

Davis-Bill-20050314083008

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

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From: Bill Davis
Title: VP
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Comment:

As a software developer who creates fonts (such as Arial, Times New Roman, etc.) my only concern with Orphan Works is how you define the difficulties people have with trying to find the copyright owner.

Almost all digital fonts in the common TrueType, PostScript and OpenType formats include the copyright string - a place where the copyright owner can place this information.

How difficult is it for a computer user to find the copyright information in a font? Not too difficult at all if you try to look for it.

But there may be other digital font formats, or derivative work formats that do not include the copyright information. Should the copyright owner be penalized for this?

I believe any changes you consider should provide flexibility to protect the copyright owner in environments where computer software makes ascertaining copyright information difficult.