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Introduction to Moving Image Archiving and Preservation

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The Future of Video Game Preservation (as told by U.S. Copyright)

The Digital Millennium Copyright Act (DMCA) was enacted in 1998 by the United States Congress which was to apply services from the World Intellectual Property Organization (WIPO) Copyright Treaty. With the DMCA, a new section to U.S. copyright (also known as title 17 of the United States Code) was created- Section 1201. Section 1201(a)(1) simply states that no one should “circumvent” technology which controls a work that is protected by copyright law.¹ In this case, “circumvent” means to alter some type of technology without the permission or authorization from the copyright owner. Triennial proceedings are unique events where the Librarian of Congress may adopt temporary exceptions to the Section 1201(a)(1) law. Users will not be infringing on copyright and would not face consequences as long as there is a specific exemption for that user.

This poses a dilemma with libraries, archives, and other cultural heritage institutions. When there is a need to preserve some technology, there may be some alterations that must be made in order to preserve the original technology or preserve its initial intention. For instance, preserving a web-based work of art would mean that institutions would need to get permission from the artist. Another example would be that video game publishers would have to grant libraries permission to have access to

¹ 17 U.S.C. § 1201(a)(1)

encrypted video game works in order to collect and save the original video game environment. In 2018, supporters of circumvention of video games filed a petition to expand a circumvention exemption to libraries, archives and museums so that these institutions could do further preservation of online and born-digital video games. Most of these supports came from institutions that archive video games in their collection. Around the end of 2018, the proceeding ruled in favor of these institutions, granting them the permission to circumvent, or alter, video games for the use of preservation.²

Introduction to Section 1201 of Copyright Law

In United States copyright law, there are specific rules that apply to the protection of copyright, including circumvention of copyright protection systems (Section 1201). For this paper, there will be emphasis on Section 1201. Section 1201(a)(1)(A) states,

“No person shall circumvent a technological measure that effectively controls access to a work protected under this title. The prohibition contained in the preceding sentence shall take effect at the end of the 2-year period beginning on the date of the enactment of this chapter.”³

To simplify, no one should alter a work that is under copyright protection. The law goes on further to describe a situation where non-profit libraries, archives, and educational institutions are exempt from what was written for Section 1201(a)(1)(A).

² U.S. Copyright Office. "Final Rule." <https://www.govinfo.gov/content/pkg/FR-2018-10-26/pdf/2018-23241.pdf>.

³ 17 U.S.C. § 1201(a)(1)(A)

Section 1201(d) explains that these non-profit institutions previously stated are not in violation of Section 1201(a)(1)(A). However, for it to not be in violation:

- The copyrighted work may not be retained longer than necessary
- The copyrighted work may not be used for any other purpose other than the sole purpose of “engaging in conduct permitted under the title”
- And the copyrighted work may not be used for commercial purposes ⁴

What this means for libraries, archives, and educational institutions is that as long as the purpose to alter copyrighted materials is not in violation or for commercial purposes, then it is possible to circumvent the “technological measure”. Libraries, archives, and educational institutions have the privilege of this exemption as long as they are open to the public, and to researchers outside of the institution’s researchers.⁵ Even though there is an exception for these institutions, the law does not allow flexibility which will cause future problems with educational institutions. Without the flexibility, it will be much more difficult to preserve a complex medium. The law does not say anything along the lines of what to do when the exempted institutions wanted to circumvent for the reason of preservation. This brings up the question- why circumvent if the technological work is not going to be preserved? One way libraries and archives preserve complex mediums is by changing servers of these technological measures.

Many archivists and librarians and their supporters go to the United States Copyright Office’s Triennial Proceedings to make a case on these nuances that are not

⁴ 17 U.S.C. § 1201(d)

⁵ 17 U.S.C. § 1201(d)(5)

directly discussed or written in Section 12 or in the DMCA. The reason for these triennial proceedings is to find a balance between copyright and digital technologies.⁶

Servers

For current multiplayer video games, they are played on servers. Servers are either hardware or software programs (running programs) that offer functionality to other programs (also known as clients). In regards to video games, the server is always a remote server. The client is the software that connects to the game server. There are two types of game servers: listen servers and dedicated servers. Listen servers are operated by individuals while dedicated servers are operated by the company that is the rightsholder of the video game. This becomes important when cultural heritage institutions are planning to preserve video games that rely on servers. These servers may be encrypted and archiving institutions such as libraries are unable to access the servers once they are no longer available.

