October 8, 2015

Re: Docket Number 2015-3, Mass Digitization Pilot Program

Dear Mr. Amer:

The Internet Archive thanks you for working to help create more digital access to books and other analog materials.

The Internet Archive’s mission is to provide universal access to all knowledge. We have extensive experience in collecting, archiving, and providing free public access to millions of books and other works in collaboration with hundreds of libraries. We understand that the Copyright Office is trying to help library digitization efforts by proposing a temporary extended collective licensing (ECL) program that would allow us, and non-profit organizations like ours, to negotiate and purchase licenses to digitize and make available some subset of published books, photographs, and possibly other kinds of works as well. We write to offer our response to this proposal as an organization well-versed in digitization and digital access projects.

When our founder and digital librarian, Brewster Kahle, coined the term “orphan works,” he intended to refer to all materials, including books, photographs, films, music, and other creative works, that are out of print and no longer commercially available, but still regulated by copyright. Over time, the term “orphan work” has come to have a much narrower definition, limited to works whose owner cannot be located or contacted after a “diligent search” has been conducted. However, under this system, “works are deemed orphan only after an unsuccessful and often costly search is conducted.” The Report proposes ECL for projects “not amenable to a

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1 We note along with many other commenters on this issue that in the United States many forms of digitization and public access are already legally permissible as fair use. See Authors Guild, Inc. v. HathiTrust, 755 F.3d 87 (2d Cir. 2014) at 97-104 (holding that digitization of books to create a full-text searchable database, to enable print-disabled access to the book’s contents, and to preserve the books was fair use).

2 He coined the term in the context of a case that challenged the constitutionality of the Copyright Term Extension Act. Kahle v. Gonzales, 487 F. 3d 697 (9th Cir. 2007) (explaining that orphan works are “works that allegedly have little or no commercial value but remain under copyright protection.”)

solution premised on a user’s diligent search for individual copyright owners,”—so-called “mass digitization.” However, since libraries and other organizations encounter potential orphan works during almost any digitization project, large or small, it seems most would be forced to utilize the ECL framework, even if the collection at issue may ultimately contain a large number of orphans.

Many of the Copyright Office’s assumptions about mass digitization appear to be based on Google’s book scanning project—a project in which a single entity managed and subsidized the digitization of millions of books. This project was unique, and is unlikely to be replicated, especially given the litigation that resulted. Similarly, many European digitization efforts have been managed by a strong, centralized national library. For example, the Nordic model relies on the National Library of Norway to manage digitization and license fees are paid for by taxpayers. However, an ECL model based on centralized digitization projects like those managed by Google or a national library does not make sense for modern digitization efforts in the United States.

Instead, modern U.S. digitization efforts look very different from these centralized models. Over the course of the past few years, libraries, archives, and communities have been experimenting with various approaches to digitizing materials and making them publically available. At the Internet Archive, for example, we have partnered with hundreds of libraries to digitize over two million books, with some libraries contributing a few volumes and others contributing many hundreds, into an aggregated Open Library platform. Many others have digitized on their own.

We do not believe the proposed ECL program would work for this kind of decentralized undertaking. We do not have a single collection, located in a single place, under the management of one institution. Instead, institutions, organizations, and individuals all contribute materials that are then digitized in various scanning locations around the country. At the outset of the Open Library project, we did not know what materials our collection would ultimately contain, and in fact, the collection will likely continue to grow and change over the years. Determining ex ante what sort of license fees would apply to such a collection, who would be responsible for paying the fees, and who may access the collection, would be implausible.

The Open Library project is an example of a modern, decentralized digitization project. Google Books does not seem to be a good basis from which to extrapolate solutions for other projects. In fact, it may be misleading to discuss the Google Books settlement outside of the context of the lawsuit that spawned it. The license in that case was not negotiated by willing sellers and willing buyers. Rather, it was an attempt to get out of protracted and expensive litigation that, as of this writing, is still ongoing. In that case, each party had many lawyers working to engineer the settlement agreement. It seems unrealistic to assume that libraries, archives, and other nonprofit entities (let alone distributed communities across the web) who are engaging in digitization will be able to mount anything close to Google’s bargaining power, even

