MITCHELL SILBERBERG & KNUPP LLP

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

MS@K

Steven J. Metalitz A Professional Corporation (202) 355-7902 Phone (202) 355-7892 Fax met@msk.com

July 19, 2012

VIA EMAIL & U.S. MAIL

David O. Carson, Esq. General Counsel U.S. Copyright Office Library of Congress P.O. Box 70400 Washington, DC 20024 1201@loc.gov

Dear David:

On behalf of the Joint Creators and Copyright Owners, I am pleased to respond to Ben Golant's emails of July 12, 2012 and July 13, 2012 regarding Docket No. RM 2011-7, Exemptions to Prohibition on Circumvention of Technological Measures that Control Access to Copyrighted Works. Ben's emails invited the Joint Creators and Copyright Owners to comment on any new material raised in submissions on Proposal # 5, to the extent we had not had an opportunity to comment on such material previously. We appreciate your invitation. However, after reviewing the letters filed by the Electronic Frontier Foundation and New Media Rights (our understanding is that Mozilla did not file a letter in response to your prior letter of June 21, 2012), we have concluded that the proponents did not put forward any relevant facts or arguments that have not been previously addressed, and refuted, by our prior filings and testimony and the prior filings and testimony of the Business Software Alliance. We remain convinced that the proponents have not met their burden of persuasion.

Please let us know if you have any further questions.

Sincerely yours,

Steven J. Metalitz

cc:

Ben Golant Jesse Feder