

Proposing a Framework for Copyright of Library Resources in Iran: A Comparative Study of Copyright Laws in Iran, Australia, and the United States

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Abstract

Purpose: This study analyzes the copyright laws of Iran, Australia, and the U.S., as well as library portals, to propose a copyright framework for the National Library and Archives of Iran (NLAI). This framework considers Iran's current domestic legal landscape.

Method: As an applied, qualitative study, it employs documentary and comparative analysis. The research focuses on the National Library of Australia (NLA), the Library of Congress (LC), and the NLAI. The primary legislative documents analyzed are Iran's Law for the Protection of Authors, Composers and Artists Rights (1970), Australia's Copyright Act (1968), and the U.S. Copyright Law (1976).

Findings: The study identified seven key dimensions for the proposed framework: fair and non-profit use, copyright duration, licensing agreements, copyright policy, moral rights, economic rights, and copyright infringement. These dimensions comprise 49 main components.

Conclusion: Acknowledging differences in national copyright laws, each country tailors its legislation to its specific context. Examining other jurisdictions can effectively inform the improvement and development of copyright laws. This research aims to enhance librarian awareness, assist in developing copyright policy at the NLAI, and aid legislators in revising copyright laws concerning library exceptions and limitations.

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Introduction

Libraries provide resources in various physical and digital formats, which is crucial for their dissemination and accessibility. These diverse resources—including books, manuscripts, theses, newspapers, photos, maps, and digital media—are maintained within library systems and made accessible to users, subject to certain restrictions.

In most countries, national libraries serve as central reference institutions. While they aim to ensure maximum access to their collections, they must also operate within copyright laws. Many national libraries are legally permitted to provide copies of materials, a practice that balances copyright owners' rights with society's broader needs (Cornish, 2006). In light of new information formats and the open access movement, copyright law increasingly influences how libraries provide information. Consequently, libraries now face more complex intellectual property issues than in the past. Traditionally, libraries have advocated for a balance between copyright holders and users, promoting intellectual freedom and access to information (Hossain, 2020).

Copyright is a vital concern for national libraries, which often hold resources owned by others and must manage copyright responsibly. Balancing rights holders' protection with user access remains challenging. Library resources can be classified by copyright status as follows:

- Copyright-protected works;
- Public domain works, where copyright has expired;
- Anonymous works of value (Panezi, 2014).

Many libraries worldwide have documented copyright policies and procedures. However, despite ongoing efforts to develop data policies in Iran, there are still no comprehensive guidelines for respecting economic and moral rights of library resources in all formats. The absence of such guidelines hinders sound decision-making regarding resource provision and access, ultimately limiting information dissemination.

To address this, libraries require a structured copyright framework. Given the role of the National Library and Archives of Iran (NLAI) in aggregating and disseminating Iran's written heritage, it should establish a national copyright framework for library resources. This involves both legal and technical dimensions; the present study focuses on legal aspects.

Iran's Law for the Protection of Authors, Composers and Artists Rights recognizes moral rights (e.g., decision-making regarding publication, respect for the creator's name) and economic rights (e.g., reproduction, performance). Copyright protection in libraries such as the

National Library of Australia (NLA) and the Library of Congress (LC) is well-established under their respective national laws.

This research analyzes Iranian copyright law, Australian and U.S. copyright legislation, and the policies of NLA and LC to propose a copyright framework tailored for NLAI, considering Iran's current legal and cultural context.

The study aims to 1) Enhance awareness among librarians regarding copyright issues; 2) Support legislators and policymakers in developing and amending copyright laws suited to contemporary societal needs. Accordingly, the research tried to answers to the following questions:

- How are information resources addressed under copyright laws in Iran, Australia, and the U.S.?
- How is copyright perceived and implemented at NLAI, NLA, and LC?
- What framework can be proposed for copyright management of information resources at NLAI?

Literature Review

A review of the literature indicates that studies on copyright in libraries generally adopt one of three approaches: a) copyright of theses and dissertations, b) copyright in libraries, and c) the role of librarians in copyright protection. Key studies representing these approaches are summarized below.

Copyright of Theses and Dissertations

Several studies have focused on determining ownership and identifying rights holders within academic institutions. These include Rezaei (2011), Papi (2015), and Beigzadeh and Rasouli (2016). Other research, such as Horri (1993), Andrew (2004), and Gasaway (2003), has examined ownership of theses and related library policies. Yjing (2012) analyzed the copyright status of theses and dissertations in China, while Schöpfel and Soukouya (2013) addressed licensing for the dissemination and digitization of these works.

Copyright in Libraries

Crews (2008) conducted a comprehensive study of copyright exceptions for libraries and archives across 184 countries, categorizing statutory provisions into three types: 1) broad exceptions allowing reproduction for research without explicit limits; 2) exceptions permitting reproduction of all or most work types for research; and 3) exceptions limited to specific

types of works. Panezi (2014) addressed legal challenges for online digital libraries, classifying resources by copyright status—copyrighted, of ambivalent status (e.g., orphan or out-of-print works), or in the public domain—to help librarians prioritize user access.

Ghabooli Derafshan, Mohseni, and Ghasemi (2013) identified three types of permitted copying in libraries: user requests, preservation/replacement, and inter-library lending. They noted that Iranian law only explicitly permits copying at user request, limiting libraries' ability to offer full services.

Byrd (1981) evaluated the impact of new U.S. copyright legislation on libraries, finding broad compliance with minimal disruption to services. The Electronic Information for Libraries (EIFL, 2009) handbook provided a model for copyright policy manuals, covering topics such as technological protection measures, exceptions and limitations, legal deposit, orphan works, database rights, and open licensing.

Abu Sirhan (2010) assessed Jordanian copyright law's protection for rights holders and libraries, highlighting gaps in enforcement and resources and recommending legal reforms and capacity building. Yoon and Kim (2012) compared Korean copyright exceptions for persons with disabilities to those in the U.S., U.K., Germany, France, and Japan, proposing amendments to improve accessibility.

Congleton and Yang (2017) compared teaching exceptions in U.S. and EU copyright law, advocating for flexible interpretations to support education. Lear (2022) explored the use of video resources in libraries during the COVID-19 pandemic, suggesting controlled digital lending as a solution. Papi (2024) analyzed preservation and copyright policies across 36 Iranian and international libraries, identifying key policy areas: moral and economic rights, non-profit use, licensing, fair use, and infringement.

The Role of Librarians in Copyright Protection

While less directly related to this study, some research has examined librarians' responsibilities in balancing access and copyright. For example, Onoyeyan and Awe (2018) surveyed Nigerian librarians on their role in copyright enforcement, finding that policies on journal/multimedia use and licensing agreements with providers were common.

Conclusion from Previous Studies

The literature shows varied focus areas: some studies address electronic theses ownership, others analyze national copyright laws and library

practices, and a few explore general copyright concepts like technological protection, legal deposit, or orphan works. However, only limited research has specifically addressed the copyright laws of Iran, Australia, and the U.S. in a library context. For instance, Ghabooli Derafshan et al. focused only on reproduction in Iranian law; Byrd (1981) and Congleton & Yang (2017) examined U.S. compliance and educational exceptions, respectively. Papi (2024) conducted a broad survey of libraries, whereas this study offers a focused legal analysis based on the WIPO-endorsed framework of Crews (2008), examining the national libraries of Australia (NLA), the United States (LC), and Iran (NLAI).

This study aims to fill this gap by proposing a copyright framework for library and digital resources—from a legal perspective and considering library exceptions—to help libraries develop systematic and codified copyright policies.

