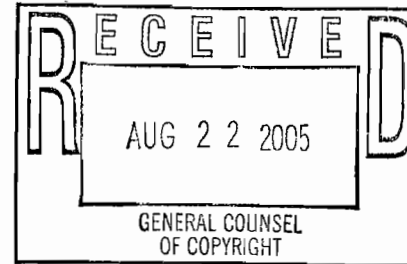


DOCKET NO.
RM 2005-9
COMMENT NO. 187

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Gentlemen:

At this Web address: <http://www.copyright.gov/fedreg/2005/70fr44876.html>
I read a proposed policy with title "Preregistration of Certain Unpublished Copyright Claims" which asks the public to inform you whether or not we would have any problem if we were required to use the Microsoft Internet Explorer browser for preregistering a work.

Below you can read my personal opinion and feedback on this issue.

At the outset I should point out that, though we are a Canadian company, much of our business is done in the States, and therefore we do have a definite interest in US copyright issues.

I use a number of operating systems, including Linux (which comes with Mozilla Firefox and Konqueror), and Windows. While Windows does come with Microsoft Internet Explorer, I have found its promiscuous loading of potentially harmful content to be an unacceptable risk and have removed it from most of my Windows systems inasmuch as I can. In addition, as IT manager for my company, I have been forced to implement a no-Internet-Explorer policy; I have found that using MSIE poses an unacceptable security risk for the company I work with.

The only "advantage" that MSIE has over other browsers is their use of a proprietary technology, ActiveX, which is unsupported by other browsers and is a security risk.

Working as I do in the computer / IT field (I am a developer), I know that it is possible to design a website accessible with any modern Web browser, by using Web standards such as XHTML and CSS, and - whenever interactivity is needed - ECMAScript and Java applets (which can run on most operating systems). In the worst case, it would be possible to provide functionality with browser plugins; most commercial ActiveX controls are also available as plugins that will work with Firefox, Konqueror, and other browsers.

Requiring users to use a particular Web browser causes disruption, especially for Apple Macintosh and GNU/Linux or BSD operating systems users, who often have no access to Microsoft Windows and may have never used Microsoft Internet Explorer (which only runs on Microsoft Windows) before. Additionally, I should point out that your target users, creative workers in the film and music industries, are far more likely to be users of Macintosh computers, and none of the internet browsers which you indicate that you plan to support will operate on the Macintosh.

Please consider the difficulties of non-Microsoft operating system users and try to provide a standards-oriented Web design, which would make their life much easier.

Additionally, I would like to suggest that computer software should also be a category which would be available for pre-registration, as per <http://www.copyright.gov/fedreg/2005/70fr42286.html> -- there are a very large number of pre-release and incomplete builds of software packages that are being distributed widely over the Internet, just as there are pre-release films as mentioned in that notice.

Thank you,

Charles Wangersky