No. 10-545

In The
Supreme Court of the United States

LAWRENCE GOLAN et al.,

Petitioners,

v.

ERIC H. HOLDER, JR. et al.,

Respondents.

On Writ Of Certiorari To The United States Court Of Appeals For The Tenth Circuit

BRIEF OF *AMICUS CURIAE* PUBLIC KNOWLEDGE IN SUPPORT OF PETITIONER

SHERWIN SIY
GIGI B. SOHN
Counsel of Record
PUBLIC KNOWLEDGE
1818 N St. NW
Suite 410
Washington, DC 20036
(202) 861-0020
gbsohn@publicknowledge.org

Counsel for Amicus Curiae

COCKLE LAW BRIEF PRINTING CO. (800) 225-6964
OR CALL COLLECT (402) 342-2831

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INTEREST OF *AMICUS*[1]

Public Knowledge is a non-profit public interest organization devoted to protecting citizens' rights in the emerging digital culture. Public Knowledge seeks to guard the rights of consumers, innovators, and creators at all layers of our culture through legislative, administrative, grass-roots, and legal efforts, including regular participation in copyright and other intellectual property cases that threaten consumers, expression, and innovation.

In its advocacy in both domestic and international forums, Public Knowledge has observed a continuing trend of copyright policies being pressed by industry and interest groups simultaneously around the world. Policies negotiated into treaties and non-treaty international agreements by relatively small executive delegations and those who seek to influence them can already have an outsized effect upon legislative priorities. Should courts lower the standard by which they scrutinize legislation for unconstitutionality whenever a law is proffered as a potential international bargaining chip, then nearly any speech-restrictive or

[1] No counsel for a party authored this brief in whole or in part, and no such counsel made a monetary contribution intended to fund the preparation or submission of this brief. No person other than the *amicus curiae*, or its counsel, made a monetary contribution to its preparation or submission. Petitioner and Respondent have filed letters with the Court granting blanket consent for *amici*, and their letters of consent have been filed with the Office of the Clerk of this Court. Parties have been given at least 10 days notice of *amicus*'s intention to file.

otherwise constitutionally suspect law may be offered as advancing a government interest.

SUMMARY OF ARGUMENT

As a content-neutral restriction on speech, Section 514 of the Uruguay Round Agreements Act ("URAA") can only pass constitutional muster if it advances a substantial government interest and is narrowly tailored to advance that purpose without restricting more speech than is necessary. The statute fails to do this. Although the Tenth Circuit found a substantial government interest in the protection of U.S. artists in foreign countries, Section 514 only speculatively advances this goal, relying upon a possibility of other countries agreeing to reciprocate. Furthermore, allowing the Government to assert a substantial interest due to an expectation of a *quid pro quo* with a foreign government would allow completely unrelated measures to be styled as advancing the stated interest.

Nor can the Court find a substantial government interest in merely increasing a likelihood of a desired outcome. Applying intermediate scrutiny to such an "interest" renders scrutiny nearly meaningless. If a goal is set at an increase in probability, proving that alternatives provide those same odds becomes a nearly insuperable barrier.

If the Court upholds the reasoning and opinion of the Tenth Circuit, it risks drawing a roadmap by

which speech-restrictive laws may evade the proper level of scrutiny, either by wrapping the law's effects in an international agreement advancing a real government interest, or by allowing a vaguely-defined government interest to escape a proper level of scrutiny.

ARGUMENT

I. The Court Must Apply Intermediate Scrutiny to Section 514

A. Section 514 of the URAA Is a Content-Neutral Restriction on Speech

The Tenth Circuit recognized below, and the parties agreed, that Section 514 implicates the First Amendment and should be analyzed as a content-neutral restriction on speech. That copyright serves to restrict certain types of speech is not controversial. *Eldred v. Reno*, 239 F.3d 372, 376 (D.C. Cir. 2001) (citing *United Video, Inc. v. FCC*, 890 F.2d 1173, 1191 (D.C. Cir. 1989)) ("[T]here is some tension between the Constitution's copyright clause and the first amendment . . . "); *Suntrust Bank v. Houghton Mifflin Co.*, 268 F.3d 1257, 1263, 1263 n.12 (11th Cir. 2001) (noting that the Copyright Clause and the First Amendment are "intuitively in conflict," and "[w]hile the First Amendment disallows laws that abridge the freedom of speech, the Copyright Clause calls specifically for such a law."). In *Eldred v. Ashcroft* ("*Eldred*"), this Court also noted that the presence of

