization from the copyright owner (a catch-22 in the orphan-works situation given that the owner is unknown) or a letter from an attorney asserting that the copyright is involved in a lawsuit (a condition that can't be satisfied when one is simply trying to determine the ownership status).⁸ By doing this, the Copyright Office closes the door to anyone who tries to determine the owner of an "orphaned work" by comparing it to a piece of visual art on file with the Copyright Office (which will necessarily reflect the copyright owner's identity), even if the searcher believes he knows the registration number.⁹ (Although, in most cases, all that a searcher is likely to have is a copy of the visual art, with the owner identification obscured or removed).

There is nothing in the Copyright Act that requires such restricted access to and copying of visual-art deposits. Indeed, various laws seemingly make these bureaucratic regulations impermissible. See 17 USC Section 705. Certainly, the public interest is not well-served by the Copyright Office's refusal to permit review and copying of visual-art deposits.

The Copyright Office has occasionally asserted that it would be facilitating copyright infringement by permitting a member of the public to copy, for any reason, a deposit. In making this assertion, the Copyright Office ignores the fair-use principle, as well as the numerous duplication machines located at the Library of Congress for patron use, and the long history of duplication

⁶ In the unusual circumstance in which a copyright owner wishes to keep the deposit private, because it constitutes a legally protectible trade secret, the Copyright Office has regulations permitting the redaction of trade secret or other confidential business information. 27 C.F.R. sec. 202.20(c)(2)(vii)(A)(2).

⁷ 37 CFR Section 201.2(b)(1). See also Copyright Office Circular 6, "Obtaining Access to and Copies of Copyright Office Records and Deposits."

⁸ 37 CFR Section 201.2(d)(2).

⁹ The Copyright Office has other policies that make it difficult to determine the identity of a copyright owner. For example, the Copyright Office requires a copyright owner wishing to file a change-of-address form to pay a minimum \$80 fee (roughly double the registration fee itself), and that fee does not even cover the address change for all of his registered works. <http://www.copyright.gov/fls/sl30a.html>

services provided by the Library of Congress and other libraries pursuant to authorization under the Copyright Act.¹⁰ The Library of Congress even goes so far as to mail – or email – a copy of any copyrighted works in its archive to any member of the public that completes the request form and pays a minimal fee.

More to the point is the explicit statute permitting the Copyright Office to copy the deposits. “The Register of Copyrights is authorized, for specific or general categories of works, to make a facsimile reproduction of all or any part of the material deposited.....” 17 USC Section 704(c).

And, although it is duplicative of earlier enacted statutes, the “orphan works” legislation proposed by several visual-art industries and organizations includes a specific provision providing immunity to anyone making copies of a piece of visual art as part of an effort to identify the copyright owner.¹¹

III. Visual-Art Deposits Are Already Computerized for Ready Retrieval

As a legislatively mandated office of public record, the Copyright Office of course has document management procedures in place, although the specific procedures have changed from time to time. The Copyright Office’s document management system is meticulous, and the records are stored in secure locations, where the materials cannot be easily stolen, vandalized, or harmed by atmospheric conditions.

In particular, for some time, the Copyright Office has electronically imaged paper materials immediately upon receipt, and used optical character recognition (OCR) to digitally capture data from image files. Perhaps most notably, the Copyright Office has coded and computerized all contemporary visual art deposits, as demonstrated in Exhibit B, which shows the computerized bar code affixed to the copyrighted work by the Copyright Office. Such computer bar codes substantially lessen the administrative burden associated with retrieving and organizing deposits for the contemplated database. These computer bar codes on the deposits themselves are further aided by other document management codes. For example, the Copyright Office assigns codes to its records to indicate where the deposit is located or if it was destroyed. See <http://www.copyright.gov/records/datacode.html> (record shows “copy location code,” with one of the following designations: D = At least one copy (in whole or in part) was sent to the copyright deposit warehouse, F = Copies stored in copyright deposit warehouse for the full copyright term, L = No copy sent to the copyright deposit warehouse).¹²

The Copyright Office’s visual-art deposits are also already formatted in a way that would make their assembly into a computer database relatively simple. Not surprisingly, the Copyright Office has precisely regulated the format for visual-art deposits.¹³ Pursuant to Copyright Office rules,

¹⁰<http://www.loc.gov/preserv/pds/cond.html>

¹¹This immunity is similar to copyright legislation enacted in Year 1996, 17 USC Section 121, which authorizes certain copies and distributions (without permission from the copyright owner) exclusively for use by blind or otherwise disabled persons.

