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May 8, 1997

Mr. Peter Fowler
Office of Legislative & International Affairs
United States Patent & Trademark Office
2121 Crystal Drive, CPK2, Suite 902
Arlington, Virginia 22202

Dear Mr. Fowler,

The Executive Board of the Art Libraries Society of North America approved the recommendation of our Public Policy Committee not to endorse the CONFU guidelines as proposed.

Please find enclosed a copy of the committee's report and the press release announcing the Executive Board's decision.

Sincerely yours,

A handwritten signature in cursive script that reads "Roger C. Lawson".

Roger C. Lawson
President
ARLIS NA

RCL:pdp

Encl

cc: Cameron Kitchen, AAM
Katherine Poole, ARLIS/NA Public Policy Co-Chair
Hinda Sklar, ARLIS/NA Public Policy Co-Chair
Gregg Most, ARLIS/NA Public Policy Committee
Penney De Pas, CAE, ARLIS/NA Executive Director



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FOR IMMEDIATE RELEASE

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**ARLIS/NA, Art Libraries Society of North America Votes Not to Endorse
Proposed CONFU Guidelines for Digital Image Archives**

San Antonio, TX -- April 14, 1997 --

At its meeting on April 3, 1997 the Executive Board of the Art Libraries Society of North America voted not to endorse the Conference on Fair Use (CONFU) Proposed Guidelines for Digital Image Archives.

ARLIS/NA has participated in the CONFU process since May 1996.

ARLIS/NA is keenly invested in and recognizes the potential benefits to accrue from the development of a set of reasoned guidelines. However, for such guidelines to be wholeheartedly embraced they must serve the needs of the Society constituency as a whole. The ARLIS/NA Public Policy Committee, chaired by Katherine Poole and Hinda Sklar, ultimately determined that this cannot be said of the present Guidelines. The Committee's deliberations included study of the Guidelines; a review of concerns and implications; a comparison of responses of other library and education professional organizations; and an acknowledgment of the complexities of the issues involved in the fair use of digital images and technology. ARLIS/NA members include practicing architecture and art librarians, visual resources professionals, artists, curators, educators, and publishers. Each constituency shares a common interest in the visual arts, architecture, and design, and in new methods and approaches to managing materials in these fields.

Therefore, after serious consideration, the Committee recommended to the Executive Board that ARLIS/NA not endorse the Proposal for Educational Fair Use for Digital Images, and the Executive Board approved this recommendation. The primary reasons for this decision are that it is premature and imprudent to endorse these guidelines given the current level of technology and understanding in the present highly fluid environment. Further, these guidelines would effectively limit or severely restrain the experimental and creative

MORE

NON-ENDORSEMENT OF CONFU GUIDELINES

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use of new technologies, including digital imagery, in teaching and educational pursuits.

As the current Conference on Fair Use (CONFU) process draws to a close, ARLIS/NA will prepare a formal report to Peter Fowler, CONFU Chair, prior to the final CONFU meeting planned for May 19, 1997.

During the present critical period of review and decision-making the Public Policy Committee will also review the Proposed CONFU Guidelines for Educational Multimedia and Distance Learning.

The Art Libraries Society of North America, founded in 1972, is devoted to fostering excellence in art librarianship and visual resources curatorship for the advancement of visual arts. For more information, contact the Art Libraries Society of North America, 4101 Lake Boone Trail, Suite 201, Raleigh, NC 27607-7506, 919/787-5181, fax 919/787-4916, email: 74517.3400@compuserve.com, Web site <http://www.uflib.ufl.edu/arlis>.

ARLIS/NA Public Policy Committee, *CONFU Report*

ARLIS/NA Public Policy Committee

Report & Recommendation

on

A Proposal for Educational Fair Use for Digital Images

March 18, 1997

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Introduction

After several years of concerted work by numerous participants and frequent contentious debate, the Conference on Fair Use (CONFU) will culminate in a final meeting May 19, 1997 at which time CONFU will consider adopting these proposed guidelines, taking into account the degree to which they have been endorsed by both the copyright owner and user communities.

