

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERENCE INC. and CERENCE
OPERATING COMPANY,

Plaintiffs,

v.

MICROSOFT CORPORATION and
NUANCE COMMUNICATIONS, INC.,

Defendants.

No. 1:25-cv-00553-JCG

REGISTER OF COPYRIGHTS'S NOTICE OF FILING

On behalf of the Register of Copyrights (Register), undersigned counsel hereby files the attached Response of the Register of Copyrights to Request Pursuant to 17 U.S.C. § 411(b)(2), as directed by Court Order. See ECF 30.

Respectfully submitted,

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United States Attorney

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Dated: September 23, 2026

Attorneys for Register

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CERTIFICATE OF SERVICE

I, Jacob Laksin, hereby certify that, on September 23, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System. All parties are represented by registered CM/ECF users and will receive notice through the CM/ECF System.

/s/ Jacob Laksin
Jacob Laksin
Assistant United States Attorney

Dated: September 23, 2026

Attorney for Register

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**RESPONSE OF THE REGISTER OF COPYRIGHTS
TO REQUEST PURSUANT TO 17 U.S.C. § 411(b)(2)**

On June 22, 2026, pursuant to 17 U.S.C. § 411(b)(2), the Court requested advice from the Register of Copyrights (“Register”) on whether she would have refused registration of the computer program claimed in registration number TXu 2-482-827, titled “Cerence TTS” (the “Work”), had she known that the object code was published in 2019.¹

The Register hereby responds that, based on the legal standards and examining practices set forth below, had she known prior to registration that the object code was published in 2019, the U.S. Copyright Office (“Copyright Office” or “Office”) would have corresponded to confirm whether the object code published in 2019 was the same version of the program as the deposit copy submitted for registration in 2024. If the published object code and deposit copy embodied the same version, the Office would have asked the applicant to amend the application to provide the date and nation where this version was first published. If the applicant declined, the Office would have refused registration.

¹ Op. and Order at 9 (“Order”) (June 22, 2026), D.I. 30.

If this Court finds that the Work was published in object code form at any time before the 2024 registration application was submitted, and that the published object code embodied the same version of the program as the deposit copy, the Court must then determine whether the inaccurate publication information was included on the registration application “with knowledge that it was inaccurate.”² Under the Supreme Court’s decision in *Unicolors, Inc. v. H&M Hennes & Mauritz, L.P.*, an applicant’s lack of “actual, subjective awareness” of either fact or law can preclude a finding that the registration is invalid.³

To the extent the applicant now seeks to correct the publication information, the Office will accept a supplementary registration application, provided that the deposit copy embodies the version of the Work to which the publication date pertains.

BACKGROUND

I. Examination History

A review of the Office’s records reveals the following:

On April 22, 2025, the Office received an application to register the Work as a computer program. The application identified Cerence s.r.l and Cerence BV as the Work’s authors, acknowledged it was a work made for hire, and stated that Cerence Operating Company was the copyright claimant via transfer by written agreement. The application stated that the Work was completed in 2024 and that it was unpublished. The deposit copy submitted with the application comprised text files containing the first and last twenty-five pages of the program’s source code.⁴ The applicant excluded from the claim “computer program, Earlier versions of computer program text,” and identified a previously published version registered in 2002 under the number

² 17 U.S.C. § 411(b)(1)(A).

³ 595 U.S. 178, 185 (2022).

⁴ 37 C.F.R. § 202.20(c)(2)(vii)(A)(1).

TX 5-455-712. The applicant identified “computer program, Additional computer program text” as the new material included in the claim.

Based on the information provided in the application, the Office had no reason to question Plaintiffs’ representations and accepted them as true and accurate. The Office registered the claim on April 24, 2025, with an effective date of registration (“EDR”)⁵ of April 22, 2025, and assigned it registration number TXu 2-482-827 (the “Registration”).