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4 REPORT, page 72.
5 The Copyright Office candidly admits that the ECL program is inappropriate for orphan works, since it would ultimately be a “system to collect fees, but with no one to distribute them to.” REPORT, page 50. Our concern then, is that this program may end up merely becoming a system for taxing libraries, with the proceeds going to fund private collecting societies instead of being distributed to authors and publishers.
6 An English language description of The National Library of Norway’s Digitization project can be found at: http://www.nb.no/English/The-Digital-Library/Digitizing-policy.
7 See Appendix A for a list of contributing institutions.
8 See https://openlibrary.org/.
if allowed to collectively bargain. Further, the court in the Google Books case rejected the settlement partly because the Authors Guild failed to adequately represent the interests of academic authors in the negotiations.\(^9\) This suggests that the settlement was not beneficial to all authors—demonstrating the thorny issues that are likely to arise under an ECL program in the U.S.

Moreover, the ECL proposal seems to limit digital access to those who largely already have it (i.e., to institutions with members who can pay) rather than expanding access to underserved communities without large institutional libraries nearby. Further, the program’s narrow focus on published literary works, embedded pictorial and graphic works, and photographs leaves out important cultural materials such as sound recordings, audiovisual materials, and unpublished works. The ECL proposal also prejudges the types of uses that may be made of the digitized materials, rather than allowing for experimentation over time to reveal what is possible. In short, putting in place a short-term ECL solution would leave many people without access and would leave the Internet Archive and the libraries we work with without any more certainty than we have today. Accordingly, we believe the Copyright Office would benefit from seeing how digitization efforts are evolving before assuming that ECL can solve the problems we encounter.

There are many digitization programs that are working rather well under current conditions. The Internet Archive’s books, music, and video community collections, for example, have millions of works available to the public with certain restrictions in place. We have also leveraged a digitize-and-lend system where the same protections used to protect licensed works are used on these digitized materials. This has worked for many years for over 100 contributing libraries. Nonprofit libraries are also engaging in format shifting. For instance, software that was originally distributed on floppy disk is now being moved into digital files to be functional on modern computers. Format shifting of books has also been useful in offering constrained access to material traditionally available in libraries.

Many organizations who offer digital access to books, including the Internet Archive, follow a simple notice and takedown system. This system works quite well. In some cases, authors come forward to let us know they are thrilled to see their works in circulation for the first time in many years. Sometimes, rightholders are initially uncomfortable when they come across their work online, but when we explain the nonprofit and educational purpose of the collection, they come to agree that it is preferable to allow their work to be available to current and future generations. And in some cases, the rightholder simply does not wish to have her work made digitally available. In those cases, we remove it.

This ad hoc system has been working well. But it could work even better if there were an explicit safe harbor that would mitigate damages in cases where those making digitized works available could follow a simple notice and takedown protocol. Although digitization projects encounter many types of works that are not easily cataloged, books are somewhat easier to work with because each one comes with an ISBN, LCCN, or Worldcat ID. Because it can be difficult to tell which copyrighted work(s) might be included in any given edition of a book, identifiers help a great deal to identify the availability of a specific edition. As such, ISBNs and other identifiers could be used to help look up whether a digital version is for sale to the library, and could be as part of a system to figure out whether works should be digitized and made available.

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\(^9\) *Authors Guild v. Google Inc.*, 770 F. Supp.2d 666, 679-80 (S.D.N.Y. 2011) (concluding that “there is a substantial question as to the existence of antagonistic interests between named plaintiffs and certain members of the class”).
A notice and takedown safe harbor makes sense for a variety of reasons. First, the DMCA has established the basic norm of notice and takedown—people understand how this works. Many companies, platforms, and institutions use notice and takedown to manage issues beyond copyright, such as trademark and privacy concerns. Further, as the Report itself makes clear “public access to ... an orphan work by a library or museum occurs without any kind of monetary compensation for the owner, so it is appropriate, should the owner re-appear, that the remedy be the removal of the work from public view rather than reasonable compensation, which in many cases would be zero.”10 The Internet Archive agrees with this assessment, and would favor the creation of a notice and takedown safe harbor for those who make digitized works available.

In sum, if we get this right we can reach the goal of universal access to all knowledge. Please let us know how we might help.