This Committee report features a synopsis; a review of implications; a comparison of responses of other library and education professional organizations; and a recommendation for endorsement or rejection of the ***Proposal for Educational Fair Use for Digital Images***. Consideration of the mission and strategic plan of ARLIS/NA and membership input, including the final report of Gregory Most, the ARLIS/NA CONFU representative, and the Annual Report of the VRD, was integral to this process. The Committee respectfully submits this report to the ARLIS/NA Executive Board for review and to the membership at large.

Review of ARLIS/NA Involvement

Mary Levering of the U.S. Copyright Office contacted ARLIS/NA in 1996 as part of an effort to broaden representation to the Digital Images Working Group. ARLIS/NA's official participation dates from late May 1996 when Gregory P. J. Most, National Gallery of Art, began attending the working group sessions in Wash., DC. as the ARLIS/NA representative.

Review of Fair Use & Four Factors

Copyright Right Act of 1976, 17 U.S.C. ' 101 - Fair Use, Section 107

The most significant and, perhaps, murky of the limitations on a copyright owner's exclusive rights is the doctrine of fair use. Though now embodied in statutory language, the doctrine of fair use is rooted in more than 200 years of judicial decisions. Fair use is an affirmative defense to an action for copyright infringement. It is potentially available with respect to all manner of unauthorized uses of all types of works in all media. When the fair use doctrine applies to a specific use of a work, the person making fair use of the work does not need to seek permission from the copyright owner or to compensate the copyright owner for the use of the work.

Limitations on exclusive rights: Fair use

Notwithstanding the provisions of sections 106 and 106A, the fair use of a copyrighted work, including such use by reproduction in copies or phonorecords or by any other means specified in that section, for purposes such as criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research, is not an infringement of copyright. In determining whether the use made of a work in any particular case is a fair use the factors to be considered shall include --

- 1. the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes;
- 2. the nature of the copyrighted work;
- 3. the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and
- 4. the effect of the use upon the potential market for or value of the copyrighted work.

The fact that a work is unpublished shall not itself bar a finding of fair use if such finding is made upon consideration of all the above factors. 1

Summary of Digital Images Proposal (Draft, December 3, 1996) 2

The final draft of the **Proposal** addresses many complex and problematic issues concerning digital

images. As noted in **1.2 Background: Rights in Visual Images**, "Confusion regarding intellectual property rights in visual images arises from the many ways that images are created and the many sources that may be related to any particular image." [2] According to The December 1996 Interim Report, "The purpose of the Guidelines is to clarify the application of the fair use doctrine to the creation of digital archives, digital images and their use, for educational purposes, including the digitizing of pre-existing analog image collections and newly acquired analog visual images."³

Prefaced by the Fair Use preamble, the six sections of the proposal are based on *Section 1, The Introduction*, which lays out the applicability of the guidelines as applying "to the creation of digital images and their use for educational purposes" including pre-existing analog images collections and newly acquired analog visual images. Carefully devised working definitions cover *educational institutions; educators*, a *digital image*, a *thumbnail image* ("as used in a visual online catalog or image browsing display to enable visual identification of records in an educational institution's image collection, is a small scale, typically low resolution, digital reproduction which has no intrinsic commercial or reproductive value." [4]), an *analog image collection*, and a *visual online catalog*. *Pre-existing analog image collection* and *newly acquired analog visual image* definitions are both tied to the date of the adoption of the guidelines, originally noted as [December 31, 1996].

Conditions regarding the use of digital images are spelled out in Sections 2, 3 and 4 and cover a range of aspects of digitization by educational institutions, such as *Access, Display, and Distribution on an Institution's Secure Electronic Network; Course compilations of digital images; and Time Limitations for Use of Images Digitized by Institutions from Newly Acquired Analog Visual Images*.