¹² Copyright Office records also include a code for the Catalog of Copyright Entries (the number 5 denominates visual art) and a code for retrieval from the Copyright Office warehouse (such as “T” for textiles).

¹³ See Copyright Office Circulator 40a, “Deposit Requirements for Registration of Claims to Copyright in Visual Arts Material.” <http://www.copyright.gov/circs/circ40a.html#id>

the vast majority of visual art, for both two- and three-dimensional objects, is submitted by way of color photocopy or photograph, rather than by submission of the tangible piece of copyrighted work itself. These photocopies and photographs could be readily scanned and uploaded into a database.

IV. The Copyright Office Retains Many Visual-Art Deposits

As noted in the legislative history and as reflected by common sense, the deposits of visual art are of “indisputable utility to future historians and scholars” and “would avoid the many difficulties encountered when copies needed for identification in connection with litigation or other purposes have been destroyed.” Thus, “the basic policy behind Section 704 [of the Copyright Act] is that copyright deposits should be retained *as long as possible*, but that the Register of Copyrights and the Librarian of Congress should be empowered to dispose of them *under appropriate safeguards* when they decide that it has become *necessary* to do so.” (emphasis added).

Thus, when these two individuals determine that the Copyright Office has retained deposits “for the longest period considered practicable and desirable,” then and only then (subject to certain restrictions), they have joint discretion to order their “destruction or other disposition.” See 17 USC Section 704(d). One of the restrictions is that no unpublished work can be destroyed during its term of copyright, unless the Copyright Office makes a copy of the deposit and retains that copy. 17 USC 704(d); 37 CFR 201.23. This has been the law since at least Year 1976.

In contrast, published works can be destroyed by the Copyright Office so long as they have been retained “as long as possible” and such destruction is “necessary.” According to the official in charge of these records, since Year 1997, the Copyright Office has routinely destroyed published visual-art deposits after only 15 years, due to perceived space limitations.¹⁴ Prior to 1997, the Copyright Office had a variety of fluctuating policies regarding published deposit retention.¹⁵

Such destruction makes little sense in a world of scanning software and microfiche capability, particularly when the Copyright Office has already affixed computerized bar codes to the deposits.

Notably, even if the Copyright Office is unable to digitize all visual-art deposits from the last 30 years (as proposed by several visual-art organizations), because the Copyright Office has destroyed some of those records, certainly the Copyright Office can create a database of those deposits that it does retain. Such a database – which would include all unpublished works as well as all published works from the last 15 years -- will capture the more economically valuable designs, which are especially at risk for erroneous “orphan work” classification.

Further, the visual-art deposits in the official hands of the Copyright Office can be supplemented by the various works that the Copyright Office has transferred to the Library of Congress, the National Archives, or other libraries, as provided under the Copyright Act.

¹⁴The Copyright Office does not appear to have any formal regulation or written policy regarding its deposit destruction, and does not mention its deposit-destruction program to copyright groups or on its website. In a provision unknown to the vast majority of copyright owners (and copyright lawyers), if the copyright owner wants the Copyright Office to retain even a single deposit for the term of copyright, he is required to make a special application to the Register of Copyrights and pay an additional \$135. 17 USC Section 704(e).

¹⁵According to Tracie Coleman, Head of the Certification and Documents Section of the Copyright Office (the individual responsible for retention of all copyrighted deposits).