Method

This is an applied study using a qualitative approach to achieve its objectives. To this aim, related resources, documents and laws were reviewed and analyzed, and the current state of libraries in selected countries was compared. Based on this, documentary analysis method and comparative method seemed to be appropriate methods to be used for finding an answer to the problem and questions about the research. Moreover, data were collected through searches in various texts, resources and studies as well as through the websites of selected libraries of the research community. Furthermore, laws such as the Law for the Protection of Authors, Composers and Artists Rights approved in 1970 were studied and reviewed. The Law mentioned is the first comprehensive law on author's rights in Iran. In law, legal articles are stated for the moral and economic rights, fair use and violation of the rights of the creators of the works. The analysis of this law is mentioned in the table 1.

The comparative method was also used in this study. In comparative research, differences and similarities are identified. Accordingly, various keywords and phrases related to the concept of copyright, such as: "Data Policy", "Copyright", "Intellectual Property", "Data Management", "Data Ownership" and "Data Retention" were searched in the portals of the selected libraries and the related resources were studied.

Research Population

Since the NLAI, as a national institution, has authority, among other

libraries of Iran and has diverse resources available to users, it was selected as the research community to examine the copyright of the resources. The NLA and LC were selected because these two libraries serve as pattern for some of the library services in the NLAI. In addition, examining the portal of the two mentioned libraries has provided more comprehensive information regarding copyright issues.

Finally, the two NLA and LC together with the NLAI were used as the research community. The mentioned portals were reviewed in the range of November 2022 and 2024.

Although the legal system in the U.S. and Australia follows the Common Law system and is different from that of Iran, but, the complete and comprehensive information and operational frameworks and guidelines on Copyright in the libraries of these two countries were among the reasons for their selection in this comparative study. So, the Law for the Protection of Authors, Composers and Artists Rights (1970); the Copyright Law of Australia (1968) and the U.S. Copyright Law (1976) and its amendments were selected as three main resources among other documents and resources.

Data analysis method

In data analysis, considering the objectives and questions of the research, primary and secondary coding and classification were used to analyze the data and provide the final framework. Primary and secondary coding was used in open coding. The first step in open coding was to examine and review the copyright laws of the three selected countries and various regulations and resources multiple times.

The data were reviewed line by line and the main sentences and concepts in each line or paragraph were specified through comments and a code was given for each sentence. Finally, the number of 116 concepts, 18 categories in 13 classes were placed in two separate categories for the analysis of copyright laws and library portals. The researcher tried to control and review the data in all stages of data collection, coding and classification using the self-monitoring technique. In this way, it can be said that the results obtained from this section can be used as a criterion for validity and reliability in qualitative research.

Validity and reliability

In qualitative research, validation, transferability, and dependability are utilized for validity and reliability.

- **Validation:** Triangulation is one of the strategies used to enhance validation in the documentary method. This implies that validation depends on using reliable sources, creating diversity in sources, exploring multiple sources and reading quality, and consulting with experts (Sadeghi Fasai and Erfanmanesh, 2015). In the present study, the research validity was enhanced through the use of reliable sources such as domestic and foreign laws and frequent reference to foreign laws and their comparison with Iranian copyright laws. The derived components were also presented to five specialists with PhD in law and knowledge and information sciences, who were faculty members and had sufficient work experience in libraries, for validation. Their feedback was reflected in the proposed framework. After incorporating their comments, the proposed framework was approved by the mentioned specialists.
- **Transferability:** The transferability index includes a detailed description of the research environment and the use of special procedures for coding and analyzing them in the data analysis stage (Akbari, 2018). The laws were coded and analyzed in the Findings section of the study. Furthermore, the detailed description of the laws and the consistent presence of the researcher contributed to the significance or applicability of the findings in similar situations.
- **Dependability:** It is necessary to maintain an inspection process in any research project. While conducting research activities, it is essential to record the decisions made about research. According to Corbin and Strauss (as cited in Birks and Mills, 2014), any failure in this respect can lead to confusion in the later stages of research, particularly in long-term research. For dependability, all research stages from the beginning to the end have been thoroughly described in the present study. In addition, to verify the extracted components, the experts' opinions were also used to enhance the validity of the research.

Findings

In this section, the copyright laws of the United States, Australia and Iran were analyzed for answer the first question. Also, the portals of the NLA, LOC and NLAI were analyzed to answer another question.

- How are information resources addressed under copyright laws in Iran, Australia, and the U.S.?

To reach a better and more accurate answer to the first research question, several sub-questions about the exceptions and limitations related to libraries were considered in order to examine and analyze the

laws of the three selected countries more accurately. The sub-questions were based on Crews' (2008) research and were as follows: Who can copy? What can be copied? Purpose of the copy? Medium of copy? Other provisions?

In addition to the above questions, the following sub-questions were also considered by the researcher: How much can be copied? How are moral and economic rights? What is the Duration of copyright in works? A code was also given to each category extracted from the law in Table 1, 2 and 3. For example, IR2 code is related to Article 2 of Iran's copyright law. After the qualitative analysis of the laws, the concepts derived from the laws were categorized.

Table 1. Analysis of the copyright laws of the selected countries based on the questions of WIPO and Crews, (2008) in copyright law of IRAN

Copying of Works in Libraries and Exceptions and limitations and Fair Use			
Sub-Question	Concept/s		Category
What can be copied?	-Books, dissertations, pamphlets, plays, audiovisual resources, and any kind of scientific, technical, literary, and artistic resources (IR2)		copyrighted works
	Note	None	
Who can copy?	- Non-profit public libraries; Institutions collecting magazines and articles, and non-profit scientific and educational institutions (IR8b) Ministry of Education (for textbooks) (IR9); Ministry of Intelligence (using ones works, if published and disseminated before the approval of the copyright law) (IR10)		Fair use Non-profit services Non-profit institutions
	Note	According to the regulations that will be approved by the Cabinet of Ministers, libraries copy the works protected by this law through photography or similar ways tailored to their needs and activities.	Executive regulations for 8 Article

Purpose of the copy	- For literary, scientific, technical and educational purposes (IR7a)		Fair use
	Note	For criticism and epigram with reference to the source within the conventional limits	Fair use
Medium of copy?	Copying and recording of radio and television programs (IR11)		Authorized and legal reproduction
	Note	For personal and non-profit use only	
What is the Duration of copyright in works?	50 years after the death of the creator (with heirs and legal successors) (IR12)		Duration of copyright in Iran
	Note	<ul style="list-style-type: none"> - All works become available to the public 50 years after the creator's death if there are no legal heirs or successors. - Joint works (50 years after the death of the last creator) (IR12a) - Works for hire and photography and cinematic works (30 years from the date of release or publication) (IR13) 	Duration of copyright in Iran
How much can be copied? (Is there a limit?)	<ul style="list-style-type: none"> - Non-profit use tailored to the needs and activities (for libraries) (IR7b) - For criticism and epigram with reference to the source within the conventional limits (IR8c) 		Fair use Legal use
	Note	None	
How is Economic Rights?	<ul style="list-style-type: none"> - Economic right, including the exclusive right to publish distribute, offer and perform the work (IR3) - The creator's economic rights will be protected by this law when the work is printed, distributed, published, or performed for the first time in Iran 		Economic rights

	and has not been already printed, published, distributed, or performed in any other country. (IR22)		
	Note	Notably, the economic rights of foreign creators is protected by the law if there is a contract or mutual agreement (IR6).	Economic rights related to law of translation and reproduction
How is Moral Rights?	- Non-transferability of intellectual property rights (IR4); Protection of moral rights of all creators (with Iranian or any other nationality) (IR18); Making reference to the name and title of the work (IR1); Any change or distortion in the works protected by this law and its publication is prohibited without the creator's permission. (IR19)		Moral rights
	Note	None	
Other provision?	The mentioned law has considered damages and punishments for violation of the creator's right. (IR21-31)		Performance guarantee Criminal and civil enforcement
	Note	Article 21-31	

Table 2. Analysis of the copyright laws of the selected countries based on the questions of WIPO and Crews, (2008) in copyright law of U.S.