Seventh Triennial Proceeding

The Copyright Office's Triennial Proceedings were initiated so that anyone or any company affected by the DMCA and/or Section 1201 laws can file petitions that will create (or not create) an exemption to the laws under Section 1201. The Librarian of Congress is the figure who would either grant or dismiss exemptions. The latest proceeding that finished with a final rule was the Seventh Triennial Proceeding. This

⁶ U.S. Copyright Office, "Section 1201 Rulemaking:Seventh Triennial Proceeding to Determine Exemptions to the Prohibition on Circumvention"
https://cdn.loc.gov/copyright/1201/2018/2018_Section_1201_Acting_Registers_Recommendation.pdf pg 1.

proceeding included twelve “proposed classes”, which are twelve proposed exemptions to the law stated in Section 1201(a)(1). These “classes” included:

- Audiovisual Works—Criticism and Comment
- Audiovisual Works—Accessibility
- Audiovisual Works—Space-shifting
- Audiovisual Works—HDCP/HDMI
- Computer Programs—Unlocking
- Computer Programs—Jailbreaking
- Computer Programs—Repair
- Computer Programs—Software Preservation
- Computer Programs – Video Game Preservation
- Computer Programs—Security Research
- Computer Programs—Avionics
- Computer Programs—3D Printing

The Seventh Triennial Proceeding was stated as significantly different from its founding. In the 1201 Rulemaking, it was said that many petitions were requesting to access copyright software contained in consumer products, such as software.⁷ For the purposes of this paper, there will be an extensive discussion on the proposal for video game preservation.

⁷ U.S. Copyright Office, “Section 1201 Rulemaking: Seventh Triennial Proceeding to Determine Exemptions to the Prohibition on Circumvention” https://cdn.loc.gov/copyright/1201/2018/2018_Section_1201_Acting_Registers_Recommendation.pdf pg 2.

Seventh Triennial Ruling Arguments: Video Games Requiring Server Communication—for Continued Individual Play and Preservation of Games by Libraries, Archives, and Museums

The Museum of Art and Digital Entertainment (MADE) filed an exemption petition during the seventh triennial process. The Museum of Art and Digital Entertainment's mission is to preserve "digital heritage in playable form, and to inspire the next generation of game developers".⁸ Within their petition, they asked for the circumvention of video games (specifically "online games") and also asked to broaden the class of users of this specific exemption. Currently, the class of users only goes as far as employees of libraries, archives, and museums. MADE wanted the class of users to include volunteer affiliate archivists (who would be under the supervision of an employee in a library, archive, or museum).⁹ MADE also proposed some changes to the exemption language.¹⁰ Consumers Union, FSF, Public Knowledge and forty-seven individuals supported the proposed exemption and proposed amendments from MADE.¹¹ However, Entertainment Software Association (ESA) and Joint Creators II opposed this exemption.

The Museum of Art and Digital Entertainment believes that the current exemption on video game preservation is "helpful", yet it does not acknowledge the preservation of

⁸ "The Museum of Art and Digital Entertainment.", <https://www.themade.org/>.

⁹ U.S. Copyright Office, "Section 1201 Rulemaking: Seventh Triennial Proceeding to Determine Exemptions to the Prohibition on Circumvention" https://cdn.loc.gov/copyright/1201/2018/2018_Section_1201_Acting_Registers_Recommendation.pdf, pg 256

¹⁰ Ibid. pg 256

¹¹ Ibid. pg 258.

the increasing number of online video games.¹² The museum goes on to say that cultural heritage institutions cannot preserve these online games or online gameplay without duplicating a game's server code or reconstructing the server.