II. The Court’s Request

Plaintiffs Cerence Inc. and Cerence Operating Company (collectively, “Plaintiffs” or “Cerence”) commenced this action on May 6, 2025. As the Office understands the dispute, Defendant Nuance Communications, Inc. (“Nuance”) deployed text-to-speech (“TTS”) and voice recognition technologies in various industries including automotive, retail, financial services, healthcare, and telecommunications.⁶ In 2018, Nuance separated its automotive business from its other sectors by creating Cerence, Inc.⁷ During this separation, Cerence, Inc. created Cerence OpCo and other related subsidiaries. Cerence OpCo owns copyrights in certain TTS technology, including the Work, and has granted Cerence, Inc. a non-exclusive sublicense to use the Work.⁸ On September 30, 2019, Nuance and Cerence, Inc. entered a five-year Original Equipment Manufacturer License and Distribution agreement (“OEM”) that allowed Nuance to continue to use and distribute the Work, in object form only.⁹ During the OEM, Defendant Microsoft Corporation (“Microsoft”) purchased Nuance.¹⁰ As the five-year term approached its

⁵ The EDR is the date the Office received a completed application, the correct deposit copy, and the proper filing fee. 17 U.S.C. § 410(d).

⁶ Order at 3.

⁷ *Id.*

⁸ *Id.*

⁹ Am. Compl. at 3–4 (Aug. 1, 2025), D.I. 21.

¹⁰ *Id.* at 6.

conclusion, the parties engaged in discussions to extend the license but did not formalize an additional agreement.¹¹ Plaintiffs allege that Defendants Microsoft and Nuance (collectively, “Defendants”) infringed their copyright in the Work by “continu[ing] to use the [Work] beyond the scope” of the licensing agreement.¹²

Defendants moved to dismiss Plaintiffs’ infringement claim on three independent grounds, including, as relevant here, that Cerence’s Registration for the Work is invalid.¹³ Specifically, Defendants argue that Cerence improperly represented the Work as unpublished when it had been distributed to third parties and incorporated into products sold to the public starting in 2019.¹⁴ Plaintiffs counter that the Registration “properly registered its copyright in the unpublished, proprietary version of the source code” because the “[s]oftware is distributed as object code (a publicly available end-product) leaving the source code inaccessible (and therefore ‘unpublished’).”¹⁵ Plaintiffs further argue that, even if their interpretation was erroneous, the inaccuracy “would not invalidate [the Registration] altogether, it would simply require Cerence to file a Supplementary Registration.”¹⁶

In its June 22, 2026 order, the Court referred the matter to the Register, seeking her advice on whether the alleged inaccuracy, if known, would have caused her to refuse the Registration. The Court asked the following:

Would the Register of Copyrights have refused Registration Number TXu 2-482-827 had it known that the object code was published in 2019?¹⁷

¹¹ *Id.* at 9–10.

¹² *Id.*

¹³ Defs.’ Opening Br. in Supp. of Mot. to Dismiss the First Am. Compl. at 7 (Sept. 26, 2025), D.I. 24.

¹⁴ *Id.*

¹⁵ Pls.’ Answering Br. in Opp’n to Defs.’ Mot. to Dismiss at 16–18 (Oct. 31, 2025), D.I. 26.

¹⁶ *Id.* at 17 n.5.

¹⁷ Order at 9.

On August 25, 2026, Plaintiffs filed a motion to clarify or defer the referral to the Register until after discovery, suggesting that any distribution of the Work should be considered a limited publication rather than a “‘general distribution’ or ‘disclosure to the public.’”¹⁸ Defendants filed an opposition to that motion on September 4, 2026.¹⁹ Plaintiffs’ motion remains pending as of the filing of this response.

The Office recognizes that the Court has not yet resolved Plaintiffs’ pending motion. Without expressing views on that motion or the factual disputes before the Court, the Register responds to the Court’s referral because, whenever inaccurate application information is alleged, section 411(b) calls upon the Register to advise the Court on whether she would have refused registration had she known of the alleged inaccuracy.²⁰ Because the Register’s response addresses that hypothetical question, it can be provided without awaiting the Court’s resolution of the pending motion. The Office is not resolving the issue of whether the object code was published in 2019; rather, the Register assumes that fact solely for purposes of responding to the referral. The Court may then consider the Register’s response in light of its subsequent factual findings.

ANALYSIS

I. Relevant Statutes, Regulations, and Agency Practice

An application for copyright registration must comply with the requirements of the Copyright Act set forth in 17 U.S.C. §§ 408(a), 408(d), 409, and 410. Regulations governing applications for registration are codified at 37 C.F.R. §§ 202.1 to 202.24. Further, the principles

¹⁸ Pls.’ Mot. to Clarify or Defer the Referral to the Register of Copyrights Until Post-Discovery at 3–4 (Aug. 25, 2026), D.I. 31.