Copying of Works in Libraries and Exceptions and limitations and Fair Use			
Sub-Question	Concept/s		category
What can be copied?	(1) literary works; (2) musical works, including any accompanying words; (3) dramatic works, including any accompanying music; (4) pantomimes and choreographic works; (5) pictorial, graphic, and sculptural works; (6) motion pictures and other audiovisual works; (7) sound recordings; and (8) architectural works (US102)		copyrighted works
	Note	None	
Who can copy?	libraries and archives; Nonprofit educational institution for instructors or pupils (US108, 110)		Non-profit institutions
	Note	None	
Purpose of the copy	For purposes such as criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research (US107).		Fair use
	Note	- (1) the purpose and character of the use, including whether such use is of a commercial nature or is for non-profit educational purposes; (2) the nature of the copyrighted work; (3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and (4) the effect of the use upon the potential market for or value of the copyrighted work. - The copy or phonorecord becomes the property of the user, and the library or archives has had no notice that the copy or phonorecord would be used for any purpose other than private study, scholarship, or research (US107).	Fair use
Medium of copy?	Reproduction and distribution; communication by an establishment of a transmission or retransmission embodying a performance or display of a nondramatic musical work intended to be received by the general public, originated by a radio or television broadcast station licensed as such by the Federal Communications Commission, or, if an audiovisual transmission, by a cable system or satellite carrier (US 108, 110).		Authorized reproduction, distribution and communication Fair use

			Exceptions and limitations of copyright
	Note	In libraries and Archives	
What is the Duration of copyright in works?	In General, Copyright in a work created on or after January 1, 1978, subsists from its creation and, except as provided by the following subsections, endures for a term consisting of the life of the author and 70 years after the author’s death (US302a)		Duration of copyright in US
	Note	1) Joint Works: In the case of a joint work prepared by two or more authors who did not work for hire, the copyright endures for a term consisting of the life of the last surviving author and 70 years after such last surviving author’s death. 2) Anonymous Works, Pseudonymous Works, and Works Made for Hire.—In the case of an anonymous work, a pseudonymous work, or a work made for hire, the copyright endures for a term of 95 years from the year of its first publication, or a term of 120 years from the year of its creation, whichever expires first (US302b, c)	Duration of copyright in US Joint works Anonymous , Pseudonym ous and works made for Hire
How much can be copied? (Is there a limit?)	According to Fair Use (4 Factors) (US107)		Fair use
	Note	Reproduction for blind or other people with disabilities, it is not an infringement (US121).	Fair use for disabilities Exceptions and limitations of copyright
How is Economic Rights?	The exclusive rights for 1) to reproduce the copyrighted work in copies or phonorecords; (2) to prepare derivative works based upon the copyrighted work; (3) to distribute copies or phonorecords of the copyrighted work to the public by sale or other transfer of ownership, or by rental, lease, or lending; 4) in the case of sound recordings, to perform the copyrighted work publicly by means of a digital audio transmission (US106)		Economic rights
	Note	None	

How is Moral Rights?	Rights of certain authors to attribution and integrity (US106A)		Moral rights
	Note	to claim authorship of that work; to prevent the use of his or her name as the author of any work of visual art which he or she did not create; shall have the right to prevent the use of his or her name as the author of the work of visual art in the event of a distortion, mutilation, or other modification of the work which would be prejudicial to his or her honor or reputation; and so on (US106A)	Moral rights
Other provisions?	Infringement of Copyright in Works (US501)		Infringement of Copyright
	Note	Any person who wilfully infringes a copyright shall be punished as provided under section 2319 of title 18, if the infringement was committed: (A) for purposes of commercial advantage or private financial gain; (B) by the reproduction or distribution, including by electronic means, during any 180-day period, of 1 or more copies or phonorecords of 1 or more copyrighted works, which have a total retail value of more than \$1,000; or (C) by the distribution of a work being prepared for commercial distribution, by making it available on a computer network accessible to members of the public, if such person knew or should have known that the work was intended for commercial distribution (US506).	Performance guarantee Criminal and civil enforcement

Table 3. Analysis of the copyright laws of the selected countries based on the questions of WIPO and Crews, (2008) in copyright law of Australia

Copying of Works in Libraries Copying of Works in Libraries and Exceptions and limitations and Fair Use				
Sub-Questions		Concept/s		Categories
What can be copied?	Original literary, dramatic, musical and artistic works, sound recording or a cinematograph film. (AU31, 32)		Copyrighted works	
	Note	In order for copyright to subsist in a work it must be made by a resident or citizen of Australia, or made or first published in Australia, or has a specified connection with a country which is a member of a relevant international copyright treaty (AU184, 185, 248U, 248V).		Conditions for protection of the work
Who can copy?	Libraries, students, researchers, Parliamentarians (AU Division5, 48, 49, 50)		Non-profit institutions	
	Note	According to the exceptions, limitations and exemptions (Fair dealing)		Fair dealing
Purpose of the copy	The purpose of research or private study and that he will not use it for any other purpose. (AU49.1.b.i). Fair dealing for purpose of research or study; Criticism or review; reporting news; Judicial proceedings (AU Division 3, 40, 41, 42, 43; AU103C)		Fair dealing	
	Note	1) A fair dealing with a literary, dramatic, musical or artistic work, -or with an adaptation of a literary, dramatic or musical work, for the purpose of research or private study does not constitute an infringement -of the copyright in the work. (AU40). 2) A fair dealing with an audio-visual item does not constitute an infringement of the copyright in the item or in any work or other audio-visual item included in the item if it is for the purpose of research or study (AU103C. 1).		Fair dealing
Medium of copy?	Reproduction, Reproducing and communicating works by libraries or archives for other libraries or archives (Interlibrary Loan) (AU40, 50).		Authorized reproduction Fair dealing	

	The purpose of criticism or review, a fair dealing with an audio-visual item (AU103A)		
	Note	None	
What is the Duration of copyright in works?	1) For 70 years after the calendar year in which the work was first made public (AU Section 33) 2) For 70 years after the calendar year in which the work was first made public (AU Section 33)		Duration of copyright
	Note	For 1) a literary work (other than a computer program); or dramatic work; or a musical work; or an engraving; and the author of the work has died; and the work was not first made public before the author died; 2) the identity of the author of the work is not generally known at any time before the end of 70 years after the calendar year in which the work was first made public 3) A work first published under a pseudonym may only be protected for 70 years from the year of publication, rather than 70 years from the year of your death.	
How much can be copied? (Is there a limit?)	According to Fair Use (4 Factors)		Fair use
	Note	For electronic form: 1) The number of words copied does not exceed, in the aggregate, 10% of the number of words in the work; or 2) if the work is divided into chapters—the number of words copied exceeds, in the aggregate, 10% of the number of words in the work, but the reproduction contains only the whole or part of a single chapter of the work (AU Part II, A2). The reproduction could be made from another reproduction of the article or published work in the collection of the library or archives that was made without infringing copyright (Preservation). (AU49.2)	Fair use Authorized reproduction Exceptions and limitations of copyright
How is Economic Rights?	The exclusive right for in the case of a literary, deramatic or musical work, including: (i) to reproduce the work in a material form; (ii) to		Economic rights

	publish the work (iii) to perform the work in public; (iv) to communicate the work to the public; (vi) to make an adaptation of the work (AU31)		
	Note	None	
How is Moral Rights?	Division 4—Right of integrity of authorship of a work		Moral rights
	Note	In Division 4: (1). The author of a work has a right of integrity of authorship in respect of the work; (2) The author's right is the right not to have the work subjected to derogatory treatment; (3) The doing, in relation to the work, of anything that results in a material distortion of, the mutilation of, or a material alteration to, the work that is prejudicial to the author's honour or reputation; or; (4) The doing of anything else in relation to the work that is prejudicial to the author's honour or reputation. (4) For exercise of author's moral rights, If the author of a work dies, the author's moral rights (other than the right of integrity of authorship in respect of a cinematograph film) in respect of the work may be exercised and enforced by his or her legal personal representative. (5) A moral right in respect of a work is not transmissible by assignment, by will, or by devolution by operation of law. Of course, there are exceptions for cinematograph film; or a literary, dramatic, musical or artistic work as included in a cinematograph film and so on.	Moral rights
Other provision?	Infringement of Copyright in Works (Division 6)		Infringement of Copyright
	Note	- In Division 6; 1) A person infringes an author's right of attribution of authorship in respect of a work if the person does, or authorises the doing of; 2) a person infringes an author's right not to have authorship of a work falsely attributed if	Performance guarantee Criminal and civil enforcement