built-in accommodations for the First Amendment within copyright law, which militate against subjecting every piece of copyright legislation to "heightened scrutiny." *See Eldred v. Ashcroft*, 537 U.S. 186, 221 (2003). However, the presence of those safeguards does not mean that a law receives a free pass from constitutional scrutiny simply because it invokes copyright or resides in Title 17. *Eldred* held that the D.C. Circuit "spoke too broadly when it declared copyrights 'categorically immune from challenges under the First Amendment.'" *Id.*; *see also United States v. Stevens*, 130 S. Ct. 1577, 1585, 176 L. Ed. 2d 435, 445 (2010) ("The First Amendment's guarantee of free speech does not extend only to categories of speech that survive an ad hoc balancing of relative social costs and benefits.").

The mere presence of safeguards, however, should not by itself relegate an area of law to mere rational basis First Amendment scrutiny. The goals and dictates of the First Amendment affect the interpretations of those same safeguards, as well as their scope and use in practice. Both judicial interpretation and executive practice therefore alter exactly how much protection free speech receives within different legal structures. For instance, laws directed at curbing obscenity are subject to existing First Amendment-related safeguards such as the *Miller* test. *See Miller v. California*, 413 U.S. 15, 24 (1973). However, these safeguards do not preempt or supplant First Amendment scrutiny, but simply give additional guideposts as to how that scrutiny can be applied. *See Reno v.*

ACLU, 521 U.S. 844 (1997) (holding that even though the Communications Decency Act incorporated and was consistent with the *Miller* obscenity standards, the Act was unconstitutionally overbroad under an independent First Amendment analysis). By the same token, precedent outlining the current state of fair use and the idea/expression dichotomy – or indeed other limitations and exceptions to copyright – does not create an upper bound for the extent of the First Amendment within the realm of copyright law. The safeguards built into copyright law, like those in defamation and obscenity law, operate as guidelines for the application of the First Amendment, not as outer boundaries for the incarnation of the First Amendment within each legal discipline.

Moreover, the Court has recognized that heightened scrutiny is appropriate where Congress has altered the "traditional contours of copyright protection." *Golan v. Gonzales*, 501 F.3d 1179, 1188 (10th Cir. 2007); *Eldred*, 537 U.S. at 221. In removing works from the public domain and placing them back into copyright, Congress has altered those contours. *See Gonzales*, 501 F.3d at 1184.

B. Section 514 of the URAA Alters the Traditional Contours of Copyright

This Court has identified at least two bulwarks of the traditional contours of copyright in the idea/expression dichotomy and fair use. *See Harper & Row, Publishers, Inc. v. Nation Enters.*, 471 U.S. 539, 556-60 (1985), *cited in Eldred*, 537 U.S. at 219-21. In *Harper & Row*, the defendant magazine publisher proposed a new standard for evaluating fair use when First Amendment interests were at stake. Declining to adopt this standard, this Court instead relied upon existing fair use factors in accounting for the First Amendment within the scope of fair use. *Harper & Row*, 471 U.S. at 555-58.

In *Eldred*, this Court expanded on *Harper & Row* by indicating that the First Amendment protections built in to copyright were "generally adequate" in themselves, and thus could preclude heightened scrutiny for other copyright laws, not just interpretations of fair use. However, intermediate scrutiny is still appropriate when Congress has "altered the traditional contours of copyright protection." *Eldred*, 537 U.S. at 221; *Golan*, 501 F.3d at 1188.

Those traditional contours consist of more than simply the idea/expression and fair use doctrines; there are storied limitations to the metes and bounds of copyright protection, including the first sale doctrine, library exceptions, requirements for originality and creativity, and the exclusion of pure functionality from copyright. One of those key contours of copyright

is its grant "for limited times." U.S. Const. art. I, § 8, cl. 8; *Wheaton v. Peters*, 33 U.S. 591, 684 (1834). In *Eldred*, this Court declined to find that the Copyright Term Extension Act ("CTEA") altered the traditional contours of copyright when it extended then-existing copyright terms by a definite amount. *Eldred*, 537 U.S. at 221. The Court was unable to justify scrutinizing the CTEA under a standard that would render constitutionally suspect every past copyright term extension. *See id.* By contrast, the alteration of the Constitution's "limited times" requirement that is worked by Section 514 can easily be distinguished from past extensions, in that it pulls works out of the public domain and into the restrictions of copyright, and thereby removing any certainty that any given works in the public domain may remain there permanently. Under this model, the mere articulation of a government interest could pull the rug out from under a publisher of 19th century novels, a performer of 18th century chamber music, or an anthologizer of Elizabethan plays. A bright line therefore exists between the term extension of *Eldred* and the term retrocession of Section 514. Granting Congress the power to reinstate at will long-lapsed copyrights clearly shifts the known contours of the bargain between authors and the public that is embodied in copyright.