Several significant conditions and processes concerning permissions for use of digital images are outlined in *Section 5*, e.g. "When digitizing copyrighted images, as permitted under these guidelines, an educational institution should simultaneously conduct the process of seeking permission to retain and use the images. Where the rightsholder is unknown, the institution should pursue, and is encouraged to keep records of, its reasonable inquiry." Sub-sections define *Reasonable Inquiry; Attribution and Acknowledgment; and Licenses and Contracts*. Limits and considerations include "the number and substantiality of the images that may be used from a single source," *Portions of Individual Images* (Section 5.6); and *Integrity of Images* (Section 5.7)

Section 6, Transition Period for Pre-Existing Analog Image Collections contains a plan for the proper implementation of digital image use in visual collections. Specifically, "Educational institutions may digitize images from pre-existing analog image collections during a reasonable transition period of 7 years (the approximate useful life of a slide) from [December 31, 1996]."

Review of Primary Concerns and Problematic Issues: Including the positions of ARLIS/NA alliances (ALA, CAA, IFLA, SAA and VRA)

1. It is premature and imprudent to endorse these guidelines at this time given the current level of technology and understanding in today's dynamic and highly fluid environment.

Several participants in the various working groups, including Digital Images, voice a fundamental objection to this digital CONFU process, namely that it is premature to develop fair use guidelines given the current level of technology and understanding. In fact, this issue repeatedly surfaced as a major and frequently significant objection in other CONFU working groups, ex. *Distance Learning Interlibrary Loan and Document Delivery*.

This view appears in several position statements such as this leading sentence from ALA, "In a time of rapid technological and policy evaluation, the American Library Association has concluded that it is premature to formalize guidelines for the fair use of copyrighted materials in a digital information environment."⁴ SAA also concurs, "It is the position of the SAA that until the network environment becomes more settled, it is better to follow the principles behind existing copyright law, and in particular the right of citizens to make fair use of material."⁵

2. The proposed curtailed Fair Use and other exceptions to proprietor rights is problematic for educational and research activities effectively limiting or severely restraining the experimental and creative use of new technology, including digital imagery, in teaching and educational pursuits.

Many librarians, art historians and educators have serious concerns with the fundamental thrust of these proposals. A strongly held position evidenced particularly in academic communities observed that the guidelines do not uphold the premise and practice of Fair Use.

The CAA observed that "The needs of the user community were not evenly balanced with the requirements of the rights holders. " and "Under the guise of fostering fair use, the guidelines actually set up an environment and rules that restrict and inhibit research and education. "⁶ Similarly, ALA notes that:

Fair Use and other exceptions to proprietor rights are a critical part of copyright law and are essential to implementation of the constitutional grant of limited copyright to advance science and the useful arts. While changes in the details of intellectual property policy are under active debate to adapt to new technologies, the broad principles that fair use and other exceptions represent in the interests of the advancement and spread of knowledge need acknowledgment and protection. Thus, it is premature to formalize fair use guidelines. Doing so may unduly restrain the proper application of fair use in the educational and research environments.⁷

IFLA's Position Paper on Copyright in the Electronic Environment of August 1996 states:

The benefits of new technologies should be available to all - the public, copyright holders and librarians. Information should be accessible regardless of format. Copyright stimulates intellectual activity and should not prevent access to information and ideas. Ideas residing in information in digital format should not only be available to those who can pay. Unless librarians and individual end users have clear rights, without prejudice to the legitimate interests of rights owners, this will create a greater divide between the information rich and the information poor.⁸

Specifically, in the *Proposal* permissions are necessary for **all** digital images, even thumbnails despite the fact that they are deemed to be " a small scale, typically low resolution, digital reproduction which has no intrinsic commercial or reproductive value."⁹

3. Unreasonable and unworkable responsibility for determining copyright ownership and permissions may impact negatively on education.