Respectfully Submitted,

The Internet Archive

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10 REPORT, page 66.
Appendix A - List of Contributing Institutions

A.C. Buehler Library
ASC - York University Libraries
Aberdeen City Libraries
Abraham Lincoln Presidential Library
Academy of Natural Sciences of Drexel University
Acton Memorial Library
Agnes Scott College
Agriculture and Agri-Food Canada – Agriculture et Agroalimentaire Canada
Alachua County Library District
Alamance County Public Libraries
Alcohol and Tobacco Tax and Trade Bureau Library
Alleghany County Public Library
Allen County Genealogical Society of Indiana
Allen County Public Library
Allen County Public Library Genealogy Center
American Field Service
American Museum of Natural History Library
American Printing House for the Blind
American University Library
Amherst College Library
Anabaptist Mennonite Biblical Seminary Library
Anderson University Thrift Library
Andover Newton Theological School
Angus Council
Annali d’Italianistica
Architecture Landscape Design - University of Toronto
Archives - University of Toronto
Archives and Special Collections
Archives of the Sisters of Service
Arkansas State University
Armstrong Atlantic State University
Arsenal Technical High School and The Indianapolis Public Library
Ashbury College
Ashville-Buncombe Technical Community College
Ashland University Archives
Assumption College Library
Astronomy - University of Toronto
Athens State University
Attleboro High School
Auburn University Libraries
Augusta State University
Balmoral Hall School
Barnard College
Barton College
Bates College
Bay Path College
Bedford Public Library
Belk Library
Belmont Abbey College
Belmont Public Library
Belmonte Middle School
Benedictine Library
Bennett College
Benson Museum
Berea College
Berkeley Public Library
Bethany College
Bethany Theological Seminary
Beverly Public Library
Biblioteca Ludwig von Mises
Biblioteca do Ministério da Fazenda no Rio de Janeiro
Billerica Public Library
Birmingham-Southern College
Black Hawk College Libraries
Bloomsburg University
Booth Library
Bora Laskin - University of Toronto
Boston Architectural College Library
Boston College Libraries
Boston Public Library
Boston Symphony Orchestra Archives
Boston University Libraries
Bowdoin College Library
Bradley University Library
Brandeis University Libraries
Branksome Hall
Braswell Memorial Library
Brentwood College School
Brethren Heritage Center
Brethren Historical Library and Archives
Brevard College
Bridgewater College
Bridgewater State University
Brigham Young University Hawaii
Brigham Young University-Idaho
British Library
Brock Historical Museum
Brock University
Brockton Public Library
Brooklyn Public Library
Broward College Archives and Special Collections
Brown University Library
Bryan College Library
Bryn Mawr College Library
Bucknell University
Bureau of Land Management Library
Burlingame Public Library
Bushnell-Sage Library
Charleston Southern University Library
Charlevoix Public Library
Charlotte Hawkins Brown Museum
Charlotte Mecklenburg Library
Chatham County Public Library
Chatham University
Chelmsford Public Library
Chelsea Public Library
Cheng Yu Tung East Asian Library - University of Toronto
Chicago State University Library
Children's Hospital Boston Archives
Christian Herald Association
Church History Library
City College of San Francisco
City University of Hong Kong
City of Boston Archives
City of Boston Parks Commission
City of Fort Wayne Board of Public Works
City of Vancouver Archives
Claire T. Carney Library
Clamor Magazine
Clarion University of Pennsylvania Libraries
Clement C. Maxwell Library at Bridgewater State University
Clemson University Libraries
Cleveland Community College
Coahoma Community College
Coastal Carolina University
Coleman Karesh Law Library
College of Chemistry and the Lawrence Hall of Science
College of William and Mary
College of the Albemarle
College of the Atlantic
College of the Holy Cross Archives and Special Collections
Colorado Christian University
Colorado College
Colorado State Publications Library
Columbia International University
Columbia Theological Seminary
Columbia University Libraries
Columbus State University Libraries
Computer History Museum
Concord Free Public Library
Concordia University Chicago
Congregational Library
Connecticut State Library
Copiah-Lincoln Community College
Cornell University Library
Covenant College
Cowley County Community College
Creighton University Archives
Crestview Public Library
Cumberland County Public Library
Cumberland University
Curry College
Dana Hall School
Danbury Public Library
Danville Area Community College
Davidson College
Davie County Public Library
Dedham High School Library
