

Rubinow-Daniel -20050225150002

To: Julie L. Sigall
Associate Register for Policy & International Affairs

Date: 02/25/2005

From: Daniel Rubinow

Comment:

Orphaned works need to be considered public domain. Congress should pass a law allowing such action if the true owner can not be found after making a reasonable attempt to locate. New users of otherwise orphaned works who are then found to be in violation need to be shielded.