

A Comparative Analysis of Libraries' Approaches to Copyright: Israel, Russia, and the U.S.

by Pnina Shachaf and Ellen Rubenstein

While librarians are concerned about copyright and intellectual property, the extent of their compliance with ethical guidelines and copyright laws is unclear. This study examines, through content analysis, libraries' approaches toward copyright concerns in three countries (Israel, Russia, and the United States), and suggests a model of library response to social responsibility issues.

INTRODUCTION

Scholars suggest that the tension between creators (or owners) of information and the users of information is analogous to war.¹ For example, James Neal contends that "librarians must be at the frontline of the intellectual property wars," but he does not specify what role they should play in this war. Librarians can take an active role by joining creators/owners or users and engage in fighting. They can serve as moderators who promote peace or maintain cease-fire between each side. They can also play more passive roles by observing and reporting the war or by remaining uninvolved. Whatever the role of librarians is, it is clear that they should follow their ethical guidelines and comply with copyright laws. This study compares the extent to which libraries in three countries comply with their ethical guidelines and copyright laws.

While countries create and monitor intellectual property rights and desire international "copyright harmonization,"² comparative studies of library compliance with copyright laws and ethical guidelines are rare. This paper reports on a comparative analysis of institutional policies as they appear on the Web sites of academic libraries in Israel, Russia, and the United States. The three countries that are compared here were selected because they represent the few countries whose code of ethics included the principle of copyright and intellectual property.³ Specifically, this comparative analysis identifies the differences and similarities in attitudes toward copyright issues among academic libraries in these three countries.

LITERATURE REVIEW

The literature about libraries' approaches to copyright is extensive, yet international or comparative studies are scarce. A search of Library and Information Science Abstracts (LISA) between 1977 and 2005 identified more articles about copyright issues in the United States than any other country. Of the articles found, 42 percent were about the United States; 20 percent represented other Anglo countries, such as the United Kingdom, Australia, and Canada; and the remaining were about individual countries, such as Germany, Japan, and others. We found only one article on copyright and libraries in Israel (in Hebrew) and one about Russia (in Russian).⁴ Moreover, there is only one study comparing the copyright concerns of libraries in the Commonwealth of Independent States.⁵ The following review of the literature focuses on articles discussing academic librarians' understanding of copyright issues, their policies and activities in Israel, the United States, and Russia. Due to the lack of relevant materials about

copyright issues and academic libraries in Israel and Russia, these sections are very limited in scope compared with the United States.

United States

Academic libraries in the United States have been concerned with copyright issues since the passage of the Copyright Act of 1976, which revised standards of fair use and reproduction. Because the law was unclear from the start, multiple interpretations during its first few years contributed to confusion about photocopying permissions and about reserve readings in particular.⁶ For instance, although librarians were encouraged to consult the National Commission on New Technological Uses of Copyrighted Works (CONTU), out of twenty-seven institutions surveyed in 1978, only fifteen interpreted the guidelines to apply to reserve photocopying, and ten discounted them altogether.⁷ In 2002, Bonner et al. reported results of a survey of seventy-nine regional academic institutions and found that 52 percent had campus-wide intellectual property policies, 29 percent had no policies, and 41.2 percent had inadequate policies.⁸ Sixteen years after the 1976 Copyright Act was installed, they concluded that “defining copyright ownership rights remains an unresolved issue.”⁹

Interpretation of copyright laws turned out to be even more complex as information in electronic formats became more available.¹⁰ One of the new challenges was the circulation and copying of software. For example, this confusion was reported in 1984 by David B. Walch, who found that library practices in guarding against inappropriate copying of software were varied. Out of 293 academic institutions, 13 percent were circulating software and several more were planning to do so.¹¹ Confusion over this issue was addressed in 1990 when the Copyright Act was amended to allow libraries to circulate software as long as a copyright notice was attached. Librarians were now facing a new major challenge of addressing copyright issues when providing e-reserves services. Donna L. Ferrullo stated in 2004 that, in terms of e-reserves, there remains “no clear cut copyright policy and so many librarians are reluctant to undertake the risk of liability of having their university sued for copyright infringement.”¹² Along these lines, a 2005 report of a survey of the member institutions of the American Research Library Association found variations in reproduction limits, ranging from 10 percent of a work to only one chapter.¹³ Also, they found that only thirteen universities had specific committees addressing copyright issues, and 44.4 percent of the existing committees did not include library representation.

