

**W Styler**

**Comment on Exemption to Prohibition on Circumvention of Copyright Protection Systems for Access Control Technologies - Class 3**

To whom it may concern:

As a smartphone and tablet user, academic and researcher, the ability to "jailbreak", root, or side-load applications onto my device is absolutely critical. Although for many users, the carefully controlled experience given by companies such as Apple or Motorola is sufficient for their uses, for me (and many other researchers like me), capabilities are needed beyond those which major companies care to support.

For instance, in my work in computer natural language processing, often, the applications ("apps") which must be installed are in very early beta testing, unsuitable for sale or release through official channels (like the Apple App Store or the Android Market), but still need somewhat wider distribution than the "official" solutions provide. In this case, the ability to side-load applications is absolutely critical to the development process of new tools, as it allows us to get a large, but controlled, number of users using our tools.

In addition, in many cases, the tightly controlled experiences offered by Apple devices (or non-rooted) Android devices do not provide us as researchers with enough power to fully leverage the device. For instance, the phone or tablet may need to connect to a secure hospital network for all traffic for a given application, which is not currently possible on stock handsets from Apple, Motorola or HTC. To circumvent these controls on the user, the phone must be "jailbroken", with "root" access obtained. This allows us to make the edits to system files necessary for these sorts of specialized applications to run, without requiring the intervention of the manufacturer (who would doubtless require the purchase of customized handsets at considerable cost).

Finally, as a human, I find that features of my Android handset which require "root" access, one of the use cases which would be made illegal if this exemption were to expire, are simply indispensable. Backup of Applications and operating systems, the loading of secondary software or ROMs, and even the blocking of the privileges of malicious software, all require root access to the device.

Were rooting made illegal, in order to maintain the quality of the software and research applications that we develop, and to keep the quality of my mobile experience on par, I would be forced to not only break the law, but to instruct my friend, colleagues and collaborators on how to do the same. Please, don't force our research underground or make criminals out of people doing technological research.

Thank you,

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