		<p>the person does an act of false attribution in respect of the work and so on.</p> <p>- An offence against subsection (1) is punishable on conviction by a fine of not more than 550 penalty units or imprisonment for not more than 5 years, or both: (1) A person commits an offence if: (a) the person makes an article, with the intention of: (i) selling it; or, (ii) letting it for hire; or, (iii) obtaining a commercial advantage or profit; and (b) the article is an infringing copy of a work or other subject-matter; and (c) copyright subsists in the work or other subject-matter when the article is made (AU Part V, Division 5, Subdivision C, 132AD).</p>	
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After a qualitative analysis of the laws, topics with similar concepts were placed in related categories (Table 1, 2 and 3) and formed different classes as follows: 47 similar categories in 6 categories of fair and non-profit use; economic rights, moral rights; duration of copyright; infringement of copyright (creator's rights) and performance guarantee (Table 4). Extracting the categories and classes formed in this section will form the proposed copyright framework for libraries.

Table 4. Classification of equivalent codes and extraction of main themes (Rules analysis)

Class	Similar categories
Fair use and Non-profit use	IR2; IR8a; IR8b; IR9; IR10; IR7a; IR11; IR7b; IR12; IR12a; IR13; IR8c; US102; US108, 110; US107; US302a; US302b, c; US121; AU31, 32; AU Division5, 48, 49, 50; AU49.1.b.i; AU Division 3, 40, 41, 42, 43; AU103C; AU40; AU103C. 1; AU40, 50; AU103A; AU Part II, A2; AU49.2
Economic rights	IR3; IR22; IR6; US106; AU31; AU184, 185, 248U, 248V
Moral rights	IR4; IR18; IR19; US106A; AU Division 4

Duration of copyright	IR12; IR12a; IR13; AU Section 33; US302a; US302b, c
Infringement of copyright	IR21-31; US501; AU Division 6
Performance guarantee	IR21-31; US506; AU Part V, Division 5, Subdivision C, 132AD
Total: 6	47

The laws of the countries recognize the economic and moral rights of the creators of works as significant categories. Consideration their rights, especially their moral rights, in the laws of countries indicates the importance and position of creators.

Other laws in Iran have also considered the reproduction of books and works. According to the Law on Translation and Reproduction of Books, Magazines, and Audio Works, passed on 16/12/1973, the reproduction of books and magazines in the same language and form in which they were printed, in order to sell them through offset printing or photography or similar ways is prohibited without the permission of the right holder. In the year 2000, another law to protect the rights of the creators of computer software was approved by the Islamic Consultative Assembly, according to which the economic rights of the creators of computer software are protected for a period of 30 years. Furthermore, according to Article 63 of the Electronic Commerce Law approved in the year 2003, which is related to the author's rights in electronic exchanges, authors have exclusive right to reproduce, perform and distribute (publish) the works protected by the law in the form of data message.

- How is copyright perceived and implemented at NLAI, NLA, and LC?

To answer the second question of the research, the portal, regulations and instructions of the National Libraries of Australia, the LC and the NLAI were analyzed in terms of copyright. These topics included: the method of access, the publication date of the works and the purpose of use (educational and research). The resulting analysis is described in the following table separately for the three libraries.

Table 5. Perception of copyright of information resources in the selected libraries (study and analysis of portals, regulations and instructions)

Categories	Examples of sentences	Name of the library
<p>Research purpose (NLA1); obtaining permission from the owner of the work (NLA1); Duration of copyright (NLA2, NLA11); Anonymous works (NLA4); Reproduction of old resources (NLA4); Reproduction from unpublished manuscript resources (NLA5); Reproduction of government documents (NLA6); Access to oral history and folklore resources (NLA7); Legal agreement with donors for unique manuscripts (NLA8); Copy one chapter or 10% (NLA9); Creation of copyright status field in bibliographic records (NLA10);</p> <p>Copyright status (NLA9); Fair use (NLA9); Moral rights infringement (NLA12, NLA15, NLA17); Moral</p>	<p>- If the work is used for research purposes and the creator of the work has died more than 50 years before. For resources that do not meet this criteria, written permission from the copyright holder is necessary (NLA1).</p> <p>- Access to various resources is based on copyright. The duration of copyright for literary, artistic and musical works in Australia, whether published or unpublished, is up to 70 years after the creator's death (NLA2).</p> <p>- The NLA has considered two terms of protection for the map. For maps published by a government publisher in 1955 or later, the copyright protection period is 50 years after the end of the last year of publication of the map. However, for maps published in 1955 or later by a non-government publisher, the copyright protection period is 70 years after the end of the publication year of the map. Yet, maps published in 1954 or before are free of copyright protection (NLA3).</p> <p>- According to Section 52 of the Australian Copyright Act, some old unpublished materials kept in the library collection can be reproduced provided that more than 50 years have passed since the author's death; or that the identity of the copyright owner is not known, or a notice is published in a government newspaper between 2 and 3 months before the publication of the work (NLA4).</p> <p>- In the NLA, libraries can make reproductions of unpublished manuscripts kept in their collections (NLA5).</p> <p>- Some resources are considered official manuscripts. They include the documents written by a government official. These documents can be reproduced by the library and access to the collection is also free. Researchers wishing to publish such documents must obtain permission from the Australian Government</p>	NLA

