

31 May 2011

Ms Helen Daniels
Assistant Secretary
Business Law Branch
Attorney General's Department
3-5 National Circuit
Barton ACT 2600

Dear Helen

Key Cultural Institution applications for declaration under the Copyright Act 1968

Thank you for your letter of 6 May 2011 and the opportunity to comment on the applications of the Australian Broadcasting Corporation, the Special Broadcasting Service and the Australian National University to be declared as 'key cultural institutions' for the purposes of sections 51B, 110BA and 112AA of the Copyright Act.

In principle, Screenrights supports 'key cultural institutions' ability to make preservation copies of films and sound recordings that are of historical or cultural significance to Australia provided they meet the commercial availability test set out in section 110BA (5) and the copies are made for valid preservation purposes.

Screenrights is satisfied that these institutions will comply with the provisions of the Copyright Act and they will rely on these sections solely for preservation purposes.

Please do not hesitate to contact me should you require any further information on any matters raised in this letter.

Thank you again for the opportunity to comment on these applications.

Yours sincerely



Simon Lake
Chief Executive Officer