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

Date: 03/14/2005

From: Tim Allman
Title: President
Org: DA Services Corp.

Comment:

I have a small business that produces computer controlled test equipment. The typical life of these machines is in excess of 10 years. The machines are controlled by consumer grade personal computers running various software packages. The software was produced by our company using commercially available software tools and libraries.

Our problem is that when customers want to upgrade or replace computer equipment, we must often change the software to accommodate newer computers. When we try to do this, we have problems because the original libraries are no longer supported or available due to the disappearance of the manufacturer of the libraries.

We also cannot transfer ownership of source code in the libraries to our customers because we cannot locate the original copyright owners.

We and our customers have policies that require strict copyright maintenance. This has become impossible due to the common problem of disappearing copyright holders. A sunset law would go a long way to solving this problem.