Delaware Valley College
Delta State University
Denison Library
Denison University Libraries
Dentistry - University of Toronto
Department of Astronomy and Astrophysics - University of Toronto
Digitised by courtesy of the Mitchell Library
Disciples Divinity House of the University of Chicago
Dominican University
Dorothy H. Hoover Library
Downsview - University of Toronto
Drew University
Drew University and the General Commission of Archives and History for the United Methodist Church
Drexel University College of Medicine Legacy Center
Duke Divinity School Library
Duke University Libraries
Duke University Medical Center Archives
Duke University Medical Center Library
Durham County Library
Durham Technical Community College
Duxbury Free Library
Earth Sciences - University of Toronto
East Bay Regional Park District
East Bend Public Library
East Bridgewater High School Library
East Bridgewater Jr./Sr. High School Library
East Bridgewater Public Library
East Central Community College
East Mississippi Community College Libraries
Eastern Kentucky University Library
Eastern Nazarene College
Eastham Historical Society
Eastham Public Library
Eckerd College
Edgecombe County Memorial Library
Edinburgh City Libraries and Information Services
Edinburgh University Library
Edison State College
Education Centre Library
Elizabethtown College
Elkin Public Library
Elms College
Elmwood School
Elon University
Emmanuel - University of Toronto
Emmerich Manual High School and The Indianapolis Public Library
Emory University Libraries
Endocrine Society
Engineering - University of Toronto
Environmental Services & Library Systems
Episcopal Divinity School
Erskine College
Erving Public Library
Euclid Public Library
Everglades National Park
Executive Library
F. Franklin Moon Library at the State University of New York College of
Environmental Science and Forestry
FAO Regional Office for Africa
Fairfield University
Fairmont State University
Fall River Public Library
Falvey Memorial Library
Family History Library
Farmville Public Library
Faulkner Hospital
Federal Transit Administration - 50th Anniversary Document Collection
Field Museum of Natural History
Field Museum of Natural History Library
Fisher - University of Toronto
Fisher College
Fiske Public Library
Fitchburg Public Library
Fitchburg State University
Flint Public Library
Florence Darlington Technical College
Florida International University
Florida Memorial University
Florida Southern College
Florida State University Libraries
Fordham Law Library
Forsyth County Public Library
Fort Sumter National Monument and Charles Pinckney National Historic Site
Framingham Public Library
Framingham State University
Francis A. Countway Library of Medicine
Francis Marion University
Frederick E. Parlin Memorial Library
French Institute
Friends Historical Collection
Frost - York University Libraries
Furman University
G.R. Little Library
Gannon University
Gardner-Webb University
Garrett-Evangelical Theological Seminary
Gaston College
Gaston County Public Library
Georgia Historical Society
Georgia Southern University
Gerstein - University of Toronto
Getty Research Institute
Gettysburg College
Glasgow School of Art
Glasgow School of Art Library
Gleason Public Library
Gloucester Lyceum and Sawyer Free Library
Goucher College
Governor's Academy
Governors State University Library
Grace College & Theological Seminary
Graduate Theological Union
Grafton Public Library
Grand Chapter Royal Arch Masons of Canada in the Province of Ontario
Granite Falls Transportation and History Museum
Granville County Public Library
Great Smoky Mountains
Greenville Technical College Library
Grey Highlands Library
Gumberg Library
HHS Office of Minority Health Resource Center
Hackney Library
Halifax Grammar School
Hamilton Historical Society
Hampden-Sydney College
Hanson Public Library
Harnett County Public Library
Harold B. Lee Library
Harpers Ferry Center
Harpeth Hall School
Harriet Irving Library
Harry Butowsky Collection
Harvard Botany Libraries
Harvard School of Public Health
Harvard University
Hatfield Historical Museum
Hatfield Public Library
Haverford College Library
Health Sciences Library
Hege Library
Henderson Institute Historical Museum
Heritage Lodge No. 730 A.F. & A.M.
Heritage Research Center
Heritage Research Center at High Point Public Library
Hesburgh Library
Hewes Library
Hickory Public Library
High Point Museum
Highlands Historical Society
Hinds Community College Libraries
Hingham Public Library
Historical Medical Library
History of Modern Biomedicine Research Group
Hocutt-Ellington Memorial Library
Holmes Public Library
Holyoke Public Library
Houston Public Library
Howard Colman Library
IIT Chicago-Kent College of Law
IUPUI University Library