<p>rights (NLA13, NLA14, NLA15); Economic rights (NLA16); The permission of the copyright owner (NLA17); Copyright permission (NLA18, NLA19); Economic rights (NLA18); Access conditions (NLA19)</p>	<p>Press to reproduce the manuscript for publication as an article rather than to use it for publication as a book (NLA6).</p> <p>- As regards the resources of oral history and folklore, there exist different accesses: 1. Open access for research, personal reproduction and public use; 2. Open access for personal research and reproduction; Written permission is required for public use; 3. Written permission is required for open access for research, personal reproduction and public use and 4. Written permission for research use, personal reproduction and public use (NLA7).</p> <p>- For easier access, copying and publication of unique and rare resources and manuscripts, resource donors are asked to complete a legal agreement that specifies the agreed terms so that the user can use it for research or study and publish part of it as a book. The terms requested in the agreement include ownership, duration of protection, reproduction and distribution. The owner of the copy is the author or creator of the content or the legal heirs of the creator, and the donor of the copy is not necessarily the owner. In addition, the collections include letters, diaries and documents belonging to several owners (NLA8).</p> <p>-Once you find the item you are looking for in the catalogue, check the 'copyright status' tab in the catalogue record. If it says: 'Out of copyright' then YES, we can copy the whole item and send it to you by email or post; 'In copyright' there will be limits on what we can send. Generally, for items in copyright we can copy one chapter or 10% for research and study; Ask a Librarian if the catalogue record says 'Copyright undetermined' or place the request and we'll let you know if we cannot supply it. (NLA9).</p> <p>- In the catalog of the NLA, there is an item titled "Copyright Status". This tool determines the copyright status based on the registered information using the MARC standard. This status is considered an indicator and should not be relied upon for legal decisions. If the</p>	
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	<p>copyright information is unclear or inaccurate, the library should be contacted (NLA10).</p> <ul style="list-style-type: none"> - Until 1 January 2005, copyright generally lasted for the life of the relevant creator plus 50 years. There were various exceptions to this rule, including: where a work was not published, performed or broadcast during a creator's lifetime; and where something was published anonymously or under a pseudonym, and the identity of the creator couldn't reasonably be ascertained (NLA11). - Although creators can provide written consents to acts that would otherwise infringe their moral rights. Furthermore, there are defenses to moral rights infringement, for instance, where the infringing act is reasonable in all the circumstances (NLA12). - Acknowledging the NLA as the source and citing rare and unique material accurately: ensures that the moral rights of the creator are acknowledged and allows others to follow your research path; saves time for anybody looking for the same item in future (NLA13). - Moral rights should always be considered if you are re-using and altering works (for example, through editing, cropping or colorizing) and you should ensure that attributions are clear and reasonably prominent (NLA14) - Moral rights generally last until the copyright in the work expires. Moral rights cannot be transferred or waived, although creators can provide written consents to acts that would otherwise infringe their moral rights (NLA15). - The copyright activities include copying and re-use, such as publication, performance, adaptation and communicating the work to the public (for example, by making it available online) (NLA16). - If you are not the owner of copyright, you risk infringing copyright if you perform one of these exclusive acts without obtaining the permission of the copyright owner. You must consider copyright when you obtain or create copies of items from the Library's collection to re-use them in some public way (NLA17). 	
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	<ul style="list-style-type: none"> - It is your responsibility to determine whether the work you want to copy or re-use requires copyright permission. Permission from the copyright owner may be necessary where: the material you wish to copy is protected by copyright; your copying is not insubstantial and your copying does not fall within an exception in the Copyright Act (NLA18). - If you wish to publish material from the Library's Oral History and Folklore Collection, you will need to declare your intention to the Library as custodian of the economic and if the interviewee has imposed any access conditions on their interview material you will need to declare your intention to the interviewee as well (NLA19). 	
Reproduction of works for the blind (LC1); Terms of use of works (LC2); Obtaining permission from the copyright holder (LC3); Tracking from the library for unauthorized accesses (LC3); Terms of purchase or license to access resources (LC4); Access to works prepared by staff (LC5); Concluding a contract with database publishers (LC6); Terms of access to databases (LC6); Suspension in case of violation of database	<ul style="list-style-type: none"> - The accessibility of works for the blind is such that authorized institutions are allowed to reproduce or distribute copies or audio files of previously published literary or musical works in accessible formats to be exclusively used by disabled people. This approval followed the 2018 amendment with the implementation of the Morocco Treaty. The provision of services to a qualified entity or individual in countries party to the Morocco Treaty is permitted (LC1). - The LC wants users to ask themselves a few questions about copyright in order to use the resources: Is the work subject to copyright? Do you have permission to use the work? Is the use of works considered a fair use of copyright for you? With this guide, the LC provides the user with a better understanding of the copyright status of the LC resources. The LC has attempted to state the terms of use in accordance with the Fair Use Regulations (LC2). - Access to resources that require more than fair use, for which it is necessary to obtain the permission of the copyright holder (owner of the work). - If the access to the resources in the library portal does not respect the copyright or is given without permission, the library must be contacted (LC3). 	LC

