

ISSN: 1597-7560

VOLUME 4

NUMBER 1 & 2

2009

INTERNATIONAL *Journal* of



LAW &

Contemporary Studies

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INTERNATIONAL JOURNAL

OF

LAW

AND

CONTEMPORARY STUDIES

VOLUME 4
NUMBER 1 & 2
2009

ISSN: 1597 - 7560

INTERNATIONAL JOURNAL OF LAW AND CONTEMPORARY STUDIES

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E-mail: devconsort@yahoo.com, devconsortpress@yahoo.com
Tel: +234 - 803-7103742, 084554735, 08082321028, 07070252504
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ISSN: 1597 - 7560

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INTERNATIONAL COPYRIGHT DIMENSION OF INTERNET PUBLICATIONS: AN OVERVIEW

ARAROMI MARCUS AYODEJI

Abstract

In the past few decades, there has been explosion in the use of the Internet. Many things that are done traditionally are now being taken over by sophisticated gadgets, which allow prompt, easy and efficient delivery of goods and services. Moreover, the Internet also serves as a platform for researches in almost all the fields of human endeavour. It is not surprising therefore that the Internet, given its international status of accessibility, constitutes an international field, which cannot only be studied, or confine to a particular locality. It is based on this nature of the Internet that attempt is being made to give a legal analysis or overview of copyright protection of materials or works uploaded into the Internet. This study is embarked upon to consider the seamless nature of the Internet in the face of national copyright protection granted to works created in each country and which has no extra territorial application.

Introduction

Copyright has become a popular law subject in most jurisdictions. It has constituted an important aspect of the law based on the assurance of protection of products of intellectual and productive activities embarked upon by man. The issue of copyright has not been limited to the traditional modes of putting the products of intellectual activities into a readily visitable formats, it has also become an exceptionally popular subject in the virtual world. A search through some search engines or a visit to some web sites may give unrestricted access to some intellectual materials, which are put up for regular or

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International Journal of Law and Contemporary Studies Vol. 4, No. 1 & 2
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easy visitations. A simple search through search engines, like Google, Alta Vista or any of the web crawlers usually leads to arrays of articles, advertising announcements, academic sites, uploaded music, databases etc.

Nowadays, the Internet has constituted a valve for a wide source of information, entertainment, and communication. Many people believe that anything and everything goes in cyberspace. There is therefore, a tendency for Internet users to cross over hidden lines. Without proper knowledge, users unintentionally break the copyright laws that govern the internet.¹ Given the fact that the internet is not seated in any country; the question now is which law governs this super highway? A writer has rightly said that a right for rapid and revolutionary development in all facets of human endeavour can be successful only through the right development of our intellectual pursuits, and the laws governing those pursuits.² It is important therefore to see the legal protection regime in the traditional copyright vis-à-vis the international dimension of copyright law as regards internet breach of such a right.

Philosophy of Copyright Protection

Copyright gives protection to a wide range of works and has developed enormously since its early inception as an important intellectual property right.³ Copyright extends to all manner of works regardless of quality. During the twentieth century, copyright got a boost and was extended to photographs, films, broadcasts, sound recordings, cable programmes as well as computer programs, preparatory design material for computer programs, databases and works stored in or produced by or with the aid of a computer.⁴

The development in the twentieth century era in copyright protection also addressed issues relating to copyright and neighbouring rights associated with the information society.⁵ It is important to see some legal approaches to copyright protection. Different views have been held by the courts on what copyright protection and cover. Mr. Justice Peterson said in *University of London Press Ltd v University Tutorial Press Ltd*⁶ that:

“..... what is worth copying is *prima facie* worth protecting”

However, this assertion goes too much on the far side. A rather acceptable standard is that such work must be the result of skill and judgment i.e. some measure of originality must be involved. Otherwise, preventing people from copying just anything that has been done before will only retard growth and development. As Pumpfrey J. said in *Cantor Fitzgerald International v Tradition (UK) Ltd*⁷

“..... it is possible that entirely mechanical labour may be saved by copying something produced by entirely mechanical labour; involving no skill.”

It should be realized that the Copyright, Designs and Patents Act 1988 in the United Kingdom and the copyright legislation in the United States of America require in clear terms originality in the work to be protected by copyright. This has traditionally been regarded as a minimal requirement in both the United Kingdom and the United States.⁸ But the United Kingdom Act does not require that the expression must be in an original or novel form, but that the work must not be copied from another work – that it should originate from the author.⁹ In a somewhat similar manner copyright protection can only be extended to a literary, musical or artistic works in Nigeria if sufficient effort has been expended on making the work to give it an original character.¹⁰ This requirement is one of the pre-conditions in copyrighting such works.