II. Section 514 Is Not Narrowly Tailored to the Goal of Protecting U.S. Artists Overseas

If Section 514 is to survive intermediate scrutiny, the Government must be able to show that it advances important government interests unrelated to the suppression of free speech and must be narrowly tailored so that it does not burden substantially more speech than necessary to further those interests. *Turner Broad. Sys., Inc. v. FCC* ("*Turner II*"), 520 U.S. 180, 189 (1997).

The Tenth Circuit ruled that the Government had a substantial interest in obtaining legal protections for American copyright holders' interests abroad, but erred in finding that Section 514 was narrowly tailored to advance this interest. The relationship between the statute's copyright retrocession and the protection of U.S. authors is speculative and conjectural, and is constructed in such a way that virtually any statute could, by laundering it through an international agreement, be argued as an important government interest. Furthermore, even in meeting the Government's stated interests, Section 514 burdens substantially more speech than necessary.

A. The Asserted Benefits of Section 514 for Domestic Authors Are Purely Conjectural

The substantial interest underlying a content-neutral regulation of speech must alleviate harms

that are "real, not merely conjectural, and that the regulation will in fact alleviate these harms in a direct and material way." *Turner Broad. Sys. v. FCC* ("*Turner I*"), 512 U.S. 622, 664 (1994) (citing *Edenfield v. Fane*, 507 U.S. 761, 770 (1993)). In claiming that Section 514 served the interest of protecting U.S. authors overseas, the Government has clearly engaged in conjecture.

The plain text of the statute itself does nothing directly to advance the interests of U.S. authors in those other countries. Instead, this goal is only supported at a degree of remove. U.S. authors will receive additional protection only if other countries grant them that protection. Instead, the implication raised by the Government is that Section 514 *might* induce other countries to grant this protection.

Both below and in the statute's debate prior to passage, the Government's interests in protecting domestic authors rely entirely upon foreign countries' willingness to take the URAA as part of a *quid pro quo* in exchange for additional protections for American authors. *See General Agreement on Tariffs and Trade (GATT), Intellectual Property Provisions: Joint Hearing on H.R. 4894 and S. 2368 Before the Subcomm. on Intellectual Property & Judicial Admin. of the H. Judiciary Comm. and the S. Subcomm. on Patents, Copyrights & Trademarks of the Senate Judiciary Comm.* [hereinafter *Joint Hearing*], 103d Cong. 253, 224 (1994) (Statement of Karp, Irwin, counsel, Committee for Literary Studies, New York, NY) ("[T]here is absolutely no guarantee that [negotiating

countries] are stupid enough to adopt the reliance-party provisions you are being asked to adopt."). While the protection of U.S.-based copyright holders can certainly be a substantial interest, the connection between that interest and Section 514 literally depends upon speculation and conjecture regarding the conduct of other sovereign nations. While the political branches have discretion to make judgments in areas of foreign relations (*Regan v. Wald*, 468 U.S. 222, 242 (1984)), this does not give them carte blanche to set up any given policy as a substantial government interest because of its hoped-for indirect effects on other countries' actions towards U.S. stakeholders. When a proposed regulation impacts constitutional concerns at a level requiring more than cursory scrutiny, there must be a definite, direct, and material relationship between the foreign government's protection of U.S. interests and the statute that faces constitutional scrutiny.

In this case, the Government has failed to show that the protections it desired for U.S. authors necessitated the extraordinary measures of Section 514. While the possibility of such an exchange being brokered was raised in the URAA's legislative history, it was discussed as a mere possibility. For example, a representative for the Motion Picture Association of America stated:

> In order for most United States works to gain protection in Russia and the other former Soviet republics, the former Eastern bloc countries, South Korea and elsewhere, the

> United States must extend copyright protection to older works that were created in those and other foreign countries. *If* the United States passes a law that protects previously produced foreign works, then *we would have every right to expect* those countries to pass laws to protect previously produced American works.

