Dear Ms. Espinel,

I am NOT a 'rights holder' of a published work.  However, you need to take into account the real needs of the reading public concerning rights protection, Digital Rights Management (DRM) and e-book sales.  As a reader, I look for e-books that are easy to download and easy to transfer between the several reading devices I own.  Currently I own, and use for reading, a desktop computer, PDA, iPod Touch, Sony PRS-500 ereader (supporting ePub), Bookeen Cybook Gen3 and Kindle 2 (both supporting .mobi).  A close relative living with me uses a laptop, PDA and Kindle 2 for her reading needs.

First and foremost is the fact I need to be able to be secure in my ability to back up and save offline the ebooks I purchase.  But I can do this with a CD/DVD burner so I am good with that.

Second is being able to read any e-book I purchase on any of my devices.  Herein lies the problem.  Current DRM used on 'secure' ePub e-books is completely different than that used by Amazon on their .azw and .tpz/.azw1 e-books.  Thus, to read any of these e-books on any of my devices requires me to remove that DRM!  (Of course, doing so is, possibly, 'illegal' even though I *bought* the e-books in question.)  Further, if the e-book vendor goes out of business, I could find myself unable to read my purchased e-books.  This also occurs if I choose to switch to another e-book reading device as the manufacturers tend to switch file formats as they 'upgrade' features.  This, when you take into consideration that I spend between $200-$400 for the actual device as well as the $6-$15 I spend on each e-book, is patently unfair to me as a customer.  With a form of DRM that is common across reading devices, this problem would disappear.

So please first target making a platform- and format-independent DRM scheme as a standard that all manufacturers must support.  Second, each e-reader has features that the others don't, so it is important that while manufacturers should be able to create their own file format for the e-books, they should have to at least support basic reading of the two major formats (.ePub and .mobi/.azw).  Doing so would go a long way towards making the average reader willing to comply with 'rights holder' protection and DRM security.

Derek