Moreover, recent articles have emphasized that the courts have not provided adequate guidance for university libraries and have recommended that librarians remain knowledgeable about the law, obtain appropriate permissions, and write disclaimers as a way to “avoid misunderstandings.”¹⁴ Gould et al. suggested increasing librarians’ activities to include postings on Web sites, informational sessions, handbooks, etc., with there being ways, such as check boxes, for users to respond that they are aware of such guidelines and the consequences of infringement.¹⁵ They also indicated that having a central authority to prepare guidelines rather than libraries working on their own would provide institution-wide consistency. Yet, it is unclear whether and to what extent academic libraries are following these suggestions.

In summary, most of the articles about copyright in the United States report a state of confusion surrounding libraries’ interpretations of the American 1976 Copyright Act, in particular about issues of fair use, photocopies, and e-reserves.

Russia

Janice T. Pilch reported that the legal system in Russia has been through a major transformation and its copyright law was adopted in 1994 (eighteen years after the American Copyright Act inception in the U.S.).¹⁶ In Russia, during most of the 20th century public interest was considered to be more important than private interest, and Commonwealth of Independent States (CIS) laws are not as broad in their interpretations of fair use as the United States. However, Russia incorporates the Berne provisions for libraries, archives, and educational institutions concerning the copying of materials for users.¹⁷ We were unable to find a single source that discusses libraries' attitudes and librarians' understanding of Russian copyright law.

Israel

Similar to Russia, the Israeli academic libraries' perspective on copyright is not extensively documented. Debbie Rabina states that contemporary copyright law in Israel is based on the 1911 British copyright law, which was revised throughout the years, but involves many contradictions and inconsistencies.¹⁸ She claims that copyright protection in Israel lags behind that of most European countries and the United States. Israeli libraries and librarians' attitudes toward copyright issues are not reported in the literature.

In summary, while there is little documentation about Russian and Israeli libraries' attitudes toward copyright and intellectual property, the literature on American libraries' attitudes documents a sense of an increased confusion surrounding the interpretation of the 1976 Copyright Act. This study aims to examine the differences and similarities in libraries' attitudes toward intellectual property and their compliance with copyright laws.

METHOD

In order to compare the extent of libraries' compliance with ethical guidelines and copyright laws, content analysis of copyright policies stated on library Web sites is applied, comparing and contrasting academic libraries from Israel, Russia, and the United States. Librarians' approaches to intellectual property can be examined at three levels of analysis: library association, library institution, or the individual librarian. This study focuses at the library level; the unit of analysis is, therefore, a library. Assuming that a library Web site is a representation of the activities of a library, analysis of university library Web sites is conducted; one central library per institution is analyzed.

The sample of countries is based on Shachaf's study that analyzed library associations' codes of ethics from twenty-eight countries and reported that only eight of them addressed copyright or intellectual property as an ethical principle.¹⁹ Since these countries, for one reason or another, included their ethical values regarding copyright in their code of ethics, it is more likely that libraries in these countries would include information about copyright, intellectual property, and fair use on their Web sites. A comparative analysis of library Web sites from these countries is conducted in order to explore how libraries approach copyright policies and clarify their espoused social responsibility about copyright and intellectual property.

The eight countries that addressed the ethical principle of copyright and intellectual property in their code of ethics are: Armenia, Australia, Croatia, Estonia, Israel, Lithuania, Russia, and the

United States. The relevant quotes from these codes for each of these countries are presented in [Table 1](#).

We examined how these countries could be clustered together and sampled one country from each cluster.²⁰ Among the eight countries that addressed copyright in their library association code of ethics, we identified three clusters: the Anglo-American countries, with representation of Australia and the United States; the Eastern European countries, represented by Armenia, Croatia, Estonia, Lithuania, and Russia; and Israel.²¹ We also examined the appearance of copyright as an ethical principle in these countries in relation to their corruption level. We expected that countries with higher levels of corruption would not have a code of ethics and if they did, they would be less likely to include copyright as an ethical concern. Using the Corruption Perception Index (CPI) 2004, we examined this claim and reviewed the ranks of the countries.²² The CPI ranks countries according to the scores of perceived corruption given by business people and country analysts. On a scale of 1–145, the most corrupt country is ranked the lowest (145) and the least corrupt country is ranked at the top (1) of the index. Based on the corruption index, countries from the Anglo-American cluster were ranked 1–20. Forty percent of the countries in this range had a code of ethics, and 10 percent included in their code of ethics an indication of copyright and intellectual property as an ethical principle. Israel was ranked in the range of 21–30; 40 percent of the countries in this range had a code of ethics and 10 percent included copyright and intellectual property as an ethical principle. The Eastern European countries were ranked 31–145. In this range, only eight percent of the countries had a code of ethics and only three percent of them addressed copyright and intellectual property in their codes.

