January 19, 2009

Parallel Importation of Books Study
Attn: Ms. Jill Irvine
Productivity Commission
GPO Box 1428
Canberra City ACT 2601

Dear Ms. Irvine,

We write to you regarding the Productivity Commission’s study into copyright restrictions on the parallel importation of books. This study came to our attention in recent days, and it clearly is a matter of great interest for book publishers all over the world.

The Association of American Publishers is the national trade association of the U.S. book publishing industry. AAP’s approximately 300 members include most of the major commercial book publishers in the United States, as well as smaller and non-profit publishers, university presses and scholarly societies. Many of these publishers have a substantial presence in the Australian market and thus a considerable interest in copyright and regulatory issues affecting publishing companies based there. AAP, in turn, plays a leading role on behalf of the U.S.-based industry in monitoring intellectual property developments in key markets around the world.

With this letter, we simply wish to indicate our interest in the study and our potential participation at a future stage. We understand that you have received submissions from a number of our colleagues in the industry—both Australian and international publishers. We are monitoring these submissions and will assess the appropriateness of commenting on the draft report to be issued later this year.

As always, we thank you for the opportunity to comment and stand ready to assist the study in any way we can.

Sincerely,

Patricia L. Judd
Executive Director,
International Copyright Enforcement and Trade Policy
Association of American Publishers, Inc.