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BY EMAIL PDF

Mr. Gilles McDougall  
Secretary General  
Copyright Board  
56 Sparks St.  
Ottawa, Canada

Dear Mr. McDougall:

**Re: WORKING COMMITTEE ON THE OPERATIONS, PROCEDURES AND PROCESSES OF THE COPYRIGHT BOARD - REPKY**

You have asked for replies to the comments on the Copyright Board's recently published report of the WORKING COMMITTEE ON THE OPERATIONS, PROCEDURES AND PROCESSES OF THE COPYRIGHT BOARD (the "Report").

I believe that it is important to note that there was a surprising amount of agreement amongst a number of normally strange bedfellows (including Music Canada, Access Copyright, major broadcasters and myself) that the recommendations in the Report might actually make proceedings even longer and more expensive at the Board.

A number of submissions also noted and stated, in effect, that the any productive working group would need to have a membership that is broader than a small number of veteran and experienced Board lawyers. The status quo may be working very well for some of them and/or their clients. However, it is not working very well for many stakeholders or the general public.

Accordingly, if this consultation process is to be of any value, it is essential that it reflect a fresh and open approach that challenges certain long held assumptions and practices that are arguably, if not clearly, no longer tenable.

Yours sincerely,

***"HJK"***

Howard Knopf