

May 9, 2005

Julie L. Sigall  
Associate Registrar for Policy and International Affairs  
United States Copyright Office  
Copyright GC/I&R  
PO Box 70400  
Southwest Station  
Washington, D.C. 20024

Dear Ms. Sigall:

I am writing on behalf of the Museum of Fine Arts, Boston (MFA) in support of the proposal relating to orphan works (the "Orphan Works Proposal") presented by The J. Paul Getty Trust, the Solomon R. Guggenheim Foundation, and The Metropolitan Museum of Art, dated March 24, 2005.

Recognized for the quality and scope of its collections, the MFA holds over 400,000 objects of worldwide historic and cultural significance. The range of the MFA's activities include the organization of presentations, which vary in scale from major touring exhibitions to small scholarly colloquia, the display of works in the MFA's galleries, the creation of books, didactic programs, interactive displays and web content that educates and expands awareness and appreciation of the visual world. Increasing accessibility to its collections both nationally and internationally and engaging a wide variety of audiences are central to the MFA's mission.

Navigating copyright issues presents a unique challenge for the museum community as we seek to fulfill our educational objectives. Over the years, the MFA has formed its own guidelines, which strive to reconcile an informed legal analysis with the MFA's educational mission and its valued relationships with artists and rights holders.

We believe the Orphan Works Proposal mitigates a common problem for many museums in a way that both respects rights holders and supports organizations whose reproduction of orphan works is intended to serve the public. It promotes a level of consistency and provides relief from risk in ambiguous rights situations that might otherwise prevent a museum from sharing its important collection with the world.

Sincerely,

Debra LaKind  
Head of Digital Image Resources