By virtue of section 1 of the Copyright, Design and Patent Act 1988 of the United Kingdom, the following works are subject to copyright protection,¹¹ viz:

- (a) original literary, dramatic, musical or artistic works;
- (b) sound recordings, films, broadcasts or cable programmes, and
- (c) the typographical arrangement of published editions.

Though the first category of works is required to be original, it does not mean that the works must be unique or special in any way. The minimum requirement is that such works must be a result of skills or judgments on the part of the creators of the works and must not have been copied from other works. In essence, the works within the category must be a result of the authors' intellectual creation.

The owner of a copyright in a work is given an exclusive right to exercise certain rights on that work, which other persons are restricted from doing. Copyright bestows similar protection given to ownership of property. In other words, copyrighted work can also be regarded as property right and can be dealt with just like any other property.¹² The acts restricted by copyright which only the owner of the copyrighted has the right to do or authorize may include:

- (a) copying the work;
- (b) issuing copies of the work to the public;
- (c) renting or lending the work to the public;
- (d) performing, showing or playing the work in public;
- (e) broadcasting the work or including it in a cable programme service, and
- (f) making an adaptation of the work or doing any of the above in relation to an adaptation.¹³

Thus, a person infringes the copyright in a work if he does any of these restricted acts or authorizes any other person to do any of the acts in relation to a substantial part of the work without the permission of the copyright owner and such a person may be sued by the copyright owner for intrusion into his right.

There are two viewing sides to the issue according to copyright protection to works derived from intellectual exercises of the authors of the works. The first is that a creative writer, an artist or an artiste has full and undeterred protection of the work, which he had created, and he should also be able to derive adequate and unalloyed benefits from his efforts. The second perspective is that the general interests of the intellectual and artistic development of mankind, the dissemination of ideas and knowledge should not be unduly impeded.¹⁴

It is not out of place for a creator, or an inventor who has ploughed his time, energy and money into the creation of certain things, and has also gone through some intellectual brainstorming, to seek to guard jealously what he has actually achieved through this exercise. Such a creator or inventor may want to obtain the maximum economical benefit, and also obtain social accolade and recognitions for his creation or invention, devoid of economic benefits. Therefore, such a creator or inventor must look forward to the necessary protection the law of the state can afford, if the state itself is also to benefit from his creative prowess.

In other words, the state must be willing to offer and give the needed protection so that such a creator or inventor may be encouraged to use his intellect for the betterment of himself, the state and mankind. If the state could offer such a protection such a creator or inventor would be encouraged to make more inventions, as their security would be guaranteed. However, the owner of an intellectual property must be kind enough to allow the society to share out of the products of his intellectual achievement. Thus, fair use is one of the most important, and least clear-cut, limits to copyright. This permits some used works.

Copyrights and Internet Publications

Works in their various degrees and manners can now be stored electronically. Works such as literature, music, works of art, audio-visual works and industrial designs can be represented in digital form. It has been observed that the ease with which all forms of creative expression can be exploited digitally has far-reaching consequences as regards the dissemination of information¹⁵ and has geared up the exiting prospect of a global information village.¹⁶ One of these digital possible creation and storage media is the internet which has been described as information Super High Way. Other media offering digital storage of intellectual materials include compact disc (CD) or digital versatile disc (DVD).

Little wonders therefore that these new technologies bring about considerable challenges to copyright law and the traditional role of copyright. Some experts are of the opinion that copyright is in crisis due to this landslide development in technology. The Internet, which will be broadly defined later in this work, has universal tentacles and can thus be accessed all over the world. This presupposes an international

dimension of copyright protection in material loaded into the Internet. In the same vein, cable television and satellite broadcasts could ignore boundaries also making effective control by copyright owners often impossible.¹⁷ Uploading materials into the memories of computers with ease and direct access to them through satellites, cable and telephone lines makes it very easy to reproduce them in homes and offices with the aids of sophisticated terminals.

It is very important to give the definitions of certain terms in order to properly understand them in the contexts in which they are used. It is as a result of this that attempts will be made to describe the terms "publication" and "internet". Moreover, the nature of the Internet will also be addressed in this section. Publication is a technical term in legal contexts and especially important in copyright legislation.

