

# Reprographic Right on Copyrighted Materials : In the Light of Fair Use

**Mintu Halder**

Librarian

Bhairab Ganguly College, Kolkata

mintu\_halder2007@yahoo.co.in

**Sovonjit Chatterjee**

MLIS Student

University of Calcutta

mailto:sovonjit@gmail.com

## Abstract

*This paper wants to explore how the pervasiveness of the photocopy machine and sub sequence advances in copying technology have generated a critical need for the establishment of systems that enables user to copy lawfully from copyrighted works. This article attempts to explore the historical roots of copyright law and provision of Fair dealing. It also attempts to analysis whether photocopy of copyrighted works for an educational purpose constitute Fair Use. The statutory provisions regarding copyright law and Fair Use in different countries have been enlisted. The analysis in this paper reflects, the possibilities that Fair dealing may have acted to inhibit technological innovation particularly in relation to the major characteristics of the emerging digital age when copying is easier, digitization occurs and market are enlarged. Finally a suggestion has been given in order to establish the reprographic right in educational institutions and in this regard the role of librarians. This article concludes to say that it is the time to shape the reprographic service so that they respect the rights of the copyrighted owner and meet the need of the users.*

**Key words:** Copyright Act, Fair Use, Fair Dealing, Library, Reprographic right

## Introduction

Reprography is a term that covers a wide range of operations. In the broadest sense, it can be defined as, "the reproduction and duplication of documents, written materials, drawings, designs, etc., by any process making use of light rays or photographic means, including offset printing, microfilming, photography, office duplicating ,and the like,"

However within the library world reprography is generally defined more narrowly. A useful definition for the current purpose is," reprography includes microcopy, photocopy duplicating and in-plant printing ,and it is in general characterized by the small scale of its operations and the non professional nature of its operatives.

## Need

No library, however big, can acquire all the materials required by its readers mainly due to financial limitations. For documents not available in its own stock, a library has to depend on other libraries. It is often easier and cheaper to procure a copy of the wanted document or the required portion of document from the library possessing such a document. Copies of these rare and out-of-print materials, which are not lent out, may also have to be supplied to the readers. Even when a document is available in a library for consultation, a reader may want its copy in order to save his time in noting down its contents. Thus, as Ashworth points out, reprography "brings to research workers materials which is, by its location or rarity. Not available to them in any more satisfactory form". Reprographic processes are also employed to prepare copies of important and rare documents in brittle condition or to preserve some documents in micro form to facilitate storage in a limited space.

## Use of reprography

Reprographic processes can be employed to the various types of jobs in libraries and documentation centers such as follows:

- To supply copies of articles from periodicals or relevant portions from other documents to the readers promptly.
- To prepare copies of documents for supplying on inter-library loan.
- To prepare copies of library bulletins or current awareness lists for distribution among the readers.
- To copy catalogue entries for making added entries or for supplying to other libraries.
- To copy and preserve rare and other important documents in brittle condition.
- To preserve periodical files in micro form.

## Advantages

The main advantages of using reprographic processes in libraries and documentation centres are:

- Copies of required documents can be supplied to the readers easily and quickly.
- Readers can be provided with copies of even such documents which cannot be allowed to be handled due to their rarity or bad physical condition.
- Rare documents and documents in brittle condition can be replaced without any difficulty.
- Binding's costs and storage space of periodicals volumes can be saved to a great extent by converting them into micro forms.
- The time required by the readers for copying their required documents or relevant portions of documents can be totally saved.
- The possibility of loss in transit or original documents sent on inter-library loan can be eliminated.

Thus "reprography facilitates the access to documents".

## Conflict between Copyright and Fair Use

Reprographic right and Copyright Act is the matter of debate between the author or creator and publisher on one side and the Education and Library community on the other. Both camps worked to influence the legislation.