In a YouTube video, Alex Handy from Museum of Art and Digital Entertainment explains to Cory Doctorow from Electronic Frontier Foundation about the issues he and others from MADE found when making the video game Habitat accessible and playable online. Alex states,

*"After working on this game, we sort of discovered you know there's some issues that we have to address if we want to continue to preserve virtual worlds and we also looked around and saw that nobody really is preserving virtual worlds in any institutional fashion."*¹³

It took about a year and a half for MADE to negotiate with AOL on the code for the obsolete service so that the museum could properly revive the 1985 MMORPG game. In the interview, Alex Handy then clarifies one possible reason why Entertainment Software Alliance was in opposition to the circumvention of video games. He explains that most people's understanding of preservation is putting something in a box and putting it in a room; however, when it comes to preserving software, preservation looks more complex.¹⁴

¹² U.S. Copyright Office, "Section 1201 Rulemaking: Seventh Triennial Proceeding to Determine Exemptions to the Prohibition on Circumvention" https://cdn.loc.gov/copyright/1201/2018/2018_Section_1201_Acting_Registers_Recommendation.pdf, pg 259.

¹³ *DMCA 1201 Hearings 2018: The MADE's Alex Handy Talks about how DMCA Impacts Video Game Preservation*. Directed by EFForg. 2018.

¹⁴ *DMCA 1201 Hearings 2018: The MADE's Alex Handy Talks about how DMCA Impacts Video Game Preservation*. Directed by EFForg. 2018.

The organizations that oppose this expansion of the exemption believe that the current way to preserve video games are “sufficient to address any legitimate preservation needs”.¹⁵ Other opponents of this exemption explained that the exemption was not solely for preservation, but for recreational purposes.

Final Ruling

In the Final Rule for Exemption to Prohibition on Circumvention of Copyright Protection Systems for Access Control Technologies, it states:

*Multiple organizations petitioned to renew the exemption for video games for which outside server support has been discontinued. The petitions stated that individuals still need the exemption to engage in continued play and libraries and museums continue to need the exemption to preserve and curate video games in playable form. In addition, the petitioners demonstrated personal knowledge and experience with regard to this exemption through past participation in the 1201 triennial rulemaking relating to access controls on video games and consoles, and/or representing major library associations with members that have relied on this exemption.*¹⁶

¹⁵ U.S. Copyright Office, “Section 1201 Rulemaking: Seventh Triennial Proceeding to Determine Exemptions to the Prohibition on Circumvention” https://cdn.loc.gov/copyright/1201/2018/2018_Section_1201_Acting_Registers_Recommendation.pdf, pg 262.

¹⁶ U.S. Copyright Office, “Final Rule.” <https://www.govinfo.gov/content/pkg/FR-2018-10-26/pdf/2018-23241.pdf>, pg 54014.

After listening to both the supporters' and opponents' views on preserving video game exemption, the Acting Register recommended an exemption for server-dependent games. The Acting Register also recommended an exemption for complete games but amended the language so that it included both server-dependent games and complete games. Server-dependent games were defined as "video games that can be played by users who lawfully possess both a copy of a game intended for a personal computer or video game console and a copy of the game's code that is stored or was previously stored on an external computer server."¹⁷ The adopted exemption's language is lengthy, but one could find the exact language in the "2018 Final Rule" file on the U.S. Copyright website.^{18 19}

Future endeavors to maintain this ruling

For this 2018 exemption and due to the current COVID-19 pandemic, the United States Copyright Office transferred this proposal of video game preservation to the Eighth Triennial Proceeding. No petition was needed for the proposal to be heard in this next proceeding. Anyone who so inclines would be able to make arguments and comments for or against the exemption through *Copyright.gov* website. Entities who supported and fought for this exemption before are possibly going to argue for the renewal of this exemption again. Because this particular exemption has been renewed before, there is a great chance that it will be renewed once again. However, even though a renewal is a win for cultural heritage institutions with video game collections,

¹⁷ Ibid. pg 54024.