A major concern for visual collections is *Section 5* which delineates the responsibility for determining copyright ownership and permissions. The thrust of the Visual Resources Association (VRA) position

statement focuses on this significant point:

But what is most disturbing is that the CONFU Guidelines for Digital Images place the burden of clearing the rights to images entirely on the users. The methods described for clearing these rights are not just inconvenient, but completely unworkable. Also, none of the other guidelines presume to place a deadline on usage of materials or instruct the librarian (or visual resources professional) as to the procedures to be followed to obtain permissions. 10

The SAA agrees, especially noting the inappropriate onus of responsibility and the adverse effects on network applications:

Copyright owners, and not users, have the responsibility to enforce copyright. While all users should be respectful of copyright, it is primarily the responsibility of the copyright owner to investigate and prosecute violation of copyright. The use of network technology should make this search and discovery process easier, not harder. Nevertheless, the draft guidelines put the onus of protecting the rights of the copyright owners on the repository that wishes to distribute material via networks. It would have been much more useful if the guidelines had offered guidance on when it is appropriate to seek permission from the copyright owner, rather than insisting that educational institutions must always do so. 11

In concurring with this analysis the CAA also notes the likely impact upon the educational mission and the incongruencies with the intended goals of the NII, National Information Infrastructure:

Educators, librarians, and visual collection managers stated that the guidelines will not advance education because the procedures required for using digital images in an electronic environment do not simplify the task of making materials available to its constituents. They perceive the guidelines as working against education's most fundamental goals as well as some of those outlined for the NII in the "White Paper," namely (1) "to improve and enhance our lives" (p 8); (2) "to provide access to rich cultural resources around the world transforming and expanding the scope and reach of the arts and humanities" (ibid.); and (3) "to support our educational systems, by, for example, linking students and educators in remote locations around the world". 12

Considerable ramifications for education and research are foreseen by CAA and VRA as remarked upon by these groups, respectively:

The cost of complying with the guidelines may have the de facto effect of limiting access to digital imagery to the wealthiest institutions with the largest staffs. In this scenario the "haves" may participate, while the "have nots" are precluded from participating. 13

These guidelines could be very useful if the process for clearing the rights to surrogate images did not place such strains on the staffs and working budgets of visual resources curators. Unless visual librarians can digitize their collections under fair use without complicated and cumbersome restrictions, many digitization projects will more than likely be abandoned. One of the major purposes of these guidelines was to enable educators to use digital images in the classroom. It would indeed be a shame if the outcome of such guidelines had the opposite effect. 14

4. The Proposal proscribes new and varied restrictions on the use of digital images, e.g. time limitations; distribution on secure networks only, thereby redefining the Fair Use Four Factors.

There is further concern amongst several groups regarding the apparent undermining of Fair Use as evidenced by several new restrictions in the Proposal. The CAA observed that :

Although this draft at least recognizes the "nightmare" of sorting out multiple conflicting and questionable claims to copyright that will beset administrators of visual collections upon which teaching depends, the burden-shifting to the user of the image is "an impossible task," according to one respondent. There is no limit placed on the labor required to bring pre-existing collections of images that one wants to digitize into compliance. This is viewed as an unnecessary burden because a market cannot be robbed that does not exist. The guidelines put unnecessary limits on what is currently permitted as "fair use." For example, none of the four fair use factors puts time limits on use, but the guidelines do -- for determining if a use may continue without fee or permission. 15

Likewise the SAA finds that:

The proposed guidelines often needlessly inhibit, rather than enable, fair use of copyrighted material. There should be no automatic time limit on the fair use of copyrighted material. A use permitted under the fair use provisions of the copyright law may continue to be fair use, regardless of how many times or for how long it is used. 16

The SAA elaborates on the negative impact of the proposed limited distribution to a "secure campus network,"

Guidelines should not be limited to secure campus networks. The draft guidelines discuss the use of images on the institution's secure local network, including the delivery of thumbnail images. However since, as the guidelines note, thumbnails have "no intrinsic commercial or reproductive value," it should be possible to distribute these freely over an open network for educational or non-commercial purposes under existing fair use provisions of the copyright law. Furthermore, many governmental and private archives wish to make material available for research and scholarly use, and yet their user community may not be confined to an institutional local network, but may be found anywhere in the world. Provisions limiting display to a secure local network for these institutions are meaningless.

