

In reference to your request for comments on "orphan works" and copyright, I am writing in support of revising copyright law in consideration of such.

I believe that copyright should not be implied on works older than 10 years and should be actively be maintained by the original author with an annual nominal fee after 20 years.

Computer software in particular presents many problems with the current standard of implied copyright, even on "orphan works". Preservation and use of older, unsupported computer hardware is very difficult when entangled by needless copyright on software that has no active copyright holder and no viable way to purchase license to use.

Archival of "orphaned" software is also endangered by the legal liabilities of doing so. It is important that interested libraries and archives are able to fulfill their missions when copyright holders are no longer present and/or interested in doing so.

Thank you for your careful consideration of the matter.

Pete Ashdown