¹⁸ Ibid. pg 54024-54025.

¹⁹ U.S. Copyright Office. "Rulemaking Proceedings Under Section 1201 of Title 17".
<https://www.copyright.gov/1201/>

the process of getting proposals renewed is very exhausting for the libraries and other institutions. For the future, exemptions that are granted during the triennial proceedings should be extended for a longer period of time or more favorably, should be permanent exemptions.

Arguments for the extension and maintenance of this ruling

The triennial proceedings are very consuming for cultural heritage institutions with work that is born digital or has been digitized. For those institutions who are collecting and preserving complex media or time-based media, it gets more complicated. There needs to be a reform within the triennial proceedings where the exemptions they grant last more than three years. Specifically with video game preservation, the exception should last without a fixed date. The exception can last until there is a significant change in video game function, such as video games are no longer in need of servers.

Many institutions who own a collection of discontinued video games are constantly in need of server support. Because these games are discontinued, many of the servers also do not run anymore. The collections then must be circumvented in order to be preserved in their original environment. In their petition for the Seventh Triennial Proceeding, the Library Copyright Alliance explained that “librarians will continue to need to engage in this circumvention in order to preserve video games in which server support has been discontinued.”²⁰ Electronic Frontier Foundation (EFF)

²⁰ Library Copyright Alliance and Jonathan Band. "Petition to Renew a Current Exemption Under 17 U.S.C. § 1201.", accessed October 1, 2020, <https://cdn.loc.gov/copyright/1201/2018/petitions-073117/Renewal%20Pet.%20-%20Abandoned%20Video%20Games%20-%20LCA.pdf>.

and University of Michigan Library Copyright Office also expressed the same concern with their 2017 petitions. EFF also added that without the exemption, video game publishers will continuously go after libraries and libraries will “face legal uncertainty”.²¹ What the petitions and hearings for the proceeding all have in common is this idea of ongoing or continuous circumvention in order to preserve video games. This was not the first proceeding where the video game preservation exemption was granted. It is possible that libraries and organizations like EFF will be in support of this exemption again for the Eighth Triennial Proceeding. This can be argued that this is further proof that the exemption for video game preservation should be extended for longer than 3 years.

It can be argued that this exemption should be a permanent exemption for libraries, museums, and archives. Video game publishers would counter this argument. The publishers would vocalize that if their discontinued video games were preserved, the games would be once again playable, which would cause them to lose out on a market where they could possibly reap financial benefits. Entertainment Software Association opposed this exemption and explained that this exemption is “non-transformative” and engages in exploitative copying.²² I believe if cultural heritage institutions are able to circumvent video games, it can help educate those who come to view and interact with the collection. Education of video games is more than just how to

²¹ Electronic Frontier Foundation. "Petition to Renew a Current Exemption Under 17 U.S.C. § 1201.", accessed October 1, 2020, <https://cdn.loc.gov/copyright/1201/2018/petitions-073117/Renewal%20Pet.%20-%20Abandoned%20Video%20Games%20-%20EFF.pdf>.

²² United States Copyright Office. "Section 1201 Rulemaking: Seventh Triennial Proceeding to Determine Exemptions to the Prohibition on Circumvention.", last modified Oct 2018, accessed October 1, 2020, https://cdn.loc.gov/copyright/1201/2018/2018_Section_1201_Acting_Registers_Recommendation.pdf#page=258&zoom=auto,-265,308.

play the game- it is also about how to understand the culture behind video games. The libraries' objective to circumvent video games is to give people the chance to learn from a non-traditional medium, not to join a market where they are competing with video game publishers for financial gain. The purpose of archiving and preserving is to make education free and accessible to all. In regards to ESA's perspective of this exemption creating "non-transformative" copies of published video games, one can argue that altering the server or emulating the game is a transformation of the game, thus making it possible to preserve without infringing on copyright. The overall argument cultural heritage institutions would give is that their use of the video games is fair use.