¹⁹ Defs.’ Opp’n to Pls.’ Mot. to Clarify or Defer the Referral to the Register of Copyrights (Sept. 4, 2026), D.I. 32.

²⁰ 17 U.S.C. § 411(b)(2).

that govern how the Office examines registration applications are set out in the *Compendium of U.S. Copyright Office Practices, Third Edition* (the “*Compendium*”), an administrative manual that instructs agency staff regarding their statutory and regulatory duties and provides expert guidance to copyright applicants, practitioners, scholars, courts, and members of the general public regarding Office practices and related principles of law. The Office publishes revisions of the *Compendium* to provide additional guidance where necessary and to reflect changes in the law or Office practices, which are provided for public comment prior to finalization. Here, Plaintiffs filed the registration application in 2025. Therefore, the governing principles the Office would have applied at that time are set forth in the current edition of the *Compendium*.²¹

A. Publication

The statutory requirements for copyright registration dictate that, “if the work has been published,” an application for registration shall include “the date and nation of its first publication.”²² The Copyright Act defines “publication” as

[T]he distribution of copies or phonorecords of a work to the public by sale or other transfer of ownership, or by rental, lease, or lending. The offering to distribute copies or phonorecords to a group of persons for purposes of further distribution, public performance, or public display, constitutes publication.²³

This provision identifies two types of publication: distribution and offers to distribute. First, a distribution “occurs when one or more copies or phonorecords are distributed to a member of the public who is not subject to any express or implied restrictions concerning the disclosure of the content of that work.”²⁴ For example, “a program is considered published if

²¹ U.S. COPYRIGHT OFFICE, COMPENDIUM OF U.S. COPYRIGHT OFFICE PRACTICES (3d ed. 2021) (“COMPENDIUM (THIRD)”), <https://perma.cc/N9H9-UESM>.

²² 17 U.S.C. § 409(8).

²³ *Id.* § 101 (defining “publication”).

²⁴ COMPENDIUM (THIRD) § 1905.1.

there has been a general distribution of the program code, regardless of whether the copies are distributed by purchase or license.”²⁵ Similarly, “a program is considered published even if the copies contained object code rather than source code and even if the source code has not been disclosed to the public.”²⁶ On the contrary, “a work may be considered unpublished if, in addition to communicating a work to a definitely selected group and for a limited purpose, the copyright owner imposed any express or implied restrictions concerning the disclosure of the content of that work, such as placing a statement on the copies or phonorecords indicating that distribution of the work is limited or restricted in some way, such as ‘Confidential—these specifications are for internal office use only.’”²⁷ Likewise, “an unauthorized distribution of copies or phonorecords does not constitute publication.”²⁸

Second, “offering to distribute copies . . . to a group of persons for purposes of further distribution, public performance, or public display, constitutes publication,” provided that the offer is made by or with the authority of the copyright owner and copies of the work exist when the offer is made.²⁹ The offering of a work to a single person does not qualify as publication.³⁰ And offering a copy of a work to a group of persons is not enough: the offer must also be made with the purpose of further distributing that work, publicly performing that work, or publicly displaying that work.³¹

²⁵ *Id.* § 721.9(E).

²⁶ *Id.* (citing *Midway Mfg. Co. v. Strohon*, 564 F. Supp. 741, 751 (N.D. Ill. 1983) (“the object code is nothing other than a direct transformation of a computer program, composed . . . in source code”)); see also *Syntek Semiconductor Co. v. Microchip Tech. Inc.*, 307 F.3d 775, 779 (9th Cir. 2002).

²⁷ COMPENDIUM (THIRD) § 1905.1.

²⁸ *Id.* § 1902.

²⁹ 17 U.S.C. § 101 (defining “publication”); COMPENDIUM (THIRD) §§ 1906, 1906.3.

³⁰ 17 U.S.C. § 101 (defining “publication”); COMPENDIUM (THIRD) § 1906.1.