<p>conditions (LC6); Access to resources in the database in compliance with the conditions of fair use (LC6); Obtaining permission by the user to use licensed works (LC7); Conditions for using licensed works (LC7)</p> <p>Reproduction for private study, scholarship, or research (LC8); Determination of the scan by the librarian (LC9); determination of rights and access in bibliographic information (LC10); Public Access to the work with condition: Death of the author and 95 years have passed (LC11); 95 years from the year of its first publication, or a term of 120 years for Anonymous Works (LC12); Registration of copyright (LC13); infringement of copyright</p>	<p>- Resources received through purchase, donation and gift have additional or separate restrictions for use under the donation contract and conditions of purchase or licenses (LC4).</p> <p>- The works prepared by the library staff are not protected by copyright, because they are produced based on their duties and the library has no objection to international use and the like. Resources are made available online to the public under the following conditions: 1. The work is in the public domain or has no conventional (known) copyright restrictions; 2. If the library has a license for specific uses 3. If the provision of library resources falls within a copyright exception, it means that online access to it is specified by the library (LC5).</p> <p>- The LC has made it possible to enter into contracts with different publishers for thousands of electronic resources such as databases, electronic journals, full texts, abstracts, and the like) and in return for payment by the library, users will have access to these databases. In addition, the library also negotiates about how to use and who should use the resources. If the terms of the license are violated by the user, the licensors have the right to temporarily suspend or permanently revoke the access. Since licenses vary from publisher to publisher and from one work to another, to use an electronic resource, one needs to get the terms of the license and their use from the relevant database. If there is no license for a work, the provisions of fair use will be considered (LC6).</p> <p>- For works that require permission, permission is obtained by the user, and the user must consider the following points in relation to the owner of the work in order to obtain permission: Explain the work that requires permission; How long do you intend to use the work? Explain how you want to use the work; Explain about the context of using the work; And if you get a permission, be sure to stick to the terms of your request (LC7).</p>	
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<p>(LC13); statutory damages (LC13)</p> <p>Permission of owner (LC14); Economic rights (LC14); Use of public domain (LC15); permission of copyright holder (LC16); Economic rights (LC16); protection of moral rights (LC17); field 264 in MARC 21 (LC18); Protection of economic rights (LC18); Economic rights (LC19); Moral rights (LC19); Permission from the copyright owner (LC19); public domain of images (LC20); written confirmation for images (LC20); Access for educational and research purposes (LC21); Written permission of owner (LC21); fair use or other statutory exemptions (LC21); Rights and access (LC21); Moral rights (LC22); Infringement of moral right (LC22);</p>	<p>-The copyright law governs the making of photocopies or other reproductions of copyrighted material. Under certain conditions specified in the law, libraries and archives are authorized to furnish a photocopy or other reproduction. One of these specified conditions is that the photocopy or other reproduction is not to be "used for any purpose other than private study, scholarship, or research." If a user makes a request for, or later uses, a photocopy or reproduction for a purpose in excess of "fair use," that user may be liable for copyright infringement. All responsibility for use of the reproductions is assumed by the applicant (LC8).</p> <p>- In general, librarian determines whether material may be photographed or scanned without being damaged (LC9).</p> <p>- In the LC, there is a field titled <u>Rights and Access</u> for all the bibliographic information of the works. This field contains information about access to the source and related rights such as the owner of the work and the like (LC10).</p> <p>- In the LC, if the creator of the work has died and 95 years have passed from the publication, the libraries can make it available to the public (LC11).</p> <p>- Anonymous Works, Pseudonymous Works, and Works Made for Hire.—In the case of an anonymous work, a pseudonymous work, or a work made for hire, the copyright endures for a term of 95 years from the year of its first publication, or a term of 120 years from the year of its creation (LC12).</p> <p>- For certain types of works, registration of copyright may be a good idea because you get certain additional benefits. Registration establishes a public record, which is necessary if you need to sue someone in</p>	
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<p>Copyright infringement (LC23); Guarantee of criminal (LC23); Fair Use (LC24); four factor test (LC24); Ultimate determination of fair use by judge (LC24); Copyright infringement (LC25)</p>	<p>court for infringement. If you win your case, you may also be eligible for statutory damages and attorney's fees (LC13).</p> <ul style="list-style-type: none"> - The authorization of the creator is required for an item to be considered published. Examples of published material in P&P include: Prints by Currier & Ives, which were copyrighted and widely distributed in the late 19th century (LC14). - The public domain consists of works that are not protected by copyright law. Works may be in the public domain because their copyrights have expired, or they have been dedicated to the public domain by the rights holder, or they were ineligible for copyright protection in the first place. No permission is needed to copy public domain works; however, use of public domain works may nevertheless be restricted by licensing terms or by principles of privacy or publicity law <i>or other applicable law</i>. Works published in the U.S. prior to 1923 are in the public domain. U.S. Government works (prepared by federal employees in the scope of their employment) are not subject to copyright in the U.S. (LC15). - Transmission or reproduction of protected items beyond what is allowed by fair use or other exemptions requires written permission from the copyright holder (LC16). <p>If you are the copyright holder and believe library website have not properly attributed your work or have used it without permission, please contact ogc@loc.gov with your contact information and a link to the relevant content (LC17).</p> <ul style="list-style-type: none"> - In MARC 21 Format for Bibliographic Data, the field 264 contains a notice of protection under copyright or a similar regime. It included fields Production, Publication, Distribution, Manufacture and Copyright notice date. These are divisions similar to Economic rights (LC18). - For access to works, the user must determine whether a copyright permission is necessary. It is your responsibility to determine whether the work you want to copy or re-use requires 	
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	<p>copyright permission. Permission from the copyright owner may be necessary where: the material you wish to copy is protected by copyright; your copying is not insubstantial; your copying does not fall within an exception in the Copyright Act (LC19).</p> <ul style="list-style-type: none"> - Several of the books in the series contain photographs that have been copyrighted. The captions for these photographs clearly indicate the protected status of the images. All other text and graphics are in the public domain. Users and/or publishers requiring specific written confirmation for the record should direct inquiries to frds@loc.gov (LC20). - The LC is not aware of any U.S. copyright protection (see Title 17, U.S.C.) or other restrictions in the material in this collection, except as noted below. Users should keep in mind that the LC is providing access to these materials strictly for educational and research purposes. The written permission of the copyright owners is required for distribution, reproduction, or other use of protected items beyond that allowed by fair use or other statutory exemptions. Responsibility for making an independent legal assessment of an item and securing any necessary permissions ultimately rests with persons desiring to use the item(s) (LC21). - The user also has a responsibility to ensure that your copying or re-use of a work does not infringe moral rights. For instance, you should credit the work using the author(s) preferred form(s) of attribution. If the author is not known, then 'author unknown' is an appropriate description. 'Anonymous' should be used where the author intended not to be identified. In no circumstances should you credit the work to someone else or to yourself. You should not treat the work in a derogatory way (LC22). - In cases of copyright infringement, it is usual for the copyright owner to contact the alleged infringer to explain the nature of their complaint. Many disputes are resolved at this stage, and pointing to your good faith may help in such negotiations. However, if you do 	
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	<p>infringe copyright, the owner has the right to sue you, and a court may order a variety of remedies. Under current law, it is no defense to say that you did not know you were infringing copyright or that you used reasonable efforts to locate the copyright owner. That said, the Copyright Act also makes certain activities a criminal offence (LC23).</p> <p>- Common exceptions in library include Fair Use, as defined by USC, Title 17, Section 107 and the Fair Use Index. Be careful when relying on fair use. Fair use is a case-by-case four factor balancing test, and only a judge may make an ultimate determination on whether a particular use is a fair use. Other exceptions are for Libraries and Archives (See USC, Title 17, Section 108) and the First Sale Doctrine (See USC, Title 17, Section 109). Other exceptions and limitations are in USC Title 17, Sections 110 to 122 (LC24).</p> <p>- Clearly, one of the key pieces is educating people who use computers about copyright, she said. Librarians are also becoming publishers. All of the duties and responsibilities a publisher has to face, librarians have to also. That's a lot of work." Like publishers, when librarians decide to put information online, they must obtain electronic rights from authors, or risk being accused of infringement (LC25).</p>	
<p>Reproduction of 25% of the total pages of a book (NLAI1); Free reproduction of illustrated books for the blind (NLAI2); viewing some digital resources on site and digital hall (NLAI3); access to digital content according to Iran's copyright law (NLAI3); Duration of protection of 50</p>	<p>- To protect the author's and publisher's rights, it is possible to prepare scans from the books available in the NLAI up to 25% of the total pages of the book (NLAI1).</p> <p>- Illustrative books are reproduced for blind visitors free of charge (NLAI2).</p> <p>- In compliance with the intellectual property laws, a number of resources in the digital collections are available to member users only in the library and in the digital hall. Dissertations, recently published books and some documents are among these resources. Therefore, access to the content is based on the Law for the Protection of Authors, Composers and Artists Rights of 1970 (NLAI3).</p>	NLAI

<p>years for works (NLAI4); Lack of protection of manuscripts due to their obsolescence (NLAI5); Considering the duration of copyright of works (NLAI5); access to donated, loaned and endowed resources subject to the terms of the agreement (NLAI6); access to oral history resources (NLAI7); Prohibition of photocopying and reproduction of oral history resources (NLAI7); protection of economic rights (NLAI7); The conditions of anonymous and pseudonymous works are not stated in the copyright law of Iran 1970 (NLAI8); 50-year protection period for anonymous and pseudonymous works in the draft bill for the protection of literary and artistic property and related rights in</p>	<p>According to the law, the duration of copyright in the NLAI is considered to be 50 years after the death of the author (NLAI4).</p> <ul style="list-style-type: none"> - Information and images of all resources available in the manuscripts and rare resources, except for some valuable resources, are available to users according to the access level regulations. Almost all the resources available in the Department of Manuscripts and Rare Books are not subject to the copyright protection law, and these works are mostly related to previous generations. This is because, according to the amended Article 12 of 2010 of the Law for the Protection of Authors, Composers and Artists Rights approved in 1970, it encompasses the lifetime of the author plus 50 years after his/her death. Users can view all digitized resources through "Library and Digital Documents" and receive the source file through the Manuscript and Rare Books notification group. The provision of "special resources" through "digital libraries and documents" has specific regulations (NLAI5). - Notification regarding the resources of manuscripts given to the library through donation, loaning and endowment, if certain conditions are specified in the "loan agreement" and "deed of endowment", is subject to those conditions (NLAI6). - Access to oral history resources is like other resources, and the NLAI does not provide copies of oral history resources, and any photography of oral history resources is prohibited (NLAI7). - Regarding anonymous and pseudonymous works, the duration of protection in the draft bill for literary and artistic property and related rights in Iran is 50 years from the publication time; otherwise, it is 50 years from the work creation time. However, the Iranian copyright law of December 1970 has specified no terms and conditions for this (NLAI8). <p>It is possible to make a copy or scan of the resources according to specific rules and in compliance with copyright protection laws (NLAI9).</p>	
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Iran (NLAI8); Reproduction from resources according to the copyright law (NLAI9); Citing oral history resources and protecting the moral rights (NLAI10); Registration of works according to Iran's copyright law (NLAI11); Protecting moral rights in the use of old theses, maps, photos and images (NLAI12)	The applicant must make reference in the oral history resources used in his/her research in accordance with the accepted scientific methods (NLAI10). From the beginning of 2010 onwards, the registration of authored works is done by the Ministry of Culture and Islamic Guidance according to the Law for the Protection of Authors, Composers and Artists Rights (NLAI11). A large number of theses and maps have been digitized in the NLAI, and currently the digital hall inside the library should be used for viewing them. There are also a number of old photos and images that have been digitized in the library, and one should refer to the digital hall inside the library to view them (NLAI12).	
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Regarding the for-profit and non-profit nature of the services provided in the libraries, users have to pay a fee in all the investigated libraries for the interlibrary loan service. Apart from ordering books, they can also request the reproduction of articles from newspapers, magazines and books. Reproduction through scans, photos and photocopies of the resources available in the library is possible through payment of a fee. It is possible for users to have analog or digital images in accordance with the conditions of copyright, non-commercial use etc. However, receiving money for the reproduction of works in libraries, even if it is small, is considered profit from which the creator's share must be paid as well. Yet, if this amount is only for reproduction of the work, it is not considered as profit and income generation. In any case, the lawyers' views in this regard can help libraries. It is also necessary to note that providing services in all the investigated libraries was mentioned to be for educational and research purposes, a purpose mentioned as "fair use" of copyright. Therefore, non-profit use of resources requires a license and permission from the creator of the work.