### Right holder desk

When Photostatting was the only viable method of photocopying there was limited concern over potential copyright infringement, because the high cost of making a Photostat made large scale duplication economically unviable. However, as photocopying became more common in libraries after the introduction of the more modern copying methods, publishers began to concern that photocopies of copyrighted works were cutting into potential sales of those works and to call for stricter controls on photocopying. In the early 1960s the **Authors league of America** argued:

“Photocopy is not an extension of the library function. It is obviously a publishing function; it is publishing. Libraries manage to operate for many hundreds of years before the discovery of the camera; there is no reason why they cannot continue to function without photocopying. At least of copyrighted books. Nor is there any reason why any reader who does not wish to buy a book (or cannot find a copy available) should not do what readers have done throughout library history. Go to the library and read the book there.”

### Librarian desk

One of the prime benefits of a photo copying machine from a library or archives point of view is the ability to increase access and ensure reservation by making copies of works – the very action the copy right law is intended to control. In many countries Librarians and scholars attempted to justify the legality of making photo copies by arguing that the doctrine of “fair use” (in the United States) and “fair dealing” (in the United Kingdom and the other commonwealth Countries) allowed a certain amount of copy right materials to be photo copied for certain purposes. From the perspective of a librarians , photo copies of a portion of a book was no different than sitting down and copying out a passage that book by hand into ones notes. Which it was generally agreed, scholars were free to do.

## Challenges of Reprographic Right

### Legal aspects / copyright concern

Reprography is essentially copying of documents, the contents of which are the property of their respective authors or their nominees who hold the copyrights. In this respect the photocopier found their key question to be; is such copying permissionable under law? If yes, how much unsupervised copying is permissible in the library? What limitations are there in a library providing a photocopy or reprography service? What limitations are there in copying for replacement of lost or damaged materials? Are there any limitations on copying for inter library loan? To get an answer to this question we have to look into the provision of existing copyright laws.

### Copyright laws abroad

- According to British copyright law, an author's right is protected from the date of publication of work till 50 years after the death of the author.
- In USA the author or his nominee holds the rights for 28 years and the period may be extended for another 28 years.
- In USSR the copyright is held by the holder till 15 years after the author's death.

Each copyrighted works also bears the following warning "all right reserved. No part of this book may be reproduced or utilized in any form or by any means. Electronic or mechanical including xerography, photocopying, microfilming and recording or by any storage and retrieval system without permission in writing of the publisher".

### Law in India

According to Indian copyright law, the author or his assignee has exclusive rights to reproduce the authors work in any material form and he enjoys this right till 50 years after the author's death. Thus copying or reproducing of any documents without the prior permission of the copyright holder is considered to be an infringement of copyright law.

### Management of reprographic rights

In this context, to establish reprographic rights for the convenience of the users, another concept has been evolved- the concept of fair use or fair dealing, which allows use of works without the authorization of the owner of the right. It may however be noted that the aim of reprography is not to hamper the interest of the author but to promote proper use of their works.

### Concept of Fair use

Doctrine of fair use or fair dealing is an integral part of copyright law. It permits reproduction of the copyrighted work or use in a manner, which, but for the exception carved out would have amounted to infringement of copyright. It has thus, being kept out of the mischief of the copyright law.

The defense of fair dealing originated as an equitable doctrine allowing certain uses of literary works that copy right law would otherwise have prohibited, if prohibiting such uses" would stifle the very creativity which that law is designed to foster". Fair dealing also serves as an answer to those "Fair" copyright proponents, who actively argue that copy right, not being a patent, is not an absolute right and should therefore be balanced against user rights.

### Fair use abroad

- According to statutory provisions on the issue in **Australia** the inclusion of work in collection to be used by places of education shall not be regarded as acts constituting infringement of copyright in works
- In **Canada**, educational institution and persons acting under their authority make

copies and give performances or works for educational purposes, with restrictions where such works are commercially available. It is not an infringement of copyright to publish in a collection, mainly composed of non copyrighted matters, intended for the use of schools of short passages from public's literary works, not themselves published for the use of schools, if not more than two passages from works by the same authors are published by the same publishers within five years and the source from which passages are taken is acknowledged.