The Oxford Advanced Learner's Dictionary¹⁸ defined publication as follows:

- (1) the act of printing a book, a magazine, etc and making it available to the public; a book, a magazine, etc that has been published,
- (2) the act of printing something on a newspaper, report, etc so that the public knows about it"

Publication can also be described variously as the act or process of publishing printed matter; an issue of printed material offered for sale or distribution; or communication of information to the public.¹⁹ In the United States of America²⁰, publication is defined as follows:

"The distribution of copies or phonorecords of a work to the public by sale or other transfer of ownership, or by rental, lease, or lending the offering to distribute copies or phonorecords to a group of persons for purposes of further distribution, public performance, or public display, constitutes publication. A public performance or display of a work does not itself constitute publication".

It is provided further by this code that to display a work 'publicly' means:

- (1) to perform or display it at a place open to the public or at any place where a substantial number of persons outside of a normal circle of a family and its social acquaintances is gathered; or
- (2) to transmit or otherwise communicate a performance or display of the work to a place specified by clause (1) or to the public by means of any device or process, whether the members of the public capable of receiving the performance or display receive it in the same place or in separate places and at the same time or at different times.

Deductively, publication is bringing certain things into the public knowledge as against private cognizance. It thus involved making intellectual works available for the public glare, which in no way decreases the rights of the owner of the published work.

Consequently, literary works, musical works, artistic works, cinematograph films, sound recordings and broadcasts, etc even though made accessible to the public are under the protection of copyright law.

At this point, it is also germane to consider some of the attempts made in defining the term 'internet', which is also another important phenomenon in this right up. On October 24, 1995 the Federal Networking Council (FNC) in the United States of America unanimously passed a resolution defining the term 'internet'. The definition was developed in consultation with the leadership of the Internet and Intellectual Property Rights (IPR) Communities. By its resolution, the Federal Networking Council (FNC) agrees that the following language reflects its definition of the term 'internet'. "Internet" refers to the global information system that

- (1) is logically linked together by a globally unique address space based on the Internet Protocol (IP) or its subsequent extension / follow-ons;
- (2) is able to support communications using the Transmission Control Protocol/ Internet Protocol (TCP/IP) suite or its subsequent extensions/follow-ons, and/ or other IP compatible protocols, and
- (3) provides, uses or makes accessible, either publicly or privately, high level services layered on the communications and related infrastructure described therein".

The Internet Protocol (IP) is the method or protocol by which data is sent from one computer to another on the Internet. Each computer (known as a host) on the Internet has at least one IP address that uniquely identifies it from all other computers on the Internet.

The Internet can also be called the 'information superhighway' and the 'network of networks'. It is basically a means of connecting a computer to any other computer anywhere in the world. It is possible that when two computers are connected over the Internet they can send and receive all kinds of information such as text, graphics, voice, video and computer programmes. The term 'Internet' also refers to the global network of public computers running Internet Protocol. The Internet supports the public World Wide Web (www) and many special purpose client/server software systems. Internet technology also supports many private corporate intranets and private home Local Area Network²¹.

The internet technology is regarded by some people as a public domain, which allows easy access to materials or works loaded into the webs. Today it is possible to subscribe to a Nigerian newspaper, order for an American journal or an American magazine, and listen to a British radio broadcast over the Internet. In most cases the internet is taking over a lot of things, like service delivery, which are done manually in the traditional set up. Many materials or works may now be digitally packaged and delivered to the end uses at a negligible time count. Consequently, the traditional ways of packaging

goods and services are now going moribund. Field Jr. while making a comment on the traditional publishers said:

“Already, journal publishers are feeling the ground shift beneath them as the Internet takes over one of their main roles: the timely distribution of written works. Compared with the speed of the Net, the months-long process of putting out a journal seems tedious”²².

Generally, information technology has begun to have and will continue to have indelible impacts on the ever-growing society and the way the society conducts its affairs. As earlier stated, many intellectual materials can be accessed on the internet all over the world, and they are susceptible to copying. One cannot go without saying that the growth of the internet and its unique and volatile nature has posed novel and complex legal problems. In most cases, the law has been found wanting in dealing with the issues raised by computers and the efforts of the legislators and the courts to come to terms with the technology have sometimes appeared clumsy²³. Publishing works on the internet looks very easy and attractive at first sight. One of the reasons being that one can get to a wide range of audience all over the globe. It is also an effective way of making available intellectual property to a wide audience at minimal expense. These opportunities afford many writers, creators and inventors the ability to spread their works on a worldwide scale. A handsome number of academic journals are now appearing on-line.