Even if substantial portions of an institution's archives were digitized, under the guidelines users would still have to travel to an institution to use the digitized materials on the institution's secure local network, defeating in a large part the rationale for digitizing. Moreover, certain potential users of unpublished archival and museum materials, such as schoolchildren, may not for security reasons be permitted access to the physical materials and hence need in-classroom digital access. Limiting access to institutional local networks would impede the development of collaborative (multi-institutional) digital information, research, and educational environments where materials might be collated in new ways, leading to the furtherance of knowledge development. 17

5. The proposal, as with previous guidelines, has the potential of appearing to be viewed and used as legal guidelines. Gregory Most noted, "There has been much debate about the role of the guidelines and whether they carry the force of law. From a legal standpoint it was pointed out the CONFU itself

has no authority for changing the educational guidelines of the 1976 Copyright Act." In fact, the first footnote of the Uniform Preamble for All Sets of Fair Use Guidelines states, "These Guidelines shall not be read to supersede other preexisting educational use guidelines that deal with the 1976 Copyright Act." 18 However, the appearance of and use to which guidelines are often put weighs heavily in viewing their role and in considering their adoption or endorsement. As SAA observed:

The guidelines may become the de facto definition of acceptable fair use. ... The draft guidelines neither help solve the very real management problems of archivists responsible for millions of visual images, nor do they facilitate the use of these images in education. 19

6. Due to the extent of overlap in issues regarding the use of digital images, it would seem that this Proposal should realistically be considered together with the other relevant CONFU Proposals, i.e. Fair Use Guidelines for Educational Multimedia and Educational Fair Use Proposals for Distance Learning.

Review of ARLIS/NA Membership, Partnerships and Values

In the process of developing the report and reaching a reasoned recommendation, we sought to appreciate the complexities of the issues and the complex nature of ARLIS/NA as a society. Membership data profiling ARLIS/NA reveals that, "Today, ARLIS/NA is a growing, dynamic organization promoting the interests of nearly 1,500 members." 20 Members include practicing architecture and art librarians, visual resources professionals, artists, curators, educators, and publishers all of whom share an interest in the visual arts, architecture, and design and in new methods and approaches to handling materials in these fields.

Obviously, devising guidelines which speak to the needs of such a diverse membership is an undeniable challenge. Likewise any notion of endorsement of guidelines should appreciate satisfying our entire constituency. The Society's partnerships with kindred professional organizations makes it natural to examine their positions on these and other relevant guidelines

ARLIS/NA actively seeks collaboration with other arts and information organizations to further the goals of art information professionals. Affiliated associations include the International Federation of Library Associations, the American Library Association, the Visual Resources Association, and the College Art Association. Additionally, ARLIS/NA is a member of the Society of American Archivists (SAA) and has been active in promoting international goals of art librarians through the Art Libraries Section of the International Federation of Library Associations and Institutions (IFLA)." 21

The ARLIS/NA mission statement and goals as embodied in the Strategic Plan were reviewed alongside the response of our members and affiliates.

Mission Statement: To foster excellence in art librarianship and visual resources curatorship for the advancement of the visual arts.

Strategic plan items affected:

GOAL 2. To Increase the Profession's Effectiveness in Managing a Constantly Changing Environment

- 2. Objective B. Facilitate current awareness and innovative uses of new technological

developments.

- 2. Objective C. Establish and promote the society's leadership in technological issues relative to visual arts documentation and digital imaging.

GOAL 3. To exert an influence on external forces affecting the profession through promotion, cooperation, and advocacy. 22

Review of ARLIS/NA Responses

Gregory P. J. Most, the ARLIS/NA representative to CONFU, expressed his recommendation as included in his **Final Report**:

It is my recommendation that the Art Libraries Society of North America withhold its endorsement of the proposed guidelines for digital images. This topic has sparked more ongoing discussion on ARLIS-L and VRA-L than any other topic recently. It is a highly emotional issue for academic institutions, most of whom depend on the principle of Fair Use to augment their image collections. The reality of this issue is that there is no easy answer and my recommendation seems to echo that of the majority of the Society. 23

Linda Bien and Martha Mahard, moderators of the **Visual Resources Division (VRD)** in their **memo of March 6, 1997**, "agreed to recommend that the ARLIS/NA Public Policy forward a recommendation to NOT endorse the proposed CONFU DI (Digital Images) guidelines." 24

The Public Policy Committee posted several messages to **ARLIS-L** throughout the year in order to solicit comments and reactions from ARLIS/NA members, particularly visual resources curators as those most likely to be directly affected by the guidelines. The level of response has been generally small, especially as compared with the ongoing discussion on VRA-L, the VRA listserve. However, some lively exchanges revealed the spectrum of divergent views. From this small sampling one might develop a very broad, general characterization. Those from academic institutions, who formed the majority of respondents, were usually troubled with or in opposition to the guidelines while those from museum communities typically voiced support for the **Proposal's** reforms.