- In the USA, "notwithstanding the (protective) provisions of section 106 and 106A, the fair use of a copyrighted works including such use by reproduction in copies or phonorecords or by any other means specified in that section, for purposes such as criticism, comments, news reporting, teaching (including multiple copies for classroom use) scholarship, or research, is not an infringement of copyright."

### **Genesis of Indian fair use**

In India doctrine of fair dealing is statutorily entrenched under section 52 of the Indian copy right act, 1957. The English copy right act 1842 was held to be applicable in India by the Mumbai High Court in *Mc Millan –vs. - Khan Bahadur Shamsul Ulama Jaka*, even when the act was not made expressly applicable to India. In 1914 the Indian Legislature passed the copy right act 1940 so that thenceforth the law of copy right was governed by the imperial copy right act of 1911 which was essentially the extension of the British copy right act, 1911. The Indian Legislature; however had a very limited power of modification and addition. Fair dealing was first statutorily introduced in 1914 as a mere duplication of section 2 (1)(i) of the U K copyright Act,1911, providing that copyright would not be infringed by any fair dealing with any work for the purpose of private study , research , criticism , review or news paper summery.

### **The present statute and recent amendments**

The current Indian Copyright statute i.e., The Indian copyright act was passed in 1957 as an "Independent and a self contained law". Even the new legislation had extensively borrowed, both textually and in basic principle, from the new U K copyright act, 1956. However, the scope of fair dealing was increased in the statute of 1957. In the Indian copyright act, 1957, section 52 deals with fair uses. This section has only two sub sections. Section 52 (1) (g) and section 52(1) (h) dealing with fair use or fair dealing in an educational context. The section 52(1) (g) provides that the bonafide publication of non copy right matter in a collection intended for the use of educational institution is not amount to an infringement of copyright.

Section 52(1) (h) of the copy right act 1957, further provides that any reproduction of a literary, musical or artistic work by the teacher or pupil in the course of instruction or in answers to question asked in examination shall not amount to an infringement of copyright. These statutory provisions indicate that the law in India does not expressly deal with the issue of photo copying of copyrighted works for educational purposes.

Since 1957 , Section 52 which constitute fair dealings , has been amended thrice , the first minor amendments brought to section 52 was by the copy right amendment act,

1983( 23 of 1983) whereby an explanation below sub clause (ii) of clause (b) has been inserted. The section was however, comprehensively amended by the copyright amendment act, 1994. Activities like private research and dealing with computer programme and their copying by a law full processor were incorporated into the provision and making sound recordings of any literary , dramatic and musical works in certain circumstances were declared constitute fair dealing. The latest amendment brought to section 52 was in the year 1999, which again sought to address issues relating to computer programmes.

It may, however be noted that the aim of reprography is not to hamper the interest of the authors, but to promote proper use of their works. For this, reason, the Royal society of London called a conference of the British Publishers of learned publications in 1948 to sign a 'fair copy' declaration so that nonprofit making organizations, including libraries could make copies of articles from journals for the "genuine needs" of the scholars. Similarly, the joint committee of fair use in photo copying ( USA) has recommended that the making of a single copy by libraries is a direct and natural extension of traditional library services, while the committee of experts of the photographic reproduction of protected works meeting in Paris in 1968 has pleaded " to allow non profit making libraries to provide one copy free of copy right for each user provided that such copy in case of periodicals shall not be more that a single article and, in the case of a book not more than a reasonable proportion of the said book."

The Indian copy right law, for example, does not consider" making of not more than three copies of a book (including a pamphlet, sheet of music, map, chart or plan) by or under the direction of person in charge of a public library for the use of the library, if such book is not available for sale in India" and "the reproduction for the purpose of research or private study" as infringement of the law. The supplying of a copy of an article or a chapter of a book to a scholar or researcher is now usually allowed provided the recipient declares that it is needed for private study or research.