Icahn School of Medicine at Mount Sinai
Illinois College of Optometry Library
Illinois Mathematics and Science Academy
Independence Seaport Museum
Indiana Academy of Science John Shepherd Wright Memorial Library
Indiana State Library
Indiana University
Indiana University Robert H. McKinney School of Law
Indiana University of Pennsylvania Libraries
Indianapolis City Directory Collection
Indianapolis Public Library
Information and Library Science Library
Innis College Library
Input Reports and Research Archive Project
Institute for Advanced Study
Institute of Botany
Intermountain Region Museum
Internet Archive
Internet Archive Hopewell Junction
Iowa State Library
Iowa State University
Ipswich Public Library
Iredell County Public Library
Itawamba Community College
Ivy Tech Libraries of Central Indiana
J. Edgar & Louise S. Monroe Library
J. Murrey Atkins Library
J.A. Jones Library
Jack and Leslie Hamann
Jacob Edwards Library
Jamaica Plain Historical Society
Jamaica Plain Tuesday Club
James A. Gibson Library
James B. Duke Memorial Library
Lehigh University Libraries
Lenoir-Rhyne University
Lenox Historical Society
Lenox Library
Leo Baeck Institute Archives
Leo Baeck Institute Library Books Collection
Leo Baeck Institute Library Monograph Collection
Leo Baeck Institute Library Periodical Collection
Leo Baeck Institute Archives
Lesley University
Lewis & Clark Community College and the National Great Rivers Research and Education Center
Lexington Library
Liberty High School
Libraries Without Walls
Library and Archives Canada - Bibliothèque et Archives Canada
Library and Information Science Library - University of Toronto
Library of Congress
Library of IBCAS
Library of the Health Sciences
Library of the Marine Corps
Library of the YIVO Institute for Jewish Research
Lick-Wilmerding High School
Lincoln College
Lincoln County Public Library
Lincoln Financial Collection
Lincoln Financial Foundation Collection
Lincoln Public Library
Lindenwood Cemetery and Fort Wayne Genealogical Society
Little Flower Academy
Livingston College
Livingstone College
Local History Centre
Local Studies Department
London School of Hygiene & Tropical Medicine Library & Archives Service
Longfellow's Wayside Inn
Longwood University
Los Altos Hills
Louisiana House of Representatives
Louisiana State University Libraries
Lowell Cemetery
Lowell Mason House
Loyola University Chicago Libraries
Lucius Beebe Memorial Library
Lunenburg Massachusetts Historical Society
Lycoming College
Lycoming County Historical Society
Lyrasis Members and Sloan Foundation
MBLWHOI Library
MIT Libraries
MRTS Online
Mammoth Cave National Park
Manchester University Archives and Brethren Historical Collection
Mansfield University of Pennsylvania
Mars Hill College
Marshall Brooks Library
Mary Baldwin College
Maryville College
Massachusetts College of Liberal Arts
Massachusetts Horticultural Society Library
Massachusetts Maritime Academy
Massasoit Community College
Mathematical Sciences - University of Toronto
Mattapoissett Free Public Library
Matthews Heritage Museum
Mauney Memorial Library
McCann Technical School
McDowell County Public Library
McKendree University
Medfield Public Library
Media History Digital Library
Medical College of Georgia
Medical University of South Carolina
Meekins Library
Melrose High School Library Resource Center
Memorial Hall Library
Memphis University School
Mennonite Library and Archives
Meredith College
Methodist Library
Methodist Theological School in Ohio
Methodist University
Michael L. Hébert
Michael Mikel
Middle Tennessee State University
Middleborough Public Library
Milligan College
Millsaps College
Milner Library
Ministry of the Environment
Minnesota Historical Society
Misericordia University
Mississauga - University of Toronto
Mississippi Delta Community College
Mississippi Law Journal
Mississippi State University Libraries
Missouri Botanical Garden
Mitchell Community College
Montana State Library
Montclair State University
Montgomery County Public Library
Montreat College
Moore County Public Library
Morris College
Morris Library
Morse Institute Library
Mount Airy Public Library
Mount Olive College
Mount St. Mary’s College Libraries
Mount Wachusett Community College
Ms Jacqueline Nguyen
Mugar Memorial Library
Museum of the Albemarle
Music - University of Toronto
Music Library
NASA
NC State Parks
NCSU Libraries
NFB Jernigan Institute
NIH Library
NIST Research Library
Nancy DeStefanis
National Emergency Training Center Library
National Federation of the Blind
National Library of Australia
National Library of Medicine
National Library of Scotland
National Technical Information Service
National Transportation Library
National Yiddish Book Center
National-Louis University Library