Specifically, the Copyright Act requires the Copyright Office to make any registered published work available for transfer to the Library of Congress, or to any other library. 17 USC Section 704(a).¹⁶ For unpublished works, they are available for transfer to the Library of Congress, the National Archives, or a federal records center. 17 USC Section 704(a). Even if an unpublished work is transferred to one of these repositories, the Copyright Office is required to retain a copy. 17 USC Section 704(d).¹⁷

V. **The Copyright Office Has a Significant But Manageable Quantity of Visual-Art Deposits**

Any claims that the Copyright Office database proposal is pointless because no such records exist or exist in only small or insignificant numbers should be disregarded. As shown in Exhibit A, the total number of visual-art deposits collected by the Copyright Office since Year 1976 is slightly over two million.¹⁸ Moreover, the Copyright Office has apparently destroyed a huge amount of published visual-art deposits (as discussed above) – thus, the total quantity of visual art deposits still possessed by the Copyright Office is actually only 1.5 million.¹⁹

This number pales in comparison with the digitization efforts undertaken by other governmental agencies, or in comparison to the Google project to digitize library books. At no charge to the government, Google has already digitized over 7 million patents issued by the U.S. Patent Office. Google has also been digitizing “tens of thousands of books every week,” aiming to digitize the world’s entire 32 million collection within ten years.²⁰ As part of this project and at no charge to the libraries, Google is working at major universities to digitize their extensive library collections -- it makes perfect sense for Google to work with the nation’s library, the Library of Congress (under which the Copyright Office operates), as well. Amazon has also digitized hundreds of thousands of works, and Carnegie Mellon reports that it has already digitized over 1.5 million. And a number of other companies and foundations, including Open Content Alliance (founding member, Yahoo), Reuters, IBM, and the Andrew W. Mellon Foundation, have financed digitization projects around the world, again without charge to the targeted archive.²¹

¹⁶ To speak of “transfer” from the Copyright Office to the Library of Congress is a misnomer because the Copyright Office is a part of the Library of Congress.

¹⁷“In the case of unpublished works, no deposit shall be knowingly or intentionally destroyed or otherwise disposed of during its term of copyright unless a facsimile reproduction of the entire deposit has been made a part of the Copyright Office records as provided by subsection (c).”

¹⁸ The legislation proposed by certain visual-art industries provides for a Copyright Office database of deposits for only the past 30 years.

¹⁹ This number is the total of (total unpublished works since Year 1976) and (total published works for last 15 years). See Exhibit A.

²⁰“Google’s Moon Shot: The Quest for the Universal Library,” *The New Yorker*, by Jeffrey Toobin, February 5, 2007. See also <http://books.google.com>.

²¹ “History, Digitized (and Abridged),” *The New York Times*, by Katie Hafner, March 10, 2007.

VI. The Copyright Office Is Required to Publish Copyright Catalogs

The Copyright Office is required to compile and publish catalogs of registered copyrights. See 17 USC Section 707(a). Further, the Copyright Office “has the authority to publish compilations of information....and other material he or she considers to be of value to the public.” See 17 USC Section 707(b). These catalogs and publications “shall” be furnished to libraries and offered to the public at prices based on the cost of reproduction and distribution. See 17 USC Section 707(c). Further, as the Year 1976 legislative history notes, what constitutes a Copyright Office catalog is flexible so that “new electronic devices now becoming available will avoid waste and result in a better product.”

Notwithstanding this legislative mandate, the Copyright Office has never produced a catalog (electronic or otherwise) of the visual-art deposits, which would be so immensely beneficial to the public at large as well as academic scholars and copyright owners. Notably as well, the Copyright Office already has express authority to charge users of the contemplated database an appropriate access fee in order to fund the development and creation of the database. 17 USC Section 707(c).

