

Robert J. Carr and Carrco International, Inc. support Static Control's request that three classes of products be exempted from the DMCA. These are:

1. Computer programs embedded in computer printers and toner cartridges that control the interoperation and function of the printer and toner cartridge.
2. Computer programs embedded in a machine or product and which cannot be copied during the ordinary operation or use of the machine.
3. Computer programs embedded in a machine or product connected thereto, but that do not otherwise control the performance, display or reproduction of copyrighted works that have an independent economic significance.

The exemption of these three classes of products will allow consumers to make real choices in terms of purchasing replacement cartridges for their laser or ink jet printers. On the one hand they could purchase (OEM) Original Equipment Manufacturers cartridges for their printers at a higher cost or on the other hand, they could choose to purchase repaired or remanufactured cartridges at considerable cost savings. If the exemptions are not granted then cartridges will no longer be able to be repaired or remanufactured causing consumers to spend more money and causing a very real and measurable negative impact on the environment.

Carrco, a small to medium sized remanufacturer employing 12 people, is engaged in the remanufacture and repair of laser printer cartridges. We offer our customers, who presently number over 3500 nationwide, a cost effective and environmentally sound alternative to purchasing only new or OEM cartridges.

We provide our customers savings of 30-50% compared to buying new cartridges.

Additionally, we prevent the waste of over 25 tons of plastics and other reusable or recyclable waste each year. To put this in perspective the number of cartridges we recycle each year if laid flat and stacked on top of each other would reach as high as 7500 feet or the equivalent of six - 10 story office buildings.

In summary, our industry provides cost effective and environmentally responsible alternatives to consumers, which would be eliminated if the requested exemptions are not granted.

Thank you for the opportunity to comment on the rules.

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