This study analyzes the Web sites of academic libraries in one country from each of the three clusters, Russia (East-European), United States (Anglo-American), and Israel. A sample list frame of academic libraries for each of these three countries was identified. The MALMAD's (Israel Center for Digital Information Services) list of universities for Israel was used.²³ Two lists were used for our sample from Russia—the RUSLANET's (Regional University and Science Library Advanced Network in the North-West of Russia) and the Libweb list for Russia, Ukraine, and Eastern Europe.²⁴ The ARL (Association of Research Libraries) members list was utilized for the United States.²⁵

A sample of academic libraries was drawn from the list frames for each of these three countries. This included all the university libraries in Israel, all the Russian libraries on the two lists, and the first 50 libraries on the ARL list.²⁶ The sample of library Web sites involved a total of 117 library Web sites (Appendix A): fifty library Web sites from the United States, ²⁷ sixty library Web sites from Russia, and seven library Web sites from Israel.

Table 1
Copyright and Intellectual Property Text in Library Associations' Code of Ethics

<i>Country</i>	<i>Text</i>	<i>Context</i>
Armenia	The librarian: . . . 5. Respects and preserves the copyright and intellectual property rights.	One of ten provisions.
Australia	Librarians and library technicians: . . . 3. Must recognize and respect intellectual property rights and in compiling information for clients must avoid manipulation of information likely to mislead.	One out of eight provisions.
Croatia	The Croatian Library Association calls upon library staff to follow the principles stated in the Code: . . . 5. Respect for copyright.	One of seven provisions.
Estonia	. . . and we protect intellectual property rights. We follow the laws, agreements and standards applying to our professional work.	Second part of the fourth provision out of nine provisions.
Israel	Copyright (Heading) The librarian will respect all copyright laws.	The last subheading out of seven subheadings.
Lithuania	. . . A librarian respects copyright and treats the intellectual property according to legal rules.	Second part of the second provision out of seven provisions.
Russia	In his/her professional activity a Russian Librarian: . . . admits copyright to intellectual property;	The seventh of eleven provisions.
United States	We recognize and respect intellectual property rights.	The fourth out of eight provisions.

During September and October 2005, all library Web sites were visited in order to identify information about copyright, intellectual property, and fair use.

First, the visibility of the relevant information was assessed. Visibility of the information refers to availability of information on the library Web site and ease of access to this information. The visibility of the information was identified by answering two questions:

1. Is information about copyright, intellectual property available? [Yes, no];
2. How visible is the information on the library Web site? [How many clicks from the homepage it takes to get the information].

Next, content analysis of the Web site was conducted. The amount of information that the library Web site provides, the context of the information provided, and the specific activities that librarians are engaged in were identified. The following categories were formed: amount, context, and activities. For each of these categories, the following questions were

answered respectively:

1. Amount—How much information is available? [Number of words on the Web site, number of pages devoted for copyright, and number of internal and external links];
2. Context—What is the institutional context of the information? [Which library departments are involved in the provision of copyright information?];
3. Activities—What activities are evident? [Is the library responsible to monitor development? Does the library organizational structure reflects copyright activities (e.g., copyright librarian or copyright committee)? What is the purpose of the information about copyright (informing, educating, or warning users)?].

Web site coding was conducted on the English versions of each Web site and ten percent of the Web sites were coded by a second coder to assure coding reliability. Inter-coder reliability resulted in 93.75 percent between the two coders.

FINDINGS AND DISCUSSION

Visibility

We examined the visibility (availability of copyright information and the visibility of the information on the library Web site), the amount (how much information is provided, number of pages, number of words, and number of links), context (in what context the library provides the information), and activities.

The visibility of the copyright information on a library Web site indicates the importance of this information to the library. In libraries where librarians perceive copyright information to be more important, they will make this information easily available to their users in one of the most visible levels of their Web sites. On these libraries' Web sites, the user will not spend time following multiple links; a lower number of clicks will lead the user to the relevant information.