Recommendation

Certainly ARLIS/NA is keenly invested in and recognizes the potential benefits to accrue from the development of guidelines. However, for such guidelines to be wholeheartedly embraced they should serve the needs of the society constituency as a whole. We believe that this cannot be said of the present **Proposal**. Therefore, after serious consideration, the Committee is recommending to the Executive Board that ARLIS/NA NOT ENDORSE the **Proposal for Educational Fair Use for Digital Images** for the significant and primary reasons that it is premature and imprudent to endorse these guidelines at this time given the current level of technology and understanding in today's dynamic and highly fluid environment. Further, these guidelines would effectively limit or severely restrain the experimental and creative use of new technology, including digital imagery, in teaching and educational pursuits.

Katherine K. Poole & Hinda F. Sklar
Co-Chairs, ARLIS/NA Public Policy Committee

Footnotes

1. Copyright Act of 1976, 17 U.S.C. 101, Fair Use, Section 107
2. A Proposal for Educational Fair Use for Digital Images
3. The Conference on Fair Use: An Interim Report to the Commissioner
4. American Library Association Position on Fair Use Guidelines in a Digital Information Environment, January 3, 1997
5. Response of the Society of American Archivists to the Draft Guidelines Developed by the Conference on Fair Use, November 12, 1996
6. Statement from the College Art Association Regarding the "Educational Fair Use Guidelines for Digital Images," (11/6/96 draft), November 25, 1996
7. American Library Association Position on Fair Use Guidelines in a Digital Information Environment, January 3, 1997
8. IFLA: Position paper on copyright in the electronic environment
9. A Proposal for Educational Fair Use for Digital Images
10. Position Statement on the CONFU Guidelines for Digital Images, Visual Resources Association, November 22, 1996
11. Response of the Society of American Archivists to the Draft Guidelines Developed by the Conference on Fair Use, November 12, 1996
12. Statement from the College Art Association Regarding the "Educational Fair Use Guidelines for Digital Images," (11/6/96 draft), November 25, 1996
13. Ibid.
14. Position Statement on the CONFU Guidelines for Digital Images, Visual Resources Association, November 22, 1996
15. Statement from the College Art Association Regarding the "Educational Fair Use Guidelines for Digital Images," (11/6/96 draft), November 25, 1996
16. Response of the Society of American Archivists to the Draft Guidelines Developed by the Conference on Fair Use, November 12, 1996
17. Ibid.
18. A Proposal for Educational Fair Use for Digital Images
19. Response of the Society of American Archivists to the Draft Guidelines Developed by the Conference on Fair Use, November 12, 1996
20. Art Libraries Society of North America
21. Ibid.
22. Art Libraries Society of North America
23. Final CONFU Report--ARLIS/NA CONFU Representative, Gregory P. J. Most
24. VRD Moderators' Recommendation

Appendices

- A. A Proposal for Educational Fair Use for Digital Images
- B. The Conference on Fair Use: An Interim Report to the Commissioner, December 1996
- C. Final CONFU Report--ARLIS/NA CONFU Representative, Gregory P. J. Most
- D. Visual Resources Division (VRD) Moderators' Position Statement
- E. ARLIS/NA Alliances' Position Statements

- **American Library Association, ALA**
 - **College Art Association, CAA**
 - **International Federation of Library and Institutions, IFLA**
 - **Society of American Archivists, SAA**
 - **Visual Resources Association, VRA**
-
- **F. Digital Images Working Group Participants: Responses**
 - **G. Electronic Resources on CONFU**

Latest updated 3/18/97 K. Poole