Joint Hearing at 253 (statement of Matt Gerson, Vice President for Congressional Affairs, Motion Picture Association of America, on behalf of Jack Valenti, President and Chief Executive Officer, Motion Picture Association of America (emphasis added)). The International Intellectual Property Alliance similarly viewed the possible results in prospective terms:

> With us taking a strong and principled stand here in this country, we can leverage retroactive protection abroad. . . . I think the chances of us obtaining good retroactive protection is quite strong if we have this tool behind us. If they fail to do so willingly, we can take them to the GATT.

Joint Hearing at 242 (statement of Eric H. Smith, Executive Director and General Counsel, International Intellectual Property Alliance).

For the most part, discussions of any *quid pro quo* assumed without reference to any existing agreements that such an exchange should be forthcoming, or that any increase in leverage or likelihood in future negotiations was sufficient as a government interest. Other commentators clearly felt differently.

Irwin Karp, counsel for the Committee for Literary Studies, emphasized that the legislation traded significant domestic protection for foreign works in exchange for only vague offers of reciprocation abroad:

> The sole purpose of the . . . restrictions . . . on reliance interests is this so-called mirror image theory which has been referred to. There is no doubt that we do well to grant retroactivity so that Thailand and other countries who are not giving us retroactivity will reciprocate, and they probably will.
>
> But, there is absolutely no guarantee that they are stupid enough to adopt the reliance-party provisions you are being asked to adopt. They have industries that are reliance parties who are making a lot of money legitimately using American motion pictures, American recordings, and American software. If the British scheme were adopted in their countries, they would continue to use them. These governments are as sophisticated in copyright as we are, and unless we engage in trade-tactic arm twisting, there is no way in the world that they would cut their own throats by adopting these provisions.

Joint Hearing at 224 (statement of Irwin Karp, Counsel, Committee for Literary Studies).

In fact, the most definite assurance that Section 514 would achieve any protection for U.S. authors was still far from certain. Commenters stated that Russia had indicated in previous negotiations that it

would not retroactively protect U.S.-based works without reciprocation:

> Under current law, for example, Russia has taken the position that it need not protect American works created before it accedes to Berne, citing the American interpretation of Berne as not requiring such retroactive protection. In the long run, American authors would be helped by improved international copyright relations generally, which would strengthen their enforceable rights abroad for both existing and future works.

Joint Hearing at 208 (statement of Shira Perlmutter, Professor, Catholic University School of Law). At the most, Russian negotiators were said to have stated that they would interpret retroactive provisions as the United States did. *Id.* at 291 (statement of Jason S. Berman, Chairman and Chief Executive Officer, Recording Industry Association of America). This does not necessarily mean that passing the URAA would be met with parallel agreements in other countries. *Joint Hearing* at 224 (Karp). *See also* 7 William F. Patry, *Patry on Copyright* § 24:1 (2011). If the government interest is being broadly defined as "protecting the interests of U.S. authors around the world," and not merely as "producing favorable interpretations for U.S. copyright holders in Russia," then even this suggestion of potential agreement does not rise above the speculative. While courts should give deference to the political branches in matters of foreign policy, that deference does not extend to waiving

scrutiny of the statute based upon conjectural international cooperation.

B. A Policy Cannot Be Elevated to the Level of a Substantial Government Interest Because Foreign Governments Condition Actual Substantial U.S. Interests on its Implementation

The lack of a direct connection between Section 514 and a substantial interest in protecting U.S. authors presents another problem. Should the Court accept such a formulation for substantial government interests, nearly any statute could be justified simply by laundering it through an international negotiation. Taken to an extreme, this system could justify a ban on advertising Colombian coffee as furthering the protection of American authors, if the Brazilian government agreed to provide additional protections for U.S. works in exchange for the advertising ban.