An examination of the sample of academic libraries in these three countries revealed that none of the libraries in Russia made reference to copyright or intellectual property on their Web sites. The Israeli libraries mentioned it on 70 percent of their Web sites, and the American libraries mentioned it on 90 percent of their Web sites. The fact that the Russian universities made no reference to copyright or intellectual property on their Web sites should be explained. The first possible explanation relies on cultural differences between Russia and the United States. Trompenaars and Hampden–Turner have proposed that countries differ from each other on several dimensions; one of these dimensions reflects the differences among countries with regard to relationships vs. rules and regulations.²⁸ They found that the United States ranks high on Universalism, while Russia ranks high on Particularism, at the other end of the scale. In Universalist countries (like the United States), one is expected to follow the rules under all conditions and to “play by the rules.” However, in Particularist countries (like Russia), one is expected to make exceptions to the rules based on specific contingencies. Another possible explanation is based on the tendency to disobey the law in Russia, attributed to the lack of supply of laws and lack of demand for law.²⁹ Yet, these two possible explanations should result in similar actions by both library associations (code of ethics) and libraries (Web sites) in Russia.

Nonetheless, in Russia, the code of ethics dedicates a sentence to intellectual property and copyright, while library Web sites did not provide copyright information. Thus, this inconsistency requires a different explanation.

The Russian code of ethics specifies: “In his/her professional activity a Russian Librarian: . . . admits copyright to intellectual property.” (This is an exact quote from the original text.) Julia P. Melentieva, a Russian librarian who was involved in editing the Russian code of ethics, describes: “It was very important to explain to the Russian library public the code principle of admission of copyright to intellectual property. That meant that a library should not use unlicensed products (for example, pirated cassettes and CDs) in its work, which is highly urgent for the current situation in our country. This principle also prevents a library from acquiring documents with infringements of their owners’ rights.” (This is an exact quote from the original text).³⁰

The explanation of the fact that the Russian code of ethics refers to copyright and intellectual property and the libraries did not mention it is that Russian libraries are using unlicensed materials and are purchasing infringed copyright materials. While the professional association provides guidelines, the libraries not only do not take social responsibility over this issue, but they need to be informed, educated, and warned by the professional association to change their behaviors and policies.

Since none of the libraries in Russia had references to copyright or intellectual property on their Web sites, the following findings and analysis focus on the other two countries, Israel and the United States.

Table 2
Visibility of Copyright Policy Information

Number of clicks to get to copyright information	# of libraries— U.S.	# of libraries— Israel
One click	4	5
Two clicks	31	0
Three clicks	7	0
Four clicks	2	0
No information	6	2
Total	50	7

Table 2 provides the count of the number of clicks on Israeli and American Web sites. The percentage of the libraries in each country that provide information on copyright on their Web site at each of the visibility levels (the number of clicks it takes to get to the copyright information from the libraries homepage) is illustrated in Fig. 1. The findings indicate that in Israel information about copyright is provided in one click in more than 70 percent of the institutions and in the United States it is provided in one click only by 9 percent of the

institutions. Yet, in the United States more than 90 percent of the institutions provide some information on copyright and intellectual property on their Web site and in Israel a little more than 70 percent of the libraries do so.

Library Web sites in Israel provide some information at a more visible location, indicating the importance of copyright information for librarians in this country. This finding is in line with the fact that the code of ethics from Israel was the only one (among the eight countries) that emphasized this ethical principle by devoting a subheading for copyright, while the other countries only mentioned copyright and intellectual property in a sentence. However, the importance of copyright to librarians in a specific country is also indicated by the amount of information that is devoted to it on library Web sites, not only by its visibility.

Amount

The amount of information that is provided on the library Web site was measured. Four measures were developed; these include the average number of words, average number of pages, average number of internal links, and average number of external links. [Fig. 2](#) illustrates the differences among the countries in the amount of information that libraries provide on their Web sites about copyright. We made the assumption that the amount of information indicates not only the importance of the information to the librarians, but also the amount of time libraries devote to creating this information. Thus, it is an indication of the efforts that the libraries are making to educate and inform their users about copyright issues. The findings indicate that the amount on all of these measures is larger on American libraries' Web sites compared with the Israeli libraries' Web sites: (1) the average number of words on Israeli Web sites is seven and on the American Web sites is thirty-nine; (2) the number of pages an academic library Web site in the United States devotes to copyright and intellectual property information is 1.85 pages, while in Israel the average is 1 page; (3) both the number of internal links and the number of external links from the Web sites with information about copyright are higher for American Web sites than for Israeli Web sites (2.6 vs. 0 internal links respectively, and 1.85 vs. 0.2 for external links respectively).