After the portals were studied and analyzed, the regulations and

instructions of the libraries under investigation, the key classes resulting from the above analysis were obtained (Table 6). The combination of the main classes in the first research question and the key classes resulting from the analysis in Table 6 are used to provide the final proposed framework.

Table 6. Classification of equivalent codes and extraction of main themes (Analysis of portals and libraries regulations and instructions)

Class	Similar categories
Fair use and Non-profit use	NLA1, NLA4, NLA5, NLA6, NLA7, NLA9, LC1, LC5, LC6, LC9, LC15, LC20, LC 24, NLAI1, NLAI2, NLAI3, NLAI5, NLAI7
Duration of copyright	NLA2, NLA11, NLA4, LC11, LC12, NLAI4, NLAI5, NLAI8
License and Agreement	NLA1, NLA8, NLA17, LC2, LC3, LC4, LC6, LC7, LC16, LC19, LC20, NLAI6; NLA18, NLA19
Copyright policy	NLA9, NLA10, LC10, LC18, LC21
Moral rights	NLA13, NLA14, NLA15, LC17, LC19, LC22; NLAI10; NLAI11; NLAI12
Economic rights	NLA16, NLA18, NLA19, LC16, LC18, LC19; NLAI7; NLAI9
Infringement of copyright	LC13, LC22, LC23, LC25, NLA12, NLA15, NLA17
Total: 7	69

After analysis and coding, a total of 7 classes and 69 categories were obtained from primary and secondary coding and classes. The classes of fair and non-profit use, duration of copyright, license and agreement, copyright policy, moral rights, economic rights and infringement of copyright were the main classes that can be used to delineate the copyright of information resources in the NLAI.

- What framework can be proposed for copyright management of information resources at NLAI?

In the explanations of the first and second questions of the research, various topics for the copyright of information resources in libraries were mentioned. Fair and non-profit use, duration of copyright, license and agreement, copyright policy, moral rights, economic rights and infringement of copyright are as the main dimensions.

Also, 49 main components formed the proposed framework for the copyright of information resources for the NLAI. The libraries' attention to each of these components can help them, especially the NLAI, in developing the copyright policy of information resources (Fig 1).

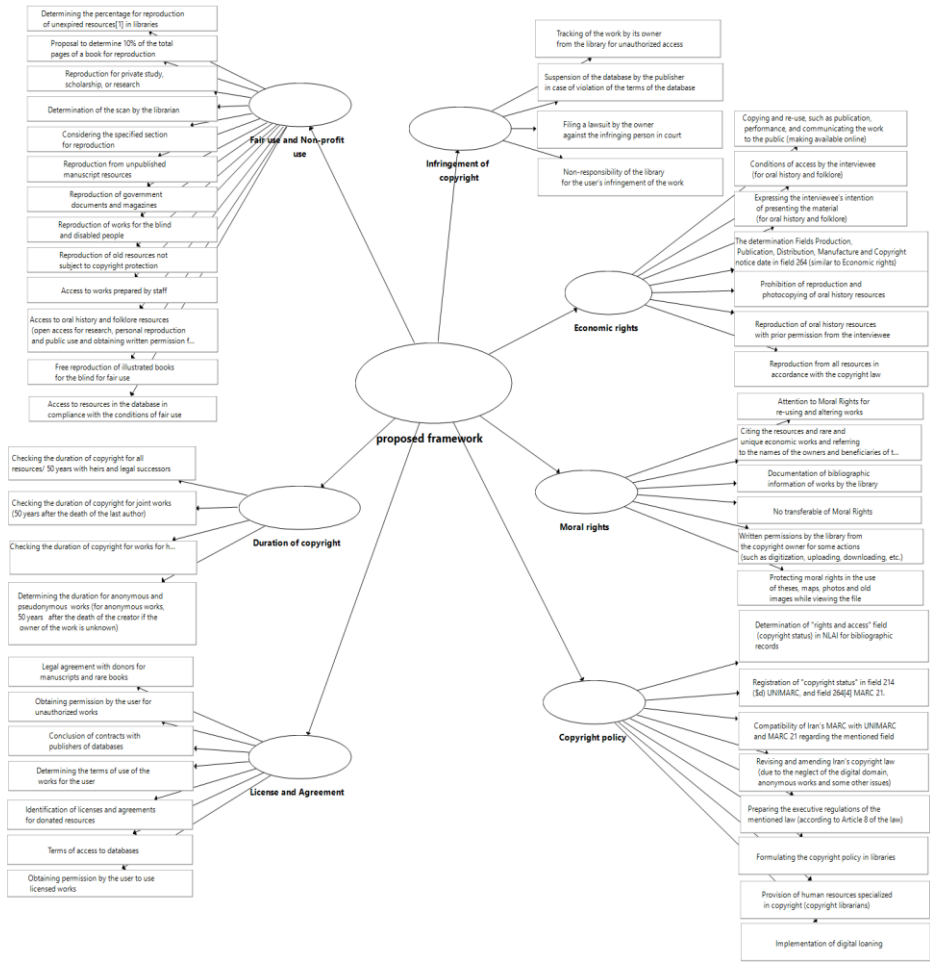


Figure 1. The preliminary proposed framework for the copyright of information resources for the NLAI

The framework is proposed based on the study of the copyright

laws of three countries and the study and analysis of the library of Congress and Australia. Also, as stated in the method section, the components of the proposed framework were sent to five experts in law and information science. Four experts were approved all the components and one expert suggested for corrections. For example:

The components of “access to works prepared by staff” and “Expressing the interviewee’s intention of presenting the material” were deleted. Also, in component “Prohibition of reproduction and photocopying of oral history resources” were replaced regulation words (Table7). Finally, after of the proposed correction 47 main components formed the proposed framework for the copyright of information resources for the NLAI.

Table 7. Final components in the proposed framework

Main components in Libraries	Framework Dimensions in laws
<ul style="list-style-type: none"> -Reproduction for private study, scholarship, or research - Determining the percentage for reproduction of unexpired resources¹ in libraries - Proposal to determine 10% of the total pages of a book for reproduction - Determination of the scan by the librarian - Considering the specified section for reproduction - Reproduction from unpublished manuscript resources - Reproduction of government documents and magazines - Reproduction of works for the blind and disabled people - Reproduction of old resources not subject to copyright protection - Access to oral history and folklore resources (open access for research, personal reproduction and public use and obtaining written permission for publication) - Free reproduction of illustrated books for the blind for fair use - Access to resources in the database in compliance with the conditions of fair use 	Fair use and Non-profit use
<ul style="list-style-type: none"> - Checking the duration of copyright for all resources/ 50 years with heirs and legal successors 	Duration of copyright

¹ . The period specified in the law has not yet passed.