Many of the writers of these journals put them up on the web without expecting any pecuniary rewards from any quarters. However, the chunks of publications loaded unto the internet are for monetary gains. A large number of authors depend on the income-generated from publishing their works, as well as their publishers. It is not out of place therefore for the authors of these journals to seek legal protection of such products of their intellectual activities, especially the pecuniary stake they have in such publications.

Typically, individuals can gain access to works on the Internet and may download such works without any hindrance. Some people hold the view that the internet is a public domain and anything done or available through it should be free and can thus be copied without paying any dime to the author(s) of the work. However, Bainbridge²⁴ has observed that contrary to the view that the Internet is equivalent to the public domain it does not affect the fact of subsistence of copyright and other rights. It has also been concluded that nothing modern and creative is in the public domain anymore unless the owner explicitly puts it in the public domain. For example, by having a note from the author/owner saying, “I grant this to the public domain”. Therefore, anybody who stumbles upon it can use, take, or copy it without giving credit to the owner.

Digital publication of intellectual materials falls under electronic publishing, though the precision and scope, of such publication has not been finally settled. However, it could include publication by one of the following methods:

- (i) Sale, rental or lending of a physical carrier containing a copy of the work or works in question - for example, CD, DVD, magnetic disk or magnetic tape;
- (ii) By means of communications networks – for example, the Internet, other on-line facilities or intranets, or by means of a broadcast, whether or not encrypted and whether or not in digital form, for example, CEEFAX²⁵

All these three forms of electronic publishing are capable of copyright subsistence. However, it has been opined that using electronic means for publishing does not necessarily mean electronic publishing²⁶.

Electronic publishing has been viewed as a complex phenomenon, which utilizes a combined effect of computer technologies with advanced communications systems, which may lead to a completely new structure of creation and utilization of works protected by copyright. Electronic publishing then include 'the means of storage, shaping, updating and making available by electronic means of information in written or graphic form to a circle of people or to the general public'²⁷. The Internet by its nature has a global accessibility and thus presupposes a multi-national potentially applicable law where a breach occurs in that medium.

Internet Copyright and the International Dimension

Due to the varying levels of wealth, economics structures, technological capabilities, political systems and cultural traditions, different countries have different copyright laws. Hence, what is protectable under a country's copyright law may not be protected in another country. Also, what is legal within one country may be illegal in another. So, when we speak of the law of intellectual property, we are generally referring to the law of a particular jurisdiction, like the United States, China, Sweden, France or Italy etc. Under a normal circumstance, a legal practitioner is faced with the intellectual property law of his jurisdiction, and may not need to go into the unnecessary details of what copyright protection is recognized in other jurisdictions. In essence, the common case is that a legal practitioner will only be acquainted, or rather be concerned with the intellectual property law regime of his immediate jurisdiction. Because of the rise of global commerce and the increasing importance of intellectual property, most nations of the world have entered into a series of treaties, unions and conventions.

However, what is more is that several efforts have been made in time and space to harmonize national laws on intellectual property through a number of multi lateral conventions that have been concluded. Many of these conventions and international treaties or intellectual property laws have consequential direct effects on a national laws

or this subject. For instance, section 5 of the Nigerian Copyright Act²⁸ provides as follows:

- “(1) Copyright shall be conferred by this section on every work if: (a) on the date of its first publication at least one of the authors is: (i) a citizen of or domiciled in; or (ii) a body corporate established by or under the law of a country that is a party to an obligation in a treaty or other international agreement to which Nigeria is a party;
- (b) the work is first published: (i) in a country which is a party to an obligation in a treaty or other international agreements which Nigeria is a party; (ii) by the United Nations or any of its specialized agencies; (iii) by the Organization of African Unity²⁹; or (iv) by the Economic Community of West African States”.

It is important to state that with the increase in the level of international trade, and now, the Internet which has opened the border lines of every nation and transformed our world into a global village, it is germane to understand not only the law of one's jurisdiction, but also very important that the laws of other jurisdiction be understood together with international conventions, agreements and treaties that regulate intellectual property by means of bilateral multilateral commitments³⁰.