In the light of the above, many countries are now making provisions in their copy right loss to allow copying a limited way for 'fair use' by scholars and researchers.

### **Berne Convention**

Berne Convention in 1886 had the wisdom to get together to give tangible form to international copyright protection. In the article 9, 10 and 10b they have also gives some provisions of Fair use which discuss below.

#### **Article 9**

##### ***Right of Reproduction***

- ***Generally:*** *Authors of literary and artistic works protected by this Convention shall have the exclusive right of authorizing the reproduction of these works, in any manner or form.*
- ***Possible exceptions:*** *It shall be a matter for legislation in the countries of the Union to permit the reproduction of such works in certain special cases, provided*

that such reproduction does not conflict with a normal exploitation of the work and does not unreasonably prejudice the legitimate interests of the author.

- **Sound and visual recordings:** Any sound or visual recording shall be considered as a reproduction for the purposes of this Convention.

## Article 10

### *Certain Free Uses of Works*

- **Quotations:** It shall be permissible to make quotations from a work which has already been lawfully made available to the public, provided that their making is compatible with fair practice, and their extent does not exceed that justified by the purpose, including quotations from newspaper articles and periodicals in the form of press summaries.
- **Illustrations for teaching:** It shall be a matter for legislation in the countries of the Union, and for special agreements existing or to be concluded between them, to permit the utilization, to the extent justified by the purpose, of literary or artistic works by way of illustration in publications, broadcasts or sound or visual recordings for teaching, provided such utilization is compatible with fair practice.
- **Indication of source and author:** Where use is made of works in accordance with the preceding paragraphs of this Article, mention shall be made of the source and of the name of the author if it appears thereon.

## Article 10b

### *Further Possible Free Uses of Works:*

- **Of certain articles and broadcast works:** It shall be a matter for legislation in the countries of the Union to permit the reproduction by the press, the broadcasting or the communication to the public by wire of articles published in newspapers or periodicals on current economic, political or religious topics, and of broadcast works of the same character, in cases in which the reproduction, broadcasting or such communication thereof is not expressly reserved. Nevertheless, the source must always be clearly indicated; the legal consequences of a breach of this obligation shall be determined by the legislation of the country where protection is claimed.
- **Of works seen or heard in connection with current events:** It shall also be a matter for legislation in the countries of the Union to determine the conditions under which, for the purpose of reporting current events by means of photography, cinematography, broadcasting or communication to the public by wire, literary or artistic works seen or heard in the course of the event may, to the extent justified by the informatory purpose, be reproduced and made available to the public.

## Reprography in the Twenty-First Century

The traditional method of reprography-photocopying and micro-copying have lost some

ground to newer digital technologies in twenty-first century libraries. However both technologies are still widely used.

Micro filming continues to be a particularly important technology for preserving brittle books and serials. Although digitization is commonly used to enhance access to this type of fragile materials, digital scans are not considered to be adequate for long term preservation. Thus archives and research libraries with unique collections to do a great deal of micro filming to preserve intellectual contents of these collections. For example, in the U S , the members of the associations of research library alone micro field 154, 857 volumes and 11,686,507 single sheet in 2005-2006- a noticeable increase from the 109,526 volumes and 6,727, 348 single sheet that were micro films in 1996-1997. Photocopying, on the other hand has fallen of, as printouts from on line data bases have replaced photo copies as being generally the easiest way to get up personal copy of an article and as inter library loan has moved towards sending scans online rather than mailing photo copies. Some libraries have seen particularly step decline: for example, number of photo copies of journal articles made by England National Library for health declined by 52% between 2001and 2006-2007.

In the light of the above discussion, as printout from online databases have replaced photocopy, in the same way general copyright concern has been replaced by digital copyright concern. And how to use the Digital materials without violating the digital copyright law became a new challenge in front of librarian or information disseminator.