<ul style="list-style-type: none"> - Checking the duration of copyright for joint works (50 years after the death of the last author) - Checking the duration of copyright for works for hire and photographic and cinematographic works (30 years from the date of release or publication) - Determining the duration for anonymous and pseudonymous works¹ (for anonymous works, 50 years after the death of the creator if the owner of the work is unknown) 	
<ul style="list-style-type: none"> - Legal agreement with donors for manuscripts and rare books - Conclusion of contracts with publishers of databases - Identification of licenses and agreements for donated resources - Terms of access to databases - Obtaining permission by the user for unauthorized works - Determining the terms of use of the works for the user - Obtaining permission by the user to use licensed works 	License and Agreement
<ul style="list-style-type: none"> - Determination of "rights and access" field (copyright status) in NLAI for bibliographic records - Registration of "copyright status" in field 214 (\$d)² UNIMARC, and field 264³ MARC 21. - Compatibility of Iran's MARC with UNIMARC and MARC 21 regarding the mentioned field - Revising and amending Iran's copyright law (due to the neglect of the digital domain, anonymous works and some other issues) - Preparing the executive regulations of the mentioned law (according to Article 8 of the law) - Formulating the copyright policy in libraries - Provision of human resources specialized in copyright (copyright librarians) - Implementation of digital loaning 	Copyright policy
<ul style="list-style-type: none"> - Attention to Moral Rights for re-using and altering works 	Moral rights

¹. The current law of Iran is silent in this regard. In the draft of Iran's Literary and Artistic Property bill, which is awaiting approval in the Islamic Consultative Assembly of Iran, a protection period of 50 years has been considered for it.

². This field contains statements relating to "Date of Publication, Production, Distribution or Manufacture or Copyright Notice" of a work.

³. This field refers to "Date of Publication, Production, Distribution or Manufacture or Copyright Notice of a work.

<ul style="list-style-type: none"> -Written permissions by the library from the copyright owner for some actions (such as digitization, uploading, downloading, etc.) - No transferable of Moral Rights - Citing the resources and rare and unique economic works and referring to the names of the owners and beneficiaries of the works - Documentation of bibliographic information of works by the library - Protecting moral rights in the use of theses, maps, photos and old images while viewing the file 	
<ul style="list-style-type: none"> -Copying and re-use, such as publication, performance, and communicating the work to the public (making available online) - Conditions of access by the interviewee (for oral history and folklore) - The determination Fields Production, Publication, Distribution, Manufacture and Copyright notice date in field 264 (similar to Economic rights) - Regulation of reproduction and photocopying of oral history resources - Reproduction of oral history resources with prior permission from the interviewee - Reproduction from all resources in accordance with the copyright law 	Economic rights
<ul style="list-style-type: none"> - Tracking of the work by its owner from the library for unauthorized access - Suspension of the database by the publisher in case of violation of the terms of the database - Filing a lawsuit by the owner against the infringing person in court -Non-responsibility of the library for the user's infringement of the work 	Infringement of copyright

Conclusion

This study aimed to analyze the copyright laws of Iran, Australia, and the U.S., and to analyze their library portals in order to provide a framework derived from a combination of the laws and practical policies of the studied libraries for implementation at the NLAI.

Regarding the existing copyright systems of the NLAI, NLA, and LC, an important distinction exists between the protection of an artist's economic and moral rights. This distinction highlights a fundamental divergence between the intellectual property rights systems in civil law countries and Common Law systems such as that of the U.S. (Holland,

2006). The three countries of Iran, the U.S., and Australia follow these two different legal regimes, namely the Romano-Germanic Legal System and Common Law.

Common Law countries have, to varying degrees, incorporated the protection of moral rights into their legislation. Australia and the U.S. formally accepted these rights in 2000 and 1990, respectively (Mirshamsi and Hamed, 2020). The Iranian legal system, conversely, follows the Romano-Germanic or Civil Law tradition, influenced particularly by the French system.

The analysis of the copyright laws and portals of the studied countries demonstrated that the issues of fair and non-profit use; economic rights; intellectual property rights; duration of copyright; infringement of copyright (creator's rights); performance guarantee; and license, agreement, and copyright policy constitute the core dimensions of a proposed copyright framework for library resources.

Fair and non-profit use is one critical dimension. To protect the rights of creators, users, libraries, and educational centers, legislators have included relevant articles in copyright laws, using phrases such as "conventional usage" in Iranian law. Implementing fair use in libraries encompasses topics such as: reproduction for private study, scholarship, or research; determining a permissible percentage for copying from protected resources (e.g., a proposal of 10% of a book's total pages); authorizing scans by librarians; reproducing unpublished manuscripts; copying government documents and magazines; reproducing works for the blind and disabled; providing access to old public domain resources; managing access to works created by staff; handling oral history and folklore resources (open access for research and personal use, requiring written permission for public release); and allowing free reproduction of illustrated books for the blind. This alignment with library exceptions and limitations, emphasized in Crews' (2008) WIPO-supported study, as well as in the work of EIFL (2009), Congleton and Yang (2017), and Yoon and Kim (2021), is consistent with the current findings.

The duration of copyright is another vital dimension for formulating a library copyright framework. Establishing clear terms of protection for all categories of works—including individual works, joint works, works made for hire, photographic and cinematic works, and anonymous or pseudonymous works—is essential for protecting creators' rights, even though these durations vary across countries. These findings are consistent with those of Electronic Information for Libraries (2009).

The research results also identified License and Agreement as a key requirement. This includes establishing legal agreements with donors of unique manuscripts, contracting with database publishers, identifying licenses for donated resources, defining database access terms, obtaining user permissions for protected works, determining terms of use, and ensuring users have permission to use licensed materials. This dimension is supported by studies from Electronic Information for Libraries (2009), Onoyeyan and Awe (2018), Ujing (2012), Schöpfel and Soukouya (2013), and Papi (2024).

According to the results, implementing copyright in libraries requires technical integration. Key components include:

- Creating a "rights and access" field (copyright status) in the NLAI's bibliographic records.
- Registering this information in field 214 (\$d) of UNIMARC and field 264 of MARC 21.
- Ensuring compatibility between IRANMARC and these international standards in the mentioned fields.
- Revising and amending Iran's copyright law to address gaps in digital content, anonymous works, and other issues.
- Preparing the executive regulations for the law (as stipulated by Article 8 of Iran's Copyright Law).
- Formulating a comprehensive copyright policy for libraries.
- Provisioning specialized human resources (e.g., a copyright librarian).
- Implementing digital trust mechanisms.

This policy dimension was emphasized by Abu Sirhan (2010), Onoyeyan and Awe (2018), Lear (2022), and Papi (2024).

Attention to moral and economic rights is of paramount importance in developing the copyright framework. Components related to moral rights include: securing written permissions from rights holders for actions like digitization and uploading; upholding the non-transferable nature of moral rights; ensuring proper citation and attribution for rare works; documenting bibliographic information thoroughly; and protecting moral rights in the use of theses, maps, photographs, and historical images. For economic rights, key components involve regulating copying, re-use, publication, performance, and online making available of works; setting conditions for access to oral history and folklore; respecting the intentions of interviewees; using field 264 to record production and copyright notice dates; prohibiting unauthorized reproduction of oral history; and ensuring all reproduction complies with the law.

Finally, libraries must have measures for copyright infringement. This dimension involves procedures for rights holders to report unauthorized access, potential suspension of database access by publishers for terms of use violations, legal action by the owner against an infringing user, and clarifying the library's non-liability for user infringement.

It should be acknowledged that differences exist in the copyright laws of different countries, with each nation tailoring its legislation to domestic conditions. However, examining the laws of other countries can effectively assist Iran in improving and developing its own copyright laws. This research aims to increase awareness among librarians, aid in developing copyright policy at the NLAI, and assist legislators in revising copyright laws regarding exceptions and limitations for libraries.

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