³¹ See *NBC Subsidiary (KCNC-TV), Inc. v. Broad. Info. Servs., Inc.*, 717 F. Supp. 1449, 1452 (D. Colo. 1988) (“The offering . . . must be made to ‘a group of persons *for the purposes of further*

When filing an application for a published work, the applicant must provide the month, day, and year that copies of that specific work were distributed for the first time or were first offered to a group of persons for further distribution, public performance, or public display.³² The applicant is obligated to determine whether a work is published or unpublished based on the United States copyright law’s publication definition and the existing facts when it submits the application.³³ If the date of creation or date of first publication is inconsistent with other dates within the application or deposit, the registration specialist may communicate with the applicant regarding the inconsistency.³⁴ If the applicant affirmatively states in the application that the work is unpublished, it will be registered as such, “unless the information provided elsewhere in the registration materials clearly suggest that publication has occurred.”³⁵ A registration specialist may contact the applicant if the information provided suggests that the work might have been published.³⁶

B. Registration of a Computer Program

The Copyright Act defines a “computer program” as “a set of statements or instructions to be used directly or indirectly in a computer in order to bring about a certain result.”³⁷ A computer program may be expressed in source code, which is written in a human-readable programming language, or object code, which represents the conversion of the program into

distribution, public performance, or public display’ . . . Congress would have shortened the definition . . . had it not intended to qualify the definition by requiring that the offering be made for one or more of the specific purposes provided.” (internal citation omitted)).

³² COMPENDIUM (THIRD) § 612.6(A).

³³ *Id.* § 612.3.

³⁴ *Id.* §§ 603.2(C), 721.9(D)–(E).

³⁵ *Id.* § 612.7(B).

³⁶ *Id.* §§ 612.7(B), 1904.3.

³⁷ 17 U.S.C. § 101 (defining “computer program”).

machine language.³⁸ The Office views source code and object code as two representations of the same computer program.³⁹

Although the Office considers these formats to be embodiments of the same program, a program may be revised over time to create different versions. As a result, a published object code version may not necessarily embody the same version of the program as source code revised at a later date. The Copyright Act provides that “where [a] work has been prepared in different versions, each version constitutes a separate work.”⁴⁰ The *Compendium* explains that “[a]s a general rule, a registration covers one individual work, and an applicant should prepare a separate application, filing fee, and deposit for each work that is submitted for registration.”⁴¹

While copyright law protects each version of a work, it may not be necessary to register each version with the Office; it depends on whether the versions are published or unpublished.⁴² If a work is unpublished, in most cases, the applicant may submit the most recent or the most complete version and that application will cover all the unpublished material included in the deposit, regardless of when it was created.⁴³ If, however, the unpublished work is a new, or

³⁸ COMPENDIUM (THIRD) §§ 721.3–4.

³⁹ *Id.* § 721.5.

⁴⁰ 17 U.S.C. § 101 (defining “created”).

⁴¹ *See* COMPENDIUM (THIRD) § 511. There are limited exceptions to this rule, including for registration of collective works, published works using the “unit of publication” option, and group registration for serials, newspapers, newsletters, contributions to periodicals, unpublished photographs, published photographs, databases, short online literary works, musical works published on the same album, and secure test items. *See* 37 C.F.R. §§ 202.3(b)(5), 202.4; COMPENDIUM (THIRD) §§ 511, 512.2.

⁴² COMPENDIUM (THIRD) § 512.

⁴³ *Id.* § 512.1.

derivative, version of a previously published work, the applicant should identify the previously published work in the application and exclude it from the claim.⁴⁴

The Office will register a derivative computer program, provided that it contains “new material that is sufficiently different from the preexisting work such that the program qualifies as an original work of authorship.”⁴⁵ This requirement is not satisfied by “[m]aking only a few minor changes or revisions to a preexisting work, or making changes or revisions of a rote nature that are predetermined by the functional considerations of the hardware.”⁴⁶ “[T]he Office will not register the functional aspects of a computer program, such as the program’s algorithm, formatting, functions, logic, system design, or the like.”⁴⁷

The *Compendium* illustrates this point with the following example: A software company seeks to register “version 3.0” of a computer program. Version 3.0 contains an appreciable amount of code that also appeared in versions 1.0 and 2.0 of the same program, both of which were previously distributed.⁴⁸ In this situation, version 3.0 is a derivative computer program, and an application to register version 3.0 “should be limited to the new material that appears in version 3.0, and any source code that appeared in versions 1.0 or 2.0 should be excluded from the claim.”⁴⁹

To register a computer program, an applicant must also submit “one copy of identifying portions of the program, reproduced in a form visually perceptible without the aid of a machine

⁴⁴ *Id.* § 721.8.