### **Digital Copyright**

- Digital copyright is simply the copyright protection of works in a digital environment. The legal issue of protecting one's intellectual property, i.e., the work has been continuously changed from access copyright (paper to paper use) to Digital Copyright.
- Instead of printed materials, digital copyright relates to anything in digitized form or machine readable form.
- In digital copyright the permission of a digitized work to be copyrighted is much more important than the copyright protected itself.

### **Digital Millennium Copyright Act (DMCA)**

The Digital Millennium Copyright Act (DMCA) is legislation enacted by the United States Congress in October 1998 that made major changes to the US Copyright Act. These changes were necessary in part to bring US copyright law into compliance with the World Intellectual Property Organization (WIPO) Copyright Treaty and the WIPO Performances Phonograms Treaty. The DMCA also strengthened the legal protection of intellectual property rights in the wake of emerging new information communication technologies, i.e., the Internet.

### **Exceptions**

Finally, the prohibitions contained in section 1201 are subject to a number of exceptions. One is an exception to the operation of the entire section, for law enforcement, intelligence and other governmental activities. (Section 1201(e)). The others relate to section 1201(a),



the provision dealing with the category of technological measures that control access to works. The broadest of these exceptions, section 1201(a) (1)(B)-(E), establishes an ongoing administrative rule-making proceeding to evaluate the impact of the prohibition against the act of circumventing such access-control measures. This conduct prohibition does not take effect for two years. Once it does, it is subject to an exception for users of a work which is in a particular class of works if they are or are likely to be adversely affected by virtue of the prohibition in making no infringing uses. The applicability of the exemption is determined through a periodic rulemaking by the Library of Congress, on the recommendation of the Register of Copyrights, who is to consult with the Assistant Secretary of Commerce for Communications and Information. The six additional exceptions are as follows :

- **Nonprofit library, archive and educational institution exception [section 1201(d)]**

The prohibition on the act of circumvention of access control measures is subject to an exception that permits nonprofit libraries, archives and educational institutions to circumvent solely for the purpose of making a good faith determination as to whether they wish to obtain authorized access to the work.

- **Reverse engineering [section 1201(f)]**

This exception permits circumvention, and the development of technological means for such circumvention, by a person who has lawfully obtained a right to use a copy of a computer program for the sole purpose of identifying and analyzing elements of the program necessary to achieve interoperability with other programs, to the extent that such acts are permitted under copyright law.

- **Encryption research [section 1201(g)]**

An exception for encryption research permits circumvention of access control measures, and the development of the technological means to do so, in order to identify flaws and vulnerabilities of encryption technologies.

- **Protection of minors [section 1201(h)]**

This exception allows a court applying the prohibition to a component or part to consider the necessity for its incorporation in technology that prevents access of minors to material on the Internet.

- **Personal privacy [section 1201(i)]**

This exception permits circumvention when the technological measure, or the work it protects, is capable of collecting or disseminating personally identifying information about the online activities of a natural person.

- **Security testing [section 1201(j)]**

This exception permits circumvention of access control measures, and the development of technological means for such circumvention, for the purpose of testing the security of a computer, computer system or computer network, with the authorization of its owner or operator.

### **Digitizing books is fair use**

To take over this challenge we have discussed two judgments of courts in respect the use of Digital materials.

#### **Author's guild -vs. - Hathitrust**

In a decision that is likely to help shape the future of online fair use, a federal court a New York has concluded that digitizing books in order to enhance research and to provide excess to print – disabled individual is lawful.

The case is the author guild incorporation vs. hathitrust, the lesser known but faster moving step sister to the author guild long running loss with against the Google for its Google book search service. For the first seven years. A major university library has been collaborating with Google to digitize the collections, with one result being the creation of the hathitrust digital library (HDL). Via the HDL more than sixty universities research library can store, secure and search their digital collections.