VII. The Copyright Office’s Digitization Plans, Budget, and Electronic Filing System Ignores and Thereby Perpetuates “Orphan Works” Problems

Both the Library of Congress (under which the Copyright Office operates) and the National Archives have continuing and ambitious digitization efforts. Seven years ago, Congress asked the Library of Congress to lead a collaborative project, called the National Digital Information Infrastructure and Preservation Program, in recognition of the importance of preserving content for future generations. Congress passed special legislation (Public Law 106-554) appropriating \$100 million to the Library of Congress to lead this effort in collaboration with other organizations and institutions from both the public and private sectors. Similarly, the National Digital Library Program is the Library of Congress' initiative to make widely available digitized versions of its unique American collections, including hundreds of thousands of images from the Library of Congress' incomparable map and photography collections.²²

Notably, Google has donated three million dollars already to the Library of Congress to digitize its collection, and has also provided technical resources for this effort. Moreover, Google is working on its own at the Library of Congress to digitize its collection.²³

Yet the Copyright Office has never even considered digitizing its archive of visual art.

Ironically, in its Year 2008 budget submitted to Congress on March 22, 2007, the Copyright Office itself requested one million dollars “to fund the digitization of 70 million pre-1978 copyright records,” with the express goal of increasing public access to copyrighted works. It is worth noting

²² <http://www.loc.gov/about/faqs/>

²³ “Google’s Moon Shot: The Quest for the Universal Library,” *The New Yorker*, by Jeffrey Toobin, February 5, 2007. See also <http://books.google.com>. See also “Google pushes US states to open public records,” *CNN.com*, May 1, 2007 (reporting that “Google is helping state governments make reams of public records that are now unavailable... easily accessible...” and that “these newly available records will not be exclusive to the search engine”).

that the vast majority of the Copyright Office's funding comes from fees that the Copyright Office charges the public.²⁴

Significantly, the Copyright Office's new electronic filing system, first initiated seven years ago, is being tested with a small sample of users now.²⁵ Yet, this system has no mechanism by which the public can review or search electronically submitted deposits, despite the ease with which that could be accomplished. Moreover, the Copyright Office is not even developing such functionality, and has consistently refused to do so.

Further, the Copyright Office will not allow electronic submissions of published visual art, unless the work was "born digital" (i.e., first published in digital form), which almost never happens with visual art (e.g., stationery, textile, puppets, paintings). "Although the Copyright Office is changing its submission procedures for the registration of claims to copyright, at this time there is no change in the deposit requirements for published works. With respect to published works, the registration requirements for deposit copies...existing in physically tangible media [e.g., textiles, ceramics, stationary, paintings] will remain the same."²⁶ In other words, even if a visual-art company files a registration electronically, the Copyright Office still requires the copyright owner to deliver a hard-copy of the deposit, which of course can not be as readily included in a searchable database.²⁷

In short, Copyright Office practices and procedures have contributed to and exacerbated the problem of "orphan works" in visual art. It is time for Congress to change this tide, by requiring the Copyright Office to implement an image-recognition database of visual art.

²⁴ Copyright Office Fiscal Year 2004 Annual Report, p. 55,
<http://www.copyright.gov/reports/annual/2004/management.pdf>

²⁵ The Trademark Office has had an electronic filing system in place for many years, and even before then the federal courts launched their own electronic filing systems.

²⁶ <http://www.copyright.gov/fedreg/2007/72fr36883.html>

²⁷ The Copyright Office's resistance in this regard is no doubt linked to the statutory requirement that the deposit be the "best edition" (17 USC Section 407), but the Copyright Office is responsible for defining what that means. See 17 USC Section 101 (The 'best edition' of a work is the edition... that the Library of Congress determines to be most suitable for its purposes."). In fact, current regulations mandate that almost all visual art, whether two- or three-dimensional, be deposited as a photocopy or photograph, rather than the tangible item itself. There is no reason why such submissions cannot be permitted digitally.