Copyright laws should change at the same rate as technology adapts and changes. Copyright law should handle the ongoing and growing issues with born-digital media by creating new laws or reforming current laws. In addition, copyright law should continue laws and exemptions that support the advancement of accessible education. One way to be current with today's technology is to give a permanent video game circumventing exemption to libraries, museums, and archives. Without a permanent exemption, cultural heritage institutions would be exhausting resources every three years for the permission to continue to preserve the history of video games. Institutions would also fall into legal uncertainty each time they endeavor to preserve history in a complex format such as video games.

What will the Eighth Triennial bring?

The Eighth Triennial hearing is currently in process. If a renewal or proposal is granted, it will be enforced from October 2021 to October 2024. As of October 15, 2020,

the United States Copyright Office started the proposed rulemaking; before the proposed rulemaking, the Copyright Office reviewed the petitions and comments that asked for renewal of the granted exemptions from the Seventh Triennial Proceeding.

When reviewing the renewal petitions, the Copyright Office did not see “any meaningful opposition to renewal” and stated that they intend to readopt all existing exemptions.²³ This intent may be influenced by pandemic, but it is possible that the Copyright Office may want to readopt for the reason that these exceptions are needed for cultural heritage institutions to continue their work either in circulation or preservation.

Supporters of Video Game Preservation

The video game preservation petition was renewed for the Eighth Triennial proceeding. The petition asks for an exemption for discontinued video games to have necessary jailbreaking so that they could be preserved in libraries, archives, and museums.²⁴

Software Preservation Network (SPN) and Library Copyright Alliance (LCA) joined together to write an additional petition for this year’s triennial proceeding. The Software Preservation Network main goal is to ensure that software is preserved via community engagement, knowledge, and infrastructure support.²⁵ The Library Copyright Alliance strives to ensure the fair use and access of information for libraries through the

²³ "Eighth Triennial Section 1201 Proceeding (2021).", <https://www.copyright.gov/1201/2021/>.

²⁴ "Petitions for Renewed Exemptions.", <https://www.copyright.gov/1201/2018/petitions-073117/>.

²⁵ "About-Software Preservation Network.", <https://www.softwarepreservationnetwork.org/about/>.

lens of copyright.²⁶ Together, the organizations wrote a petition for the Eighth Triennial proceeding. Their petition echoed the ruling of the seventh triennial proceeding ruling and supported the extension of the video game preservation ruling.²⁷

SPN and LCA are not the only organizations that are still in support of the extension of the video game preservation exemption. University of Michigan Library Copyright Office and Electronic Frontier Foundation have shown their support in the current and past triennial proceedings. Software Preservation Network has done an extensive amount of work in the software preservation field outside of the video game preservation. Their work includes defending the right to preserve any type of software, educating and training those on how to properly preserve software, and using best practices for metadata in software. Electronic Frontier Foundation has a similar mission to SPN, but on a broader scale. From the beginning, EFF has worked for “user privacy, free expression, and innovation through impact litigation, policy analysis, grassroots activism, and technology development”.²⁸ The organization has been involved in many triennial proceedings and lawsuits over the years related to anti-circumvention.

Interviews

Interviews were conducted with supporters and petitioners for the Eighth Triennial Hearing and Rulemaking. One goal for the interviews was to receive a better understanding of how involved copyright is when it comes to software preservation

²⁶ "Library Copyright Alliance.", <https://www.librarycopyrightalliance.org/>.

²⁷ "Petition to Renew a Current Exemption Under 17 USC § 1201." [www.copyright.gov](https://www.copyright.gov/1201/2021/petitions/renewal/Renewal%20Pet.%20-%20Abandoned%20Video%20Games%20-%20SPN%20&%20LCA.pdf), <https://www.copyright.gov/1201/2021/petitions/renewal/Renewal%20Pet.%20-%20Abandoned%20Video%20Games%20-%20SPN%20&%20LCA.pdf>.

²⁸ "Electronic Frontier Foundation.", <https://www.eff.org/about>.

