



J. Matthew Williams  
Partner  
(202) 355-7904 Phone  
(202) 355-7984 Fax  
mxw@msk.com

June 29, 2015

VIA E-MAIL ONLY (2015ADMAT@LOC.GOV)

Jacqueline C. Charlesworth  
General Counsel and Associate Register of  
Copyrights  
U.S. Copyright Office  
Library of Congress  
101 Independence Ave SE  
Washington, DC 20559-6000

**Re: Docket No. 2014-7, Exemptions to Prohibition Against Circumvention of Technological Protection Measures Protecting Copyrighted Works, Class 1**

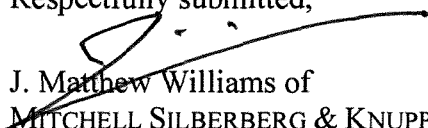
Dear Ms. Charlesworth:

On behalf of the Joint Creators and Copyright Owners, I am pleased to provide this response to your letter of June 3, 2015 regarding Proposed Class 1 – Audiovisual works – educational issues – colleges and universities.

The Joint Creators and Copyright Owners defer to DVD CCA and AACCS LA on the technical issues raised in your letter regarding screen capture technologies. However, we are not prepared to state whether any particular screen capture technology involves circumvention within the meaning of Section 1201, as we have not independently tested the technologies.

In addition, even if screen capture technology was incompatible with Apple computers, this fact would not be grounds for concluding that screen capture technology is not a viable alternative to circumvention. “In previous rulemakings, exemptions have been denied ... because although a user might have been prevented from engaging in a noninfringing use of a work using a particular device, the user could engage in the same noninfringing use of the work using a different device.” 2012 Recommendation at 220 (quoting 2006 Recommendation).

Respectfully submitted,

  
J. Matthew Williams of  
MITCHELL SILBERBERG & KNUPP LLP