



May 21, 2014

Karyn Temple Claggett
Associate Register of Copyrights and Director of Policy and International Affairs
United States Copyright Office
101 Independence Ave SE
Washington, D.C. 20540

Dear Associate Register Claggett:

The National Council of Textile Organizations (NCTO) is pleased to comment on the U.S. Copyright Office's request regarding Orphan Works and Mass Digitation.

The National Textile Association (NTA) and American Manufacturing Trade Action Coalition (AMTAC), which previously represented the upholstery fabrics industry, have been participants in Orphan Works matters since the initial discussion began in 2006. Both organizations were merged into the National Council of Textile Organizations (NCTO) in April 2013.

NCTO represents the entire supply chain of the textile industry from fibers to finished textile products, and from machinery manufacturers to energy suppliers. Our comments are submitted primarily on behalf of our Upholstery Fabrics Committee which is comprised of members who manufacture cover fabrics for use by the furniture and other industries.

Attached are two items which address our major concerns with Orphan Works:

- Position Paper on HR 5439 – Orphan Works Legislation
- Textile Industry Concerns With S. 2913, The Shawn Bentley Orphan Works Act

Because of the importance of protecting the designs and intellectual property associated with textiles and end products associated with these textile products, we request to be a participant in all activities associated with Orphan Works.

We will be pleased to respond to any question.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. I. N. T. S. T.', written in a cursive style.

Augustine Tantillo
President