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.* § 721.7.

⁴⁸ *Id.* § 721.8.

⁴⁹ *Id.*

or device.”⁵⁰ Specifically, the *Compendium* directs applicants to submit “an identifying portion of the *source code* for the particular version of the program that the applicant intends to register.”⁵¹ The Office “considers source code to be the best representation of the copyrightable authorship in a computer program” and “generally discourages applicants from submitting object code, because it cannot be examined for copyrightable authorship.”⁵²

C. Supplementary Registration

The Office recognizes that there may be a need for a registrant to correct certain errors or provide additional information after it has issued a registration. It therefore permits registrants to file an application for a supplementary registration to correct certain errors or amplify the information provided in the original registration.⁵³ The availability of a supplementary registration to correct errors is limited. The *Compendium* provides that a supplementary registration can be used to correct “an error involving the date of publication.”⁵⁴ However, “if the work was published on or before the date that the claim was filed with the Office, and if the

⁵⁰ 37 C.F.R. § 202.20(c)(2)(vii); COMPENDIUM (THIRD) § 1509.1(F). The Office defines “identifying portions” as the first and last twenty-five pages of the source code for the version being registered if the computer program is over fifty pages, or the entire source code if the computer program is less than fifty pages. 37 C.F.R. § 202.20(c)(2)(vii)(A)(1). “In the case of revised versions of computer programs, . . . if the revisions do not occur in the first and last [twenty-five] pages, the deposit should consist of the page containing the copyright notice and any [fifty] pages of source code representative of the revised material.” *Id.*

⁵¹ COMPENDIUM (THIRD) 1509.1(F) (emphasis added).

⁵² *Id.*

⁵³ 17 U.S.C. § 408(d); 37 C.F.R. § 202.6; COMPENDIUM (THIRD) § 1802. The Office may decline to issue a supplementary registration when it is aware that there is actual or prospective litigation involving a registration (1) if the proposed change would be directly at issue in the litigation, and (2) if the proposed amendment may confuse or complicate the pending dispute. COMPENDIUM (THIRD) § 1802.9(G).

⁵⁴ COMPENDIUM (THIRD) § 1802.6(I). But note, this would only be permissible if the deposit that was submitted with the initial registration would satisfy the deposit requirements for a published work, meaning that the initial deposit reflects the specific version of the work that was first published on the date specified in the supplementary registration application. *See id.* § 1802.7(D).

applicant mistakenly claimed that the work was unpublished as of that date, the date of publication cannot be added to the registration record with a supplementary registration” unless “the deposit requirement for that type of work would be the same regardless of whether the work was published or unpublished, such as . . . computer programs, . . . or other types of works that may be registered with identifying material.”⁵⁵

If an application for supplementary registration is approved, the Office prepares a certificate that contains pertinent information from the supplementary registration application, creates a public record that identifies and describes the changes or revisions that have been made, and assigns a separate registration number and EDR⁵⁶ to the supplementary registration.⁵⁷ It does not cancel or replace the original registration or the public record of that registration, or change the information or EDR set forth therein. Instead, the original registration and the supplementary registration, including the EDRs for each, coexist in the public record because the “supplementary registration augments—but does not supersede—the information” submitted in the original registration.⁵⁸ This process enables a court to determine whether the changes in the supplementary registration should be deemed effective as of the original EDR, or the EDR for the supplementary registration, after considering:

- (i) whether the changes made by the supplementary registration are material, and (ii) whether those changes should or should not be

⁵⁵ *Id.* §§ 1802.7(C)–(D) (citing 37 C.F.R. § 202.6(d)(4)(ii)).

⁵⁶ The EDR for the supplementary registration “is the day on which an acceptable application and filing fee, which are later determined by the Register of Copyrights or by a court of competent jurisdiction to be acceptable for supplementary registration, have all been received in the Copyright Office.” *Id.* § 1802.12.

⁵⁷ *Id.* § 1802.10. The Office will also place a note in the public record for the supplementary registration that cross-references the registration number and the year of registration for the initial registration. *Id.* § 1802.11.

