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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 3**

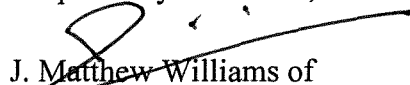
Dear Ms. Charlesworth:

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 3 – Audiovisual works – educational issues – massive open online courses (“MOOCs”).

The Joint Creators and Copyright Owners defer to DVD CCA and AACCS LA on the technical issues raised in your letter regarding how distance education platforms have implemented technological protection measures to protect copyrighted content. We also defer to DVD CCA and AACCS LA on whether distance education platforms are willing to implement such measures.

For the reasons stated in our written comments and during the hearing, we continue to oppose Proposed Class 3.

Respectfully submitted,


J. Matthew Williams of
MITCHELL SILBERBERG & KNUPP LLP