Nor is it unlikely that such unrelated issues would be raised in international agreements or trade negotiations. The World Trade Organization ("WTO") allows countries to retaliate against one another's trade barriers in economic sectors entirely unrelated to the original areas of dispute. Understanding on Rules and Procedures Governing the Settlement of Disputes art. 22, Apr. 15, 1994. Marrakesh Agreement Establishing the World Trade Organization, Annex 2, 1869 U.N.T.S. 401. Intellectual property protections have increasingly been a source of WTO

disputes or potential retaliatory actions. For instance, when Brazil filed a complaint with the WTO regarding U.S. cotton subsidies, it was granted leave to retaliate by suspending its concessions against U.S. intellectual property rights under the Agreement on Trade-Related Aspects of Intellectual Property Rights ("TRIPS Agreement"). *See* Decision by the Arbitrator, *United States – Subsidies on Upland Cotton*, WT/DS267/ARB/1 (Aug. 31, 2009); *see also* 7 *Patry on Copyright* § 24:1. Similarly, Antigua and Barbuda was granted leave to retaliate against the United States' online gambling restrictions by suspending its TRIPS concessions to the U.S. up to the cost of $21 million annually. Decision by the Arbitrator, *United States – Measures Affecting the Cross-Border Supply of Gambling and Betting Services*, WT/DS285/ARB (Dec. 21, 2007). The cross-sector nature of modern trade negotiations makes it very likely that copyright provisions important to the United States will be negotiated in exchange for U.S. concessions in unrelated areas. Those unrelated areas cannot suddenly be justified as substantial government interests simply because they lead to another country agreeing to protect American copyrights more. To return to the earlier example, the promotion of Brazilian coffee is not a substantial interest of the United States Government.

Allowing such interest-by-proxy reasoning can also disrupt the balance of competencies between the legislative and executive branches. Non-treaty trade negotiations like the Uruguay Round Agreements are

negotiated without the advice and consent of the Senate. *See* Memorandum to Ambassador Mickey Kantor, U.S. Trade Representative, Re: Whether the GATT Uruguay Round Must Be Ratified as a Treaty (July 29, 1994), supplemented, 18 U.S. Op. O.L.C. 232. One senior U.S. trade negotiator was quoted as saying that "probably 50 people were responsible for TRIPS." 7 *Patry on Copyright* § 24:1, *citing* Peter Drahos and John Braithwaite, *Information Feudalism: Who Owns the Knowledge Economy?* 10 (2002). In this way, a small number of executive officials can force upon Congress the dilemma of either accepting a body of legislative changes already negotiated or allowing the United States to suffer the consequences of failing to meet the terms of the negotiated agreement. In this way, Congress can be convinced of an interest in meeting obligations under agreements it had no hand in negotiating, with potential consequences detrimental to U.S. interests should it not comply.

The executive branch is not the only body that may take advantage of international forums to press the apparent inevitability of legislation supporting a particular objective. Many laws and policies have been advocated before Congress on the grounds that they would bring the United States into compliance or harmonization with some international consensus. Very often, though, the particular policy advocated for is present in foreign countries due to the lobbying of those very interests now lobbying Congress in the name of harmonization. Examples abound. Many

provisions of the Digital Millennium Copyright Act, like anti-circumvention provisions, were pressed upon Congress as necessary for compliance with the then-recently-negotiated WIPO treaties, when earlier attempts to implement them had failed. *See, e.g.*, Jessica Litman, *Digital Copyright: Protecting Intellectual Property on the Internet* 128 (2001). Copyright term extension in the United States was promoted as a means of harmonizing with European term lengths; now European legislators are being lobbied to extend sound recording terms to match the extended lengths of U.S. protection. *See, e.g.*, *Pre-1978 Distribution of Recordings Containing Musical Compositions; Copyright Term Extension; and Copyright per Program Licenses: Hearing Before the Subcommittee on Courts and Intellectual Property of the Committee on the Judiciary, House of Representatives*, 105th Cong. 5 (1997) (statement of Rep. Howard Coble, Chairman, H. Subcomm. on Courts and Intellectual Property); *also Eldred v. Ashcroft*, 537 U.S. 186 (2003); Eric Pfanner, *Europe Moves Toward Compromise on Copyright for Musicians*, N.Y. Times, Dec. 14, 2008, http://www.nytimes.com/2008/12/14/business/worldbusiness/14iht-copyright15.1.18652858.html.

Advocates have also made use of foreign agreements to engage in "policy laundering" in other arenas as well. The Council of Europe Cybercrime Treaty, for example, was drafted within the 43-member Council of Europe, with the United States and other nations as nominal "observers," though its provisions were largely drafted by advocates within

the United States who had met domestic resistance. Once the treaty was drafted elsewhere, it could be promoted as a means of harmonization, and not merely on the debated merits of specific proposals within it. *See* Barry Steinhardt, American Civil Liberties Union, "Problem of Policy Laundering" 2 (2004).