⁵⁸ *Id.* § 1802; *see* 17 U.S.C. § 408(d).

deemed effective as of the date that the [initial] registration was made or the date that the supplementary registration was made.⁵⁹

II. Register's Response to the Court's Question

Based on the foregoing statutory and regulatory standards, along with the Office's examining practices, the Register responds to the Court's question as follows:

Had the Register been aware, prior to registration, that "the object code was published in 2019," the Office would not have issued the Registration without first corresponding with the applicant.⁶⁰ As explained above, publication is "the distribution of copies or phonorecords of a work to the public by sale or other transfer of ownership, or by rental, lease, or lending."⁶¹

Accordingly, "a program is considered published if there has been a general distribution of the program code, regardless of whether the copies are distributed by purchase or license."⁶²

Because the object code is a representation of the computer program in machine language, "a program is considered published even if the copies contained object code rather than source code and even if the source code has not been disclosed to the public."⁶³ A program may, however, be revised over time to create different versions. The Office may register revised versions of previously published programs provided the new versions contain a sufficient amount of copyrightable authorship. When completing the registration application, the applicant is required to exclude any material that appeared in the previously published versions of the program.

Here, Defendants allege that the object code for the computer program at issue was published beginning in 2019, when it was distributed to third parties and incorporated into

⁵⁹ COMPENDIUM (THIRD) § 1802.12.

⁶⁰ Order at 9.

⁶¹ 17 U.S.C. § 101 (defining "publication").

⁶² COMPENDIUM (THIRD) § 721.9(E).

⁶³ *Id.*

products sold to the public. The application to register the Work, however, stated that the program was completed in 2024. Therefore, taking Defendants' allegations as true, the key question is whether the Work completed and submitted for registration in 2024 is the same version that was published in object code in 2019 or a later version that was revised after the 2019 publication.⁶⁴

If the applicants confirmed that the Work was a revised version of the program embodied in the 2019 object code, then the Office would have registered the claim as submitted. As explained above, to be registrable as a derivative computer program, the new or revised material must contain a sufficient amount of original expression that is different than the preexisting program, and the applicant should exclude any previously published material from the claim.⁶⁵ Here, the applicant excluded "computer program, Earlier versions of computer program text," and identified "computer program, Additional computer program text" as the new material included in the claim. Thus, provided the new material contained a sufficient amount of copyrightable authorship, the Office would have issued the Registration without amendment because the applicant's disclosures accounted for the preexisting material.⁶⁶

If, however, the applicants confirmed that the object code published in 2019 represented the same version of the program submitted for registration in 2024, then the Office would have corresponded with the applicant to obtain the date and nation where this version was first

⁶⁴ The Register does not assess the veracity of Defendants' allegations. Section 411(b)(2) asks the Register to advise the Court whether the alleged inaccurate information, "if known," would have caused the Register to refuse registration. 17 U.S.C. § 411(b)(2).

⁶⁵ COMPENDIUM (THIRD) § 721.8.

⁶⁶ This analysis assumes that the deposit copy contains the appropriate identifying material for the version of the Work revised in 2024. *See* 37 C.F.R. § 202.20(c)(2)(vii); COMPENDIUM (THIRD) § 1509.1(F).

published in 2019 and amend the application accordingly.⁶⁷ The Office would likewise have required this information if the Work had been published in object code at any other time before the application was submitted.

As noted above, a supplementary registration may be used to correct errors involving the date of publication.⁶⁸ Because the Work is a computer program that is registered with identifying material, the Office will accept a supplementary registration application filed by Plaintiffs to correct the publication information, provided that the deposit copy embodies the version of the Work to which the publication date pertains.

CONCLUSION

After reviewing the available facts in this action and application of the relevant law, regulations, and Office practices, the Register hereby advises the Court that the Office would have corresponded with the applicant to confirm whether the object code published in 2019 represented the same version of the program as the deposit copy submitted for registration in 2024. If the published object code and deposit copy embodied the same version, the Office would have asked the applicant to amend the application to provide the date and nation where this version was first published in 2019. If the applicant declined, the Office would have refused registration. The Office will accept a supplementary registration application to correct the publication information in the Registration as appropriate.

Dated: September 16, 2026


Shira Perlmutter
Register of Copyrights and Director of the
U.S. Copyright Office

⁶⁷ 17 U.S.C. § 409(8); COMPENDIUM (THIRD) §§ 612.6(A)–(B).

⁶⁸ 17 U.S.C. § 408(d); 37 C.F.R. § 202.6; COMPENDIUM (THIRD) § 1802.