(specifically video game preservation). Another goal was to ask supporters how they perceive the current video game preservation exemption and if the exemption needed alterations.

First Interview

The first interview was conducted with Jonathan Band, supporter and representative of the Library Copyright Alliance. He and LCA were one of the few petitioners who submitted a petition for the renewal of the video game preservation exemption. During the interview, Jonathan explained that the petition they submitted was for the U.S. Copyright Office to broaden the exemption. Band believes that the exemption accepted at the seventh triennial rulemaking was a start for video game preservation. Due to the pandemic, they and others realized that the preservation of and access to video games would need to be available outside of the premises of libraries, archives, and museums. The COVID-19 pandemic has shown that preservation cannot rely behind the doors of cultural heritage institutions. Band stated that in a pandemic or not, it would be nearly impossible for researchers to travel to institutions that preserve video games in order to further their research. He believes in order to make video games accessible for research and for preservation, the exemption needs to be open for preservation to happen outside the campus of cultural heritage institutions.

The petitioner is concerned that the U.S. Copyright Office would accept the petition, but restrict it to only crucial circumstances, such as another pandemic. They stated that when it comes to technological measures, the Copyright Office is conservative in their rulemaking and rarely makes exemptions for the circumvention of

technology. Although copyright law is not flexible when it comes to circumventing technological measures, the Copyright Office is slowly recognizing video games as culturally significant; Band agreed that this recognition is possibly due to a generational effect. They hope that the video game preservation exemption would not only be renewed, but also broaden its terms so that there is digital access to video games for research purposes.

Second Interview

An additional interview was conducted with Kendra Albert, the representative for Software Preservation Network for the Eighth Triennial hearing; Kendra Albert and SPN filed a renewal petition for expanding the video game preservation exemption. The overall message the interview had was that petitioners plus supporters for this exemption found the exemption not quite adequate for the preservation of video games. Kendra explained that they hope to see the exemption expanded in this current hearing.

Albert explained that one way the exemption could be broadened is that the exemption allows off the premises access. Due to the COVID-19 pandemic, it is now more important than ever to ensure that those who are preserving this complex media have remote access to them. It is also important for those researching the preserved vintage video games to have access. For instance, with the current exemption, a researcher would be unable to research a game unless the researcher traveled to the institution where the game is located. This is a limitation on anyone who wanted to conduct research on video games.

Another topic Albert discussed in the interview is that the U.S. Copyright Office and opponents of both video game preservation and software preservation have a different perspective on how preservation is implemented. As said before in Electronic Frontier Foundation's YouTube video interview with Alex Handy, the idea of preservation looking like white gloves and putting precious objects in a box and storing them for no one to see is not how preservation works when it comes to software preservation and video game preservation. There is also this elitist view where the U.S. Copyright Office recognizes the work from well-known institutions as legitimate preservation work, while the preservation work done by volunteers and emerging professionals is not recognized.

Conclusion

Without the renewal of exceptions, cultural heritage institutions would have to halt their preservation efforts. Their intent to readopt exemptions may also be influenced by the changing economic and social climate. How collecting and preserving is perceived is slightly changing. There is more emphasis on preserving those works and memories that are either short-lived or in danger of obsolescence. Video games tend to be short-lived, due to the fact that video game publishers do not keep the old servers. All that is left is a memory of that video game version. Cultural heritage institutions that have a video game collection are striving to keep those discontinued and abandoned video games. With the video game preservation exemption from the triennial proceedings, libraries, archives and museums are able to save not only the memories, but the game environment as well. There is a high chance that the Eighth Triennial proceeding will rule for the extension of the video game preservation exemption. As the

video game preservation exemption potentially evolves and expands, the perspective of preserving born-digital works will subsequently evolve as well. One element of copyright law is to ensure that education and knowledge is accessible to all. With many exemptions, including the video game preservation exemption, there is an emphasis on making information easily accessible for all. Without the extension to this particular exemption, it is possible many games, their environment, and their metadata will be lost to history. It is imperative to have exemptions and laws that are supporting the concept of free knowledge.

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