As stated earlier, copyright laws and regulations at national level have different rudiments and developments. This has given rise to the dissimilarities in the copyright laws of different countries. Despite the differences in these copyright laws, one common denominator is that they have no effect outside their own territories³¹. In other parlance, the field of application of national copyright legislation is limited to the territory of the state, which enacts it. However, it is trite that intellectual works cross borderlines and the interests of the owners in such works need to be salvaged. It is due to this reason that many nations have gone into bilateral and multilateral agreements. These agreement create room for mutual recognition of rights, but their contents are neither adequate to cater for the problems of international protection of copyrightable materials, nor are such agreements uniform³².

The need for a uniform regime led to the formulation and adoption of the Berne Convention of September 9, 1886 for the protection of literary and Artistic Works by the contracting states, which formed themselves into a union therefore giving copyright protection to authors of works in the countries of the union. Instruments of accession or ratification are deposited with the Director-General of the World Intellectual Property Organization (WIPO). WIPO is responsible for the administration of, and activities concerning revisions to, the international intellectual property treaties³³. Other WIPO principal copyright and neighbouring rights convention include the International Convention for the Protection of Performers, Producers of Phonograms and Broadcasting Organizations (Rome Convention) and the Geneva Convention for the Protection of Producers of Phonograms Against the Unauthorized Reproduction of their Phonograms (Geneva Phonograms Convention)³⁴.

The Berne Convention is the principal and the largest international copyright convention and includes the most detailed provisions. Though it can be regarded that the Berne Convention provides an apparently adequate international standards of protection, it is believed in some quarters that it should be updated to account for advances in electronic communications and information processing technology³⁵. The membership of the Berne Convention is constituted by the world's major legal traditions. The Anglo-American Common Law Copyright System and the European Civil Law *droit d'auteur* system³⁶. However, despite the detailed provisions in this convention and partly because it must accommodate differing legal traditions, in some areas its standards may be insufficient to deal with the world of digital dissemination of copyrighted works³⁷. Moreover, the Rome Convention³⁸ of 1961 is also considered inadequate for dealing with the problems raised by current technology advances and the level of trade in the products and subject matter affected by its operation.

Apart from the traditional WIPO forum which coordinate some international intellectual property treaties, there also exists the World Trade Organization (WTO). This organization administers the agreement or Trade-Related Aspect of Intellectual Property (TRIPS). It has been opined that with ongoing integration of the world economy, and with production becoming more "technology intensive", there was a concern that the absence of a multilateral framework (including rules) for addressing intellectual property issue could create problems, including tensions in international commercial relations. The TRIPS³⁹ Agreement thus defines standards of intellectual property rights and enforcement mechanisms for individual countries to follow, and incorporates into the existing dispute settlement mechanism of the WTO. It defines these standards by reference to existing agreements concluded under the umbrella of the WIPO. The TRIPS Agreement contains provisions to ensure that parties to the Agreement fully implement obligations under it. After defining the relationship between the TRIPS Agreement and the Berne Convention, the TRIPS Agreement reiterates the basic principle of copyright protection – that protection extends only to expression and not to ideas, methods of operation, or mathematic concepts. Apart from the WTO, there are other international organizations working in the area of intellectual property. For instance, UNESCO⁴⁰ works with copyright, as well as with cultural property and the protection of the intellectual property of developing nations.

It is without doubts that world wide high-speed digital communications network, including the information superhighway known as the Internet, will have an enormous effect on the way in which works of authorship will be created, stored, communicated to the public, distributed and paid for. However, with the spate of development of information dissemination systems, especially the Internet, a user in one country may be able to manipulate data in another country in a way that may violate that country's copyright laws.

More so, the determination of where and when possible infringements might have taken place may constitute a fundamental problem, taking the nature of the working of the Internet. Take for instance, a user in France may access a database in Germany and have such downloaded to a system in Holland. The problem here is which copyright law will apply to this situation? If we are to say that it is subject to domestic copyright law, how do we determine the domestic law? The fact that copyright laws are territorially based leaves much to be desired in a case of this nature, and the standards of protection embodied in the international conventions leave room for national legislative determinations, therefore acts that may constitute infringement in one country may not be so in another country⁴¹. This creates an unsecured avenue for information publication through the 'superhighway', therefore an urgent need to work towards a new level of international copyright harmonization.

As clearly elucidated by the National Information Infrastructure (NII) in one of its papers⁴², it states as follows:

"As we move towards a world where dissemination of entertainment and information products through on-demand delivery services operating through interactive digital information communications networks is the norm, it may be necessary to harmonize levels of protection under disparate systems of copyright, authors' rights and neighbouring rights, and consideration should be given to ways to bridge the gaps among these systems."

