



December 6, 2023

Rhea Efthimiadis  
Assistant to the General Counsel  
U.S. Copyright Office  
101 Independence Ave SE  
Washington, DC 20540

**RE: Notice of Inquiry and Request for Comments on Artificial Intelligence and Copyright**  
**[Document ID: COLC-2023-006-0001] – Reply Comments**

Dear Ms. Efthimiadis:

Thank you for this additional opportunity to communicate our views on artificial intelligence (“AI”) and copyright and to help develop policy outcomes that will harness the benefits of AI while ensuring robust copyright protections.

Founded in 1807, Wiley is one of the world’s largest publishers and a global leader in research and learning. For more than 215 years, we’ve consistently operated within academic integrity principles, which has solidified our trusted status among academic institutions. This deep and diverse involvement with the academic community positions us as a dependable partner that can help navigate the complexities of integrating AI into research and learning. We are proud to support researchers and learners by providing them with the highest quality content and services, helping to improve outcomes and livelihoods and support national productivity and innovation.

As we noted in our Initial Comments, AI has an immense potential to strengthen our ability to deliver trusted, high- quality knowledge and knowledge solutions. AI can unlock significant productivity improvements by detecting plagiarism, extracting critical information, classifying and recommending content, conducting technical and language checks, and bringing together related information from disparate sources. At the same time, it can just as readily produce fake papers, falsify the peer review process, and erode the protection of intellectual property rights.

Given both the potential risks and rewards of AI, we would like to reiterate here our view that, in order to be truly effective, any policy framework aiming to address AI should:

- Respect existing intellectual property protections and require the use of licensing for copyrighted materials in the training of AI language models;
- Require transparency and accountability from AI tools to ensure their legal compliance, support accuracy, and reduce the potential for erroneous output;

- Include expanded national funding for AI research and development (R&D) that recognizes the cost of peer-review, editing, publication, distribution, and long-term stewardship of research; and
- Protect the integrity of research by incorporating defensive mechanisms that can identify fraudulent research accelerated by AI and produced under the guise of legitimacy by “paper-mills.”

Finally, we wish to endorse the Reply Comments submitted by the Association of American Publishers.

Once again, we look forward to working collaboratively with the U.S. Copyright Office and the wider scientific community on these critically important issues in order to strengthen research and innovation for the benefit of humanity.

Sincerely,

A handwritten signature in black ink, reading "Jessica A. Sebeok". The signature is written in a cursive, flowing style.

Jessica A. Sebeok  
Vice President for Global Government Partnerships and Public Policy  
Wiley