



United States Internet Preservation Society

1750 Pennsylvania Ave NW #27009 • Washington, DC 20006

March 20, 2026

Rhea Efthimiadis
Assistant to the General Counsel
U.S. Copyright Office, Library of Congress
meft@copyright.gov

Re: Docket No. 2026-2: Copyright Office Fees (91 FR 13529)

Dear Ms. Efthimiadis:

The United States Internet Preservation Society (USIPS) writes in support of the proposed fee adjustments under Docket No. 2026-2. USIPS is a 501(c)(4) nonprofit organization dedicated to internet infrastructure preservation, copyright reform, and ensuring broad access to online services. We commend the Office for undertaking this overdue fee study and urge that, if anything, the proposed increases may not go far enough.

The Office's Cost Recovery Is Unsustainably Low

The decline from approximately 60% cost recovery to just 41% in fiscal year 2024 is alarming. The proposed fees would restore recovery to only 53% in the first year, a figure that will decline further as costs continue to rise. The resulting shortfall must be covered by Congressional appropriations, meaning American taxpayers subsidize the copyright registration system for the benefit of its users. While we recognize the statutory mandate to keep fees “fair and equitable,” fairness also demands that the system’s beneficiaries bear a reasonable share of its costs. We encourage the Office to set fees closer to the 60% historical benchmark rather than settling for 53%.

The Office May Be Underestimating Its IT Infrastructure Costs

We note that the FRD cost study projects year-over-year inflation at a conservative 3% through 2030. While this may be appropriate for general consumer prices, the Office’s costs are disproportionately driven by information technology: digital recordkeeping, the Enterprise Copyright System modernization, database maintenance, and cybersecurity. Technology-sector costs have risen well above the general CPI in recent years, and we believe this divergence will accelerate.



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The global explosion in AI adoption has placed enormous demand on the semiconductor, storage, and networking supply chains. The prices of server-grade hardware, enterprise storage, and data center services have increased significantly as AI workloads compete for the same components the Office relies on for its operations. Even organizations with no AI ambitions are paying more for compute and storage simply because the market has repriced these commodities upward. A 3% inflation projection for IT-dependent operations is optimistic at best, and the Office should consider whether a technology-specific cost adjustment is warranted.

The Cross-Subsidy Approach Is Sound and Should Be Extended

We strongly support the Office's approach of allocating greater cost recovery to services primarily used by corporate organizations while subsidizing individual creators. This is consistent with the copyright system's objective of encouraging creative production. We would encourage the Office to extend this principle more aggressively. The special handling surcharge for expedited registration, proposed at \$1,100 against a cost of only \$659, is one area where the Office has correctly set fees above cost. This surcharge is overwhelmingly used by well-resourced corporate litigants who need certificates for federal court proceedings, and for whom a higher fee is trivial relative to the cost of the litigation it supports. Similarly, group registrations for non-photographic and photographic databases, proposed at \$700 each, primarily serve corporate applicants and could absorb meaningfully higher fees. The revenue generated by these corporate-facing services could further offset the cost of registrations used by individual creators, such as the group registration options for photographers, which the Office has rightly kept at heavily subsidized levels. A broader and more aggressive application of this cross-subsidy model would allow the Office to maintain accessibility for individual creators while closing its cost recovery gap.

Higher Fees Serve the Objectives of the Copyright System

Beyond cost recovery, modestly higher fees serve the statutory objective of maintaining a robust and accurate copyright record. The Office's own data demonstrates that low-cost application options, such as the Single Application, attracted a disproportionate number of unqualified submissions, wasting both applicant and Office resources. We support the elimination of the Single Application for this reason. More generally, fees that reflect the true value of registration encourage applicants to submit carefully considered, well-prepared



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applications, improving the quality and reliability of the public copyright record.

We urge the Office to finalize these fee adjustments promptly and to consider whether additional upward adjustments are warranted given the accelerating costs of digital infrastructure. We appreciate the opportunity to comment.

Respectfully,

Joshua Moon

President and Treasurer

United States Internet Preservation Society

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