Figure 1: Number of Clicks to Get to Copyright Information

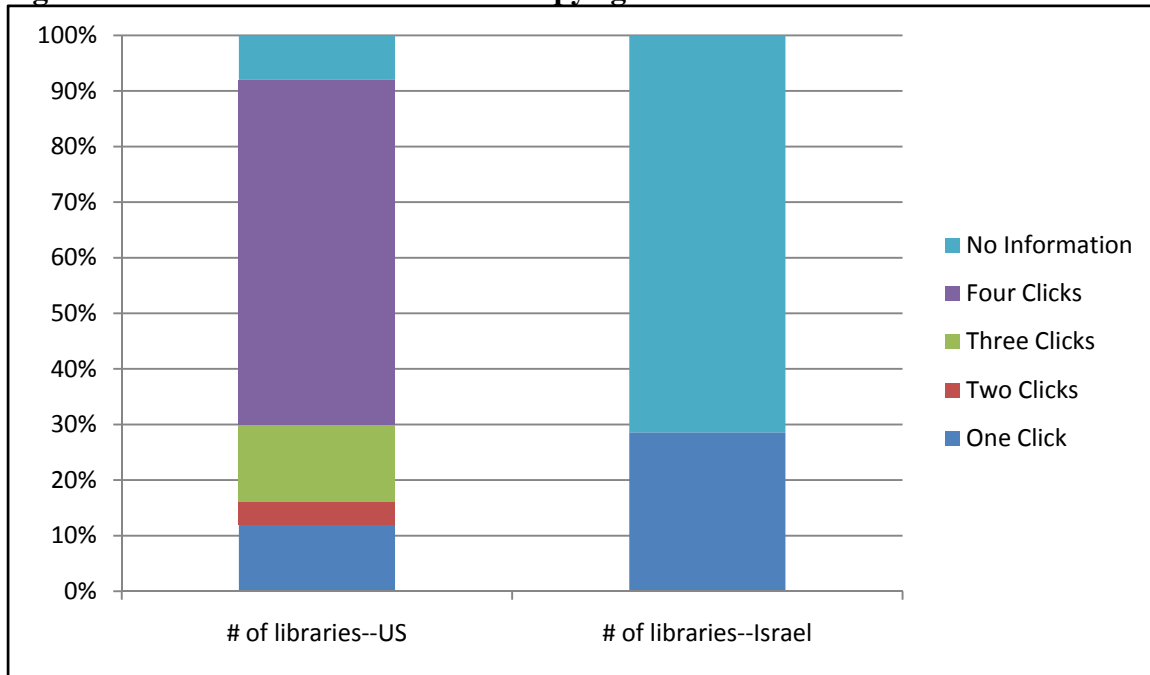
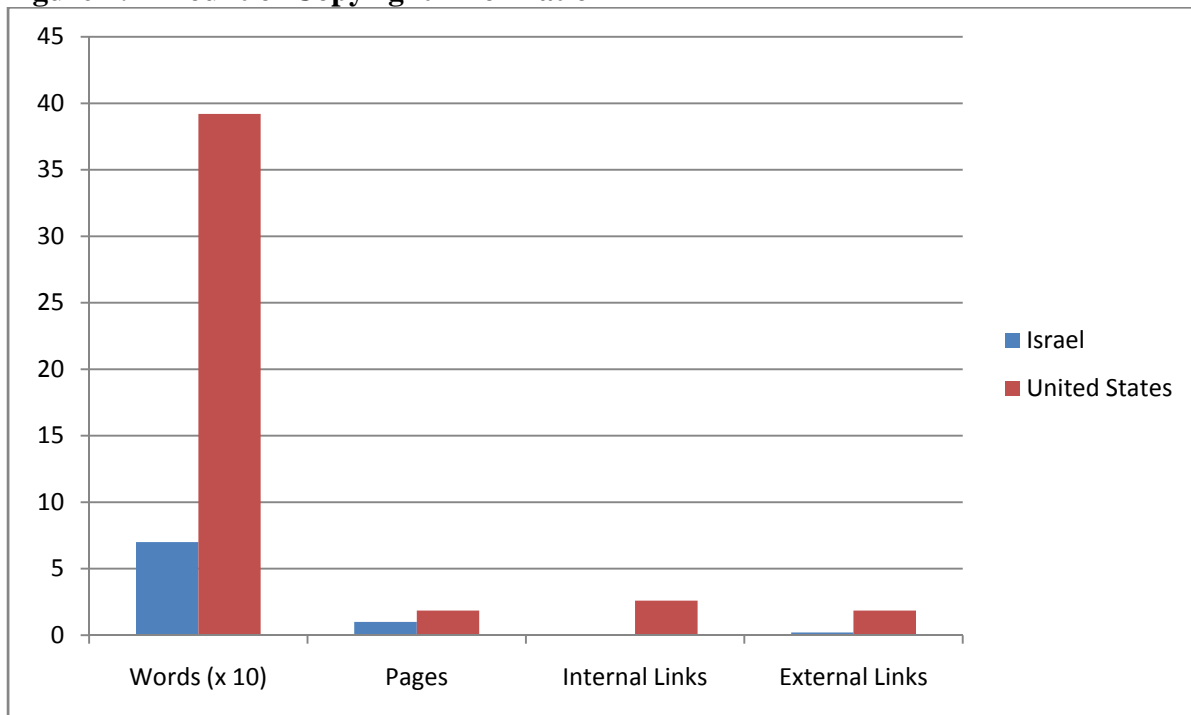