The harmonization may take its offshoot from the work of WIPO which is considered digital world of the global Information Infrastructure (GII) in order to set sound policy, and select the essential elements of the present Berne Protocol and New Instrument texts and work towards reaching international agreement on them. Thus, principles should be evolved to protect an economic rights of providers of entertainment and information products and such principles should be based on the principles of 'national treatment', which include, under a nation's laws, a foreigner enjoys no lesser rights and benefits than a citizen of that nation receives, subject to be the specific terms of the relevant international conventions. This principle can then be made amenable to each country participating in the GII.

Moreover, no country belonging to the GII may, as a condition of according national treatment, require rights holders to comply with any formalities in order to acquire rights in respect of literary and artistic works or fixations embodying such works⁴³. It has however been suggested that in order to attain the needed level of protection internationally, ways to harmonize the disparities between the continental *droit d'auteur* and neighbouring rights systems and the Anglo American copyright systems must be developed, with the effort to establishing standards that can be implemented through either system⁴⁴.

Another method that can be deployed in preventing unwanted intrusion into works available on the Internet is a technological measure. The use of technical security measures and prohibition of devices and services whose primary purpose or effect is to defeat technical security measures. A technological measure is effective when the use of the work or other subject matter is controlled by access controls or protection processes such as encryption, scrambling or other transformation are copy-control mechanism which achieves the protection objectives.

CONCLUDING REMARKS

The issue of copyrighting materials or works available on the Internet constitutes a complex whole of problems that cannot be single-handedly resolved by an individual or a nation. It is an international phenomenon, which can be addressed at the international platform. It is essential therefore that all the nations of the world constitute a league to bring about principles and standards deployable to address the knotty issues appertaining to protection of works on the Internet. The league may also take it upon itself to resolve the unavoidable question of jurisdiction in adjudicating breach of rights of the author on a work. A uniform copyright convention can address the problems of applicable law in the Internet breach of right to copy other people's works, or misuse or other unwanted use of the works. If such uniformity is achieved, the problem of determining applicable law in copyright suit will not be based on the law of jurisdiction of where the server or Internet service provider is based nor where such a material is uploaded without more.

Where uniformity in law is attained at this level, what will be in contention will be the issue of jurisdiction which will also have a little or no effect, since no matter the forum of bringing an action for a breach of copyright on the Internet the same or similar provisions of law will invariably be applied. Since the Internet has no sitting place, what needs be considered therefore will be the convenience of the parties to the suit, which goes a long way in ensuring justice in any matter before a court where foreign elements are involved⁴⁵.

The determination of the forum for a suit should be on the basis of a court that is most convenient for the parties involved, this may also take cognizance of the issue of the court of the most significant connection to the matter, taking into consideration the habitual place of abode of the parties, the place where such material is downloaded or where the breaching act is committed, whichever is most convenient in ensuring justice. The works of the WIPO can be taken as a starting point for the attainment of harmonization of national laws with a view of achieving a set standards and principles creating a uniform legal regime for copyrighting materials or works on the Internet.

Content providers of internet materials/works need to have a secured and reliable means for delivering information products and services to the consumers. In other words, the content providers must be confident that the systems developed to distribute these

works will be secured. If such could not be achieved by these providers, the realization of their commercial gains will be dampened. They will therefore not be motivated to use the internet medium. It is incumbent upon the Internet Service Providers (ISP) to ensure security of the works of these content providers. Technology will play a central role in implementing controls on the access to and use of protected works at both the file and server levels. Distribution of digital works can be regulated by controlling access to the source of copies of the works – information or data servers. Access controls is affected through user identification and authentication procedures that may deny access to unauthorized users to a server or to particular information on a server. Other techniques for protecting works in this medium include; encryption, digital signature and steganography.

At this point, a proper synergy between harmonization of copyright laws and the use of technological methods will provide the much needed protection to the works uploaded unto the internet. This will give adequate confidence in publication through this medium thereby ensuring maximum security of the works and encouragement to the content producers.

END NOTES

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FOOTNOTES

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- ⁶ [1961] 2 ch. 601
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- ⁹ *University of London Press v University Tutorial Press* [1916] 2 ch. 601 at 608, C.A.
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- ¹¹ Relatively similar provision is contained in section 1 of the Nigerian Copyright Act cap. c28 L. F. N. 2004.
- ¹² David Bainbridge *op. cit.*, p. 16.
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