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**By Electronic Mail [FR0711@USTR.EOP.GOV](mailto:FR0711@USTR.EOP.GOV)**

Marideth J. Sandler

Executive Director of the GSP Program; Chair of the GSP Subcommittee

Office of the U.S. Trade Representative

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Re: GSP Country Practices Review, 004-CP-07,  
Lebanon, Follow-up to the 2007 Annual  
Review Country Practices Hearing

To the GSP Subcommittee:

The International Intellectual Property Alliance (IIPA) appreciates the opportunity to respond to questions asked at the Generalized System of Preferences (GSP) Public Hearing regarding “Case # 004-CP-07 (IPR- Lebanon)” as well as follow-up questions provided by the GSP Subcommittee of the Trade Policy Staff Committee.

**Questions that were asked during the hearing:**

1. You mention a recent meeting with the Lebanese Telecommunications Regulatory Authority to discuss approaches to effectively addressing cable piracy in Lebanon. Are any of IIPA’s members providing technical assistance to Lebanon in this area, or have plans to do so?

**IIPA Response:** Regarding technical assistance in general, at various points over the past couple of years, IIPA member associations, including the Motion Picture Association, Business Software Alliance and the International Federation of Phonographic Industries, have provided trainings to regulators and enforcement officials in Lebanon, while the Association of American Publishers has also been actively engaged.<sup>1</sup> They are in continuous contact with the Ministry of

<sup>1</sup> The following is an excerpt regarding training initiatives in Lebanon in 2005-2006, drawn from our 2007 Special 301 report:

The copyright industries provided various trainings once again in 2006. Training has focused on the new Special IPR Unit both in late 2005 and in 2006. In November 2006, the Head of the Special IPR Unit spent a day at UK FACT in London during which he learned the methods used by pirates and the means to investigate them. The record industry also conducted a special “Product Identification” training for 15 staff



Economy and Trade, the Ministry of Telecommunications, the Special IPR Cybercrime Unit, and the Telecommunications Regulatory Authority through local representatives. Specific initiatives have included the following:

- IIPA members assisted the Ministry of Telecommunications with draft legislation aimed at regulating Lebanon's cable industry, although, unfortunately, that legislation has not moved toward passage.
- IIPA members assisted the U.S. expert retained by USAID to draft cable legislation for Lebanon.
- IIPA members have provided copyright law training to the Special IPR Cybercrime Unit.
- There have been several training seminars by industry for inspectors of the Ministry of Economy and Trade.

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2. Your pre-hearing brief indicates that improvement of the court system is another priority area for improvement. Would you recommend additional training or other means by which improvement could occur?

**IIPA Response:** Additional training for judges is crucial in our view. Judges should be trained in the basics of IP laws and the importance of deterrent sentencing. Judges should also be sensitized to the significance of IP offenses and the damage IP offenses cause to creators, as well as the impact lack of deterrence in IP cases has on Lebanon. In addition, IIPA recommends that a special IP prosecutor and a special IP court be created.

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members of the Cyber Crime & Intellectual Property Rights Bureau. BSA, IFPI and MPA provided training on identifying pirate product as well as computer forensic training. These three groups also provided hardware (PCs, printers, etc.) worth US\$15,000, and arranged for advanced computer forensic training in the United Kingdom for two officers of the IPR Unit

Publishers worked with the MOET in late 2005 (and continuing as possible into 2006) to raise awareness of the importance of copyright on university campuses. The Ministry agreed to partner in the production of promotional material to be distributed to bookshops, libraries and universities during the high copying season toward the start of the university terms in early February 2006. Publishers agreed to work with the Ministry to organize educational seminars and ask university presidents to get involved by sending letters to their deans and department heads about illegal photocopying. IIPA believes that progress on this initiative has slowed or stalled, likely due to the current political situation. We will continue to monitor this partnership in 2007 and would like to encourage the Lebanon government to lend its full support to these endeavors.



**Additional Questions:**

1. How can U.S. training efforts coincide with Industry training efforts?

**IIPA Response:** The Special IPR Cybercrime Unit needs and desires to have more specialized training. U.S. government and industry training efforts should proceed in a coordinated manner. We recommend that the U.S. government devote some resources to assist in the training of the Special IPR Cybercrime Unit.

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2. How many people belong to the IPR-Cyber Crime Unit? What is their budget?

**IIPA Response:** In our 2007 Special 301 report, IIPA reported that IPR Cybercrime Unit consisted of 5 ranking police officers and 20 junior police officers. We now understand that the IPR Cybercrime Unit has about 33 total officers, including 15 ranking police officers and 18 junior officers. Like all other police units, the IPR Cybercrime Unit does not have a formal budget.

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Thank you very much for providing us with this opportunity to respond.

Sincerely,

Michael Schlesinger  
International Intellectual Property Alliance