Natural History Magazine
Natural History Museum Library
Naval Postgraduate School
Nevins Memorial Library
New Bedford Whaling Museum
New Bern-Craven County Public Library
New England College of Optometry Library
New England Conservatory Library
New England Province of the Society of Jesus (Jesuits) Archives
New Haven College Library
New Jersey State Library
New York Botanical Garden
New York Public Library
New York University
New York University. NYU Health Sciences Library. Medical Archives
New York-Presbyterian/Weill Cornell Medical Center
Newton Free Library
Niagara College
Niles Essanay Silent Film Museum
North Adams Public Library
North Carolina Agricultural and Technical State University
North Carolina Central University
North Carolina Collection
North Carolina Conference
North Carolina Digital Heritage Center
North Carolina Humanities Council
North Carolina Room
North Carolina Wesleyan College
North Central College
North Davidson Library
North Georgia College & State University
North Georgia College and State University
North Greenville University
Northeastern University
Northern Illinois University
Northwest Mississippi Community College
Northwestern State University
Northwestern University
Norton Public Library
Norwell Public Library
Norwood High School Library
O'Reilly
OCLC Library
OISE - University of Toronto
OXFAM
Oakwood University
Oberlin College Library
Oglethorpe University
Ohio State University Libraries
Ohio University Libraries
Old Jamestown School Association
Olivet Nazarene University
Olivia Raney Local History Library
Ontario Legislative Library
Ontario Ministry of Natural Resources Library
Ontario Ministry of the Environment
Ontario Ministry of the Environment and Climate Change
Ontario Workplace Tribunals Library
Original Bear Creek Primitive Baptist Association
Osgoode Hall Law School Library
Osmania University
Outer Banks Group: Cape Hatteras National Seashore
Overmountain Victory National Historic Trail
PIMS - University of Toronto
Pacifica Radio Archives
Page-Walker Arts and History Center
Palm Beach State College
Palmer Public Library
Pasquotank County Library
Paterson Free Public Library
Patrick Carnerie
Paul Pratt Memorial Library
Paul V. Galvin Library
Payne Theological Seminary
Peabody Institute Library
Peace College
Pearl River Community College Garvin H. Johnston Library
Peggy McCormick
Pender County Public Library
Peninsula Library System
Penn State University
Pennsylvania College of Technology
Pennsylvania Horticultural Society
Perkins School for the Blind
Perkins School of Theology
Perry Memorial Library
Personal Collection
Pfeiffer Library
Pfeiffer University
Philadelphia College of Osteopathic Medicine Library
Philadelphia Museum of Art
Phillips Academy
Phillips Academy Andover
Pickering College
Piedmont College Libraries
Pikeville Independent Schools Alumni Association and Foundation
Pink Triangle Press
Pitt Community College
Pitts Theology Library
Pittsburgh Theological Seminary Library
Plainville Public Library
Plymouth Public Library
Potomac State College of West Virginia University
Prairie State College Library
Pratt - University of Toronto
Prelinger Library
Presbyterian College
Presbyterian Historical Society
Princeton Public Library
Princeton Theological Seminary
Princeton Theological Seminary Library
Princeton University Archives
Private collection of the works of the Great School of Natural Science
Project Physics Collection
Prometheus Research Library
Provincial Archives of Alberta
Public Library of Brookline
Public.Resource.Org
Purdue University Libraries
Queen's University Archives
Queen's University Library
Queens University of Charlotte
Quincy University
R. U. Sirius Archives / Mondo 2000 History Project
ROM - University of Toronto
Randolph Community College
Randolph County Public Library
Raynham Public Library
Reading Public Library
Realview.com.au
Redwood Library and Athenaeum
Regina Elmansouri
Regis - University of Toronto
Regis University Library
Rend Lake College
Renfrewshire Libraries
Rex Healthcare Library
Rice University
Richmond Community College
Richmond County Public Library
Robarts - University of Toronto
Robarts - University of Toronto AAC-5017
Robarts University of Toronto
Robarts - University of Toronto
Robarts- University of Toronto
Robbins Collection
Robbins Memorial Library
Robeson Community College
Robeson County Public Library
Rock Valley College
Rockingham Community College
Rockingham County Public Library
Rocky Mountain College
Rollins College
Roman Catholic Archdiocese of Toronto
Ronald Williams Library
Roosevelt University Archives
Roslindale Historical Society
Rowan University Libraries
Rowan-Cabarrus Community College
Roxbury Community College Library