Exhibit A

Visual Arts Registrations as a Percentage of Copyright Registrations (1976 - 2005)*

Year	Total Registrations	VA Registrations (Published + Unpublished)	Percent of VA to Total Regs.	VA Registrations for Published Works	Percent of VA Reg. Which are Published Works	VA Registrations for Unpublished Works
1976	410,969	32,415	7.80%	No Data	No Data	
1977	452,702	35,381	7.90%	No Data	No Data	
1978	331,942	31,017	9.34%	26,099	84.14%	4,918
1979	429,004	35,258	7.52%	26,893	76.27%	8,365
1980	464,743	41,153	8.85%	30,516	74.15%	10,637
1981	471,178	39,794	8.44%	36,601	91.98%	3,193
1982	468,149	42,288	9.03%	32,326	76.44%	9,962
1983	488,256	37,411	7.66%	24,383	65.18%	13,028
1984	502,628	42,795	8.51%	29,280	68.42%	13,515
1985	540,081	50,043	9.26%	33,491	66.92%	16,552
1986	561,208	51,258	9.13%	35,620	69.49%	15,638
1987	582,239	57,193	9.82%	38,727	67.71%	18,466
1988	565,801	60,428	10.07%	39,664	65.63%	20,764
1989	619,543	66,285	10.70%	43,911	66.24%	22,374
1990	643,602	76,718	11.92%	52,447	68.36%	24,271
1991	663,684	79,225	11.94%	53,215	67.17%	26,010
1992	606,253	77,900	12.85%	53,253	68.36%	24,647
1993	604,894	78,720	13.01%	55,564	70.58%	23,156
1994	530,332	86,112	16.24%	56,520	65.63%	29,592
1995	609,195	99,550	16.34%	30,613	30.75%	68,937
1996	550,442	91,640	16.65%	65,109	71.05%	26,531
1997	569,226	89,635	15.75%	59,022	65.84%	30,613
1998	558,645	96,083	17.20%	66,403	69.01%	29,680
1999	594,501	93,617	15.75%	62,779	67.06%	30,838
2000	515,612	85,839	16.65%	56,218	65.49%	29,621
2001	601,659	99,906	16.61%	64,289	64.35%	35,617
2002	521,041	79,991	15.35%	51,003	63.76%	28,988
2003	534,112	93,444	17.50%	64,882	69.43%	28,562
2004	661,469	107,775	16.30%	63,223	58.66%	44,552
2005	531,720	82,517	15.51%	47,321	57.34%	35,196
Total:	16,184,830	2,041,391	12.61%	1,299,372	65.83%	674,223

Total of VA Reg. Published Works (1991-2005) + VA Reg. for Unpublished Works (1978-2005) 1,523,637

*Statistics compiled from the US Copyright Office's Annual Reports (1976-2005). <http://www.copyright.gov/reports/>

EXHIBIT B



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Date: May 9, 2005

LIBRARY
OF
CONGRESS

Megan Gray
1300 19th St NE ste 600
Washington DC 20036

COPYRIGHT
OFFICE

101 Independence
Avenue, S.E.

~~This is in reply to your letter of concerning VA 1-243-904 a work titled -~~

Our minimum fee for black-and-white photocopies of copyright records (including deposits/recorded documents/correspondence) is 50 cents per page or exposure. \$0

Note: All photocopies are black and white unless color is specifically requested. Our minimum fee for photocopies in color is \$1 a page.

Washington, D.C.
20559-6000

Deposit(s)	page(s)
Correspondence	pages
Recorded Documents	pages

Our fee for searching to locate and retrieve, if possible, copyright deposits and files is \$80 per hour or fraction thereof. Please note that payment of this fee does not guarantee that deposits and files can be located. \$80

Total required to process request(s) \$80.00

We acknowledge receipt of \$0; however, an additional fee of \$80 is needed to process your request(s). Upon receipt of \$80, we will process your request.

- You must return this letter with the required fee within 60 days or your request will be cancelled and the Copyright Office will retain any submitted fees equivalent to one hour of service or the minimum fee set by statute for the service to cover administrative costs.
- Please make all remittances payable to Register of Copyrights
- Please allow approximately 8 weeks for a response to your request.
- Fees are subject to change without notice.

Sincerely yours,
T.Pace
Certifications and Documents Section
U.S. Copyright Office, LM 402
(202) 707-6787

C&D Estimate

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