So, is that process a fair use, Hathitrust with support from EFF (electronic frontier foundation), numerous library association and prominent law professors, said yes, And the court agreed,. The judge noted that making copies to facilitate searching (and finding) information was a highly transformative use because “the copies served and entirely different purpose that the original works..... the purpose is superiors search capabilities rather than actual access of copyrighted materials.”

#### **Navada Court Rules Google cache is fair use**

Sanfransisco – of federal district court in navada has ruled that Google does not violate copyright law when its copies websites, store the copies and transmits them to internet users as part of its Google cache feature. The ruling clarifies the legal status of several common search engine practices and put influence future cases, including the laws with brought by book publishers against the Google library project. The electronic frontier foundations (EFF) was not involved in the case but applauds last week's ruling for clarifying that fair use covers new digital uses of copyrighted materials.

Blake field, an author and attorney brought the copyright infringement law suit against Google after the search engine automatically copied and cached a story be posted on its website. Google responded that its Google cache feature, which allows Google user to link an archival copy of websites index by Google, does not violate copyright law. The court agreed holdings that the cache qualifies of copyright materials.

“This ruling makes it clear that the Google cache is legal and clears away copyright question that have travelled the entire search engine industry.”

#### **Librarian's Role**

The work of reprography is a highly technical job requiring specialist training. Should a documentalist or a librarian providing documentation service be able to handle all the sophisticated reprographic instruments? Certainly not, and it is not required too. A reprographer is essentially a technician. A documentalist's is not a reprographer: he is not

expected to prepare a copy by himself. As Ranganathan says "if you become a technician of reprography, you cease to be a documentalist's you cannot find time or competence to do both the technician works and the documentalist one to full satisfaction." He is of the firm opinion that the work of reprography cannot be called a documentation work proper; it is only in the "fringe or our field of work" like translation. The role to be played by a librarian with regard to reprography, than, are, only the role of an organizer and the role of a middle man.

Although a librarian is not required to handle reprographic equipment himself, he must have a fair knowledge about the Legal aspects of Reprographic Rights for proper organization of a reprographic unit and maintenance of efficient service. And in this respect at the time of reprography the librarian must determine whether the use made of a work in any particular case is a fair use, the factors to be considered shall include-

- The purpose and characteristics of the use, including such use is of a commercial nature or is for nonprofit educational purposes.
- The nature of the copyrighted work.
- The amount and substantiality of the portion used in relation to the copyrighted work as a whole.
- The effect of the use upon the potential market for or value of the copyrighted work.

### Summary

Fair use explicitly allows of copyrighted materials for educational purposes such as criticism, comment, news reporting, teaching, scholarship, and research. Rather than listing exact limits of fair use, copyright law provides four standards for determination of the fair use exemption.

Before using all copying materials for educational purposes the following factors should be considered:

- Will the expression by the Author / creator be used? – will the particular way, words are sequenced or a concept is expressed, be used? If the answer is without a doubt "no", then the work may be used. The duplicating or photocopying someone else's work is the same as using the author's expression. If the answer to this question is "Yes" or "may be", the next question must be considered.
- Are the expression/ rendering protected by copyright? – If the answer is "No", then the work may be used. For example, a work might be old enough to be part of the public domain or perhaps unprotected for another reason. If the answer is "Yes" or "May be" the third question must be considered.
- Will the use go beyond the fair use? – If the application within one of the exception listed for fair use, then the material or work may be used. However, certain limitations still apply. If the answer to this all the above question is "Yes" then permission from the author is needed. If the answer to any of these questions is "no" the fair use provisions might apply. Still there is certain restriction.
  - ❖ Brevity – Numerical limits apply stipulating what extent or percentage of the whole work may be copied.