Claiming a substantial government interest in accommodating the negotiating objectives of a foreign country therefore runs a double risk of factions attempting to circumvent Congressional judgment. An administration eager to implement its particular policies over a reluctant Congress can write diplomatic checks that Congress must either cash or default upon. Nearly as easily, interest groups can invest in lobbying foreign legislatures, then approach Congress with a manufactured international consensus to justify similar policies here. In either case, this gaming of Congressional interest can effectively evade constitutional scrutiny only if the Court allows the Government to manufacture a link between any given regulation and a foreign party's promise of advancing an actual interest in return.

C. Section 514 Burdens More Speech than Is Necessary to Achieve its Goals

Petitioners and other *amici* have already argued several ways in which Section 514 burdens more speech than is necessary to achieve the goal of protecting U.S. authors. What bears emphasis here is

that if the Government's goal can be so broadly asserted as merely encouraging the protection of U.S. authors overseas, then an extraordinarily broad scope of alternatives can be produced – enough that the test itself becomes unworkable. If the Court is to actually address the merits of the asserted government interest, it must construe that interest with sufficient precision to actually measure the effects of the proposed provisions upon the goal.

III. An Increased Likelihood of Achieving a Government Interest Cannot Itself Be a Substantial Interest

A. Increasing Chances of Foreign Protection for U.S. Works Is a Purely Conjectural Goal

Though Section 514 is not narrowly tailored to advance the interests of U.S. copyright holders in other countries, the Government argues that the statute increases the chances that other countries might enhance protections for U.S. authors. While it may be possible to assert this increased likelihood as a substantial interest in itself, allowing such an ill-defined goal to serve as a substantial government interest would render constitutional scrutiny nearly meaningless.

The requirement of narrow tailoring is satisfied so long as the regulation promotes a substantial government interest that would be achieved less effectively absent the regulation. *Turner I*, 512 U.S.

at 662 (*quoting Ward v. Rock Against Racism*, 491 U.S. 781, 799 (1989)). If a substantial government interest can be defined as merely an increased *likelihood* of some positive result occurring, then it becomes trivial to construct the interest in such a way that any other measure than the one proposed would achieve a less effective result. If the sought-after result is concrete, it is possible to evaluate the comparative effectiveness of the proposed solution against equally or less speech-restricting alternatives, or conversely, to gauge the speech-restrictiveness of equally effective options. However, if the substantial government interest is taken to be simply a quantum of probability of achieving a potential result, then nearly any alternative measure that provided one iota less likelihood fails the test. *See Edenfield*, 507 U.S. at 770-71 (harms to be relieved by restriction must not be speculation or conjecture).

In this case, claiming that there is a substantial government interest in creating a higher likelihood of protection for American authors basically insulates Section 514 from any challenge as to its narrow tailoring. Proposals to follow the U.K. model for reliance interests, for example, could simply be claimed to be less *likely* to induce reciprocal protections by other countries, or less likely to generate any additional protections for U.S. authors. *Contra Joint Hearing* 224 (Karp). Providing a vague interest only serves to reduce to uselessness the standard of intermediate scrutiny.

B. Extending Compliance with International Instruments to an Indisputable Degree Is Not a Substantial Government Interest

Although the Tenth Circuit did not rule on these grounds, the Government also asserted that it had a substantial interest in attaining indisputable compliance with international treaties and multilateral agreements. For the same reason that a mere increased likelihood of achieving a speculative goal cannot by itself form a substantial government interest, achieving an increase in certainty against hostile foreign interpretation cannot form one either. Even before the passage of the URAA, the United States could have been said to comply with Article 18 of the Berne Convention, which broadly permits negotiated exceptions to retrocession requirements. Berne Conv. Art. 18(3). The mere fact that other countries might debate degrees of compliance does not automatically create a substantial government interest in passing accommodating legislation. The laws passed by Congress to implement international agreements must still be evaluated under the Constitution, and the compliance of those statutes with the Constitution must necessarily take precedence over their compliance with treaties and executive agreements.

CONCLUSION

The Tenth Circuit erred in finding that Section 514 of the URAA was narrowly tailored to serve a

substantial government interest. For the foregoing reasons, the Court should reverse the decision below.

Respectfully submitted,

SHERWIN SIY
GIGI B. SOHN
Counsel of Record
PUBLIC KNOWLEDGE
1818 N St. NW
Suite 410
Washington, DC 20036
(202) 861-0020
gbsohn@publicknowledge.org

Counsel for Amicus Curiae