Royal Botanic Gardens Kew Library
Royal College of Physicians
Royal College of Physicians in Edinburgh
Royal College of Surgeons of England
Royal Conservatory Antwerp
Royal Conservatory Brussels
Royal Ontario Museum
Royal St. George's College
Rush University
Rutgers University Libraries
Ryerson University Library Special Collections
SC State Parks
Saguaro National Park
Saint Augustine's College
Saint Leo University
Saint Mary's College of California
Saint Mary's School
Saint-Paul University
Salem College
Salem State University
Saltus Grammar School
Salve Regina University Library
Samford University Library
Samuel P. Hayes Research Library
San Diego Air and Space Museum Library and Archives
San Diego Natural History Museum
San Diego Public Library
San Francisco Mime Troupe
San Francisco Public Library
San Francisco Public Library
San Francisco Public Utilities Commission Resolutions and Minutes
San Joaquin County Historical Museum
San Joaquin County Historical Society
Sangamon Valley Collection
Santa Clara University Library
Saugus Public Library
Sauk Valley Community College Learning Resources Center
Savannah State University
Scarborough - University of Toronto School of Government Library
School of Theology
Scituate Town Library
Scott - York University Libraries
Scranton Public Library
Selwyn House School
Sequoia and Kings Canyon National Parks
Sharon Public Library
Shaw University
Shawnigan Lake School
Shepherd University
Simmons College Archives
Sisters of Mercy Archives
Sloane Art Library
Smith College Libraries
Smithsonian Institution Libraries
Solomon R. Guggenheim Museum Library
Somerville Public Library
Sonoma County Wine Library
South Ayrshire Libraries
South Piedmont Community College
South Suburban College
Southeast Regional Office
Southeastern Baptist Theological Seminary
Southeastern Community College
Southeastern Regional Vocational Technical High School
Southern Adventist University McKee Library
Southern Baptist Historical Library & Archives
Southern Illinois University Edwardsville
Southern Illinois University School of Medicine
Southern Methodist University
Southwestern University
Spaulding Library
Special Libraries Association San Francisco Bay Region Chapter
Spoon River College Library
Spring Hill College
Springfield Free Public Library
Springfield Technical Community College
St Michaels University School
St. Andrew's College Archives
St. Andrews Presbyterian College
St. Augustine's - University of Toronto
St. John's College Health Sciences Library
St. Joseph's College
St. Mary's College of Maryland Library
St. Michael's College - University of Toronto
Staley Library
Stanly County Museum
Starr Library
State Library and Archives of Florida
State Library of Massachusetts
State Library of North Carolina
State Library of Ohio
State Library of Pennsylvania
State Transportation Library of Massachusetts
Statistics Canada
Stephen F. Austin State University
Sterling and Francine Clark Art Institute Library
Stetson University
Stirling Council Library and Archives Service
Storrs Library
Storrs Public Library
Stoughton Public Library
Strathcona Tweedsmuir School
Sturgis Library
Substance Abuse Librarians and Information Specialists (Suffolk University
Surrey Archaeological Society
Surry Community College
Susquehanna University
Sutton Public Library
Swampscott Public Library
Swarthmore College Library
Sweet Briar College
TIL
Taylor University
Tennessee Wesleyan College
UNEP-WCMC
USGS Patuxent Wildlife Research Center
Ukrainian Canadian Students' Union
Umass Lowell Libraries
Union College
Union Presbyterian Seminary
Union University
Unitarian Universalist Church of Reading
United Farmers' Historical Society
United States Copyright Office
United States Department of State Bureau of International Organization Affairs
United States Holocaust Memorial Museum
Univ. of Mass Medical School
University of California Libraries
Universal Digital Library
University of Alabama at Birmingham
University of Alberta
University of Alberta Archives
University of Alberta Libraries
University of Bristol
University of British Columbia Library
University of Buckingham
University of California
University of California Libraries
University of Chicago
University of Connecticut Libraries
University of Connecticut Libraries and Hartford Medical Society Historical Library
University of Connecticut Libraries and University of Pittsburgh
University of Edinburgh
University of Evansville Libraries
University of Florida
University of Georgia
University of Glasgow Library
University of Guelph
University of Guelph Library
University of Idaho
University of Illinois Urbana-Champaign
University of Illinois at Chicago
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