- ❖ Spontaneity – The idea to use the materials may not be pre conceived or pre planned. The administrators are prohibited from instigating fair use exemption for specific copyright materials for class room purposes. The time between the decision to use the materials and the occasion to use it in the class room must be so closed tighter that a timely request for permission from, the author could not be made.
- ❖ Cumulative effect- The copying must not have a negative cumulative on the market of the copyrighted work. The copying must be for (a) only one course in the school where copies are made; (b) not more than one short poem, article, story, essay or two parts from longer works copied from the same author; (c) nor more than three from the same anthology or collection or periodical volume during the one class term.
- ❖ Copy right notice- along with the attribution, this must be included on all copies.
- ❖ No photocopy profit- the student may not be charged more than the actual cost incurred in making the copies.

### Conclusion

Academic libraries have at their core the mission to serve the curricular and research needs of both the faculty and students of their institutions. Library reprographic service exists in a long tradition of ensuring the availability and accessibility of library reading materials to support the curriculum. With the introduction of new technology, reprography services have changed how their services are delivered. The new technology has shaped the direction of the service. These technologies have required libraries to confront the inherent copyright issues that they present. The pattern is clear: the technology is introduced, experimentation and adaptation of the technology occurs, uncertainty with regard to copy right is initially rampant, and copyright practice is normalized with the introduction of the photocopier this cycle took ten to fifteen years with digital scanning equipments the time span will be shortened. In the late 1990s libraries are still in a period of uncertainty as to how to observe copyright law in the electronic environment. In spite of and perhaps because of this uncertainty, it is also a time of opportunity: a time to reexamine longstanding assumptions: a type to shape the photographic services so that they respect the rights of the copyright owner and meet the need of the users. ●

### References

- <http://www.ipo.gov.uk/dce-report-phase2.pdf>
- <http://www.arl.org/info/frn/copy/dmca.html>
- <http://www.epic.org/privacy/drm/>
- <http://www.eff.org/IP/DRM/>
- <http://www.ipo.gov.uk/hargreaves-copyright-dce>
- <http://www.barrysookman.com/2009/11/12/%C2%A9-the-way-ahead-a-copyright-strategy-for-the-digital-age/>
- [http://www.wipo.int/treaties/en/ip/berne/trtdocs\\_wo001.html](http://www.wipo.int/treaties/en/ip/berne/trtdocs_wo001.html)
- <http://www.wipo.int>

[http://www.wipo.int/treaties/en/ShowResults.jsp?treaty\\_id=15](http://www.wipo.int/treaties/en/ShowResults.jsp?treaty_id=15)

- Darkey, Emmanuel Mensah & Akussah, Harry. (2008). Academic Libraries and Copyright Issues in Ghana: The University of Ghana in Focus. *International Journal of Legal information*, Vol.36, No.3, Winter pp.432-446
- James, T.C. (2004). Copyright Law of India and the Academic Community. *Journal of International Property Rights*, Vol.9, May, pp.207-225
- Singh, Dharam Veer & Kumar, Pankaj. (2005). Photocopying of copyrighted Works for Educational Purpose: Does it Constitute Fair Use? *Journal of Intellectual Property Right*, Vol 10, January pp 21-33.
- Kumar, P.S.G. (2004). *Information and Communication*, Vol.8, B.R. Publishing Corporation.
- Sharma, Ayush (2009). Indian Perspective of Fair Dealing under Copyright Law: Lex Lata or Lex Ferenda? *In Journal of Intellectual Property Right*, Vol. 14, November, Pp 523-531.
- Davies, J.E. (2003). *International Encyclopaedia of Information and Library science*, Routledge
- Reprographic Right Organizations, (1991). *Encyclopedia of Library and Information science*, vol. 48, Marcel Dekker Inc.: New York
- Reprographic Right Organizations. (1991). *Encyclopedia of Library and Information science*, vol. 66, Marcel Dekker Inc.: New York
- Encyclopedia of Library and information Science*, (2010). vol.6 , 3<sup>rd</sup> ed., CRC Press, Tailor and Francis Group