

August 21, 2009

Office of the General Counsel
U.S. Copyright Office
Room LM-401
James Madison Building
101 Independence Avenue, SE
Washington, DC 20559

Via Hand Delivery

Re: Electronic Registration for Deposit Account Holders
Notice of Proposed Rulemaking
37 CFR Parts 201 and 202, Docket No. 20009-4

Dear Sir or Madam:

The American Society of Media Photographers (ASMP) submits the following comments on behalf of its members in connection with the above-referenced proposed rulemaking. Founded in 1944, ASMP's mission is to protect and promote the interests of professional photographers who make photographs primarily intended for publication. ASMP currently has approximately 7,000 members in the United States and approximately 40 other countries, and it is the largest and oldest organization of its kind in the world.

The Copyright Office has solicited comments regarding proposed amendments to its regulations that would require electronic filing of applications for registration that are paid for by deposit account. The related question of whether the deposit account system should be continued has also been raised.

ASMP supports and encourages all Copyright Office attempts to improve the speed, efficiency and economy of the registration system. It has encouraged its members to utilize the on-line electronic registration system ever since the Copyright Office first introduced it. It is apparent from the information provided by the Copyright Office in the notice of proposed rulemaking that prohibiting the use of the deposit account system for registration applications submitted in print form would substantially improve the speed,

efficiency and economy of processing applications. For that reason, ASMP supports the proposal.

The Copyright Office also asks the related question of whether there is a continuing need for a deposit account system at all. It is ASMP's view that, in light of the prevalence of other automated, on-line methods of payments, such as credit/debit cards, PayPal™, there is no apparent need for the Copyright Office to maintain its own account system, with the requisite administrative burdens and costs. However, that view is predicated on the assumption that other methods of electronic, on-line payment, such as those mentioned earlier in this paragraph, will be acceptable methods of payment of Copyright Office fees and will be available for use by the public in an efficient, user-friendly digital environment.

ASMP is happy to provide any other information that the Copyright Office might wish and gladly supports all efforts by the Copyright Office to improve its operations through the use of modern technology. Please let us know if we can be of any further information or assistance.

Respectfully yours,

VICTOR S. PERLMAN
Managing Director & General Counsel

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