Figure 2: Amount of Copyright Information



American libraries devoted more time and effort providing copyright information than libraries in Israel. Their Web sites devoted more pages, more words, and more links related to copyright than libraries Web sites in Israel.

Organizational Context

The organizational context of the information is another dimension that was examined in order to better understand the type of activities that libraries are engaged in, as well as the reasons to provide copyright information. The context is an indication of the implied purpose of the information as well as the function of the library that is most concerned about copyright and intellectual property.

Figure 3: Where is the information?

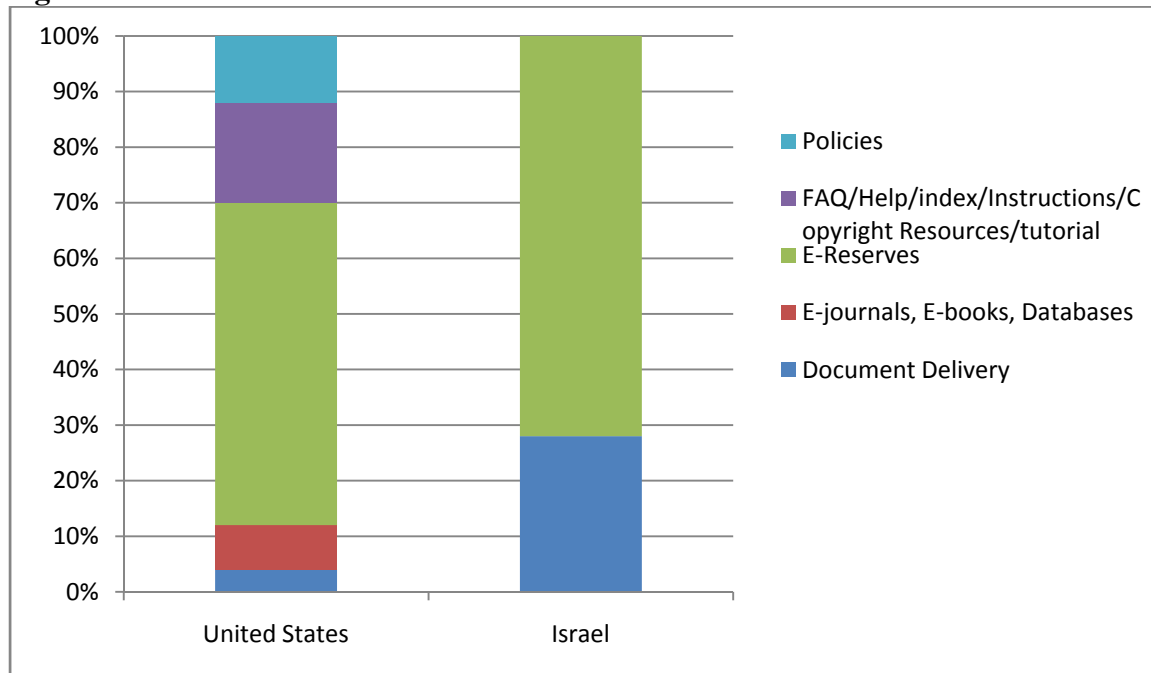


Fig. 3 describes the differences between Israel and the United States in terms of the context of the information. More than 70 percent of the libraries in Israel provided copyright information related to e-journals, and 30 percent to e-reserves, while in the United States less than 10 percent of the libraries mentioned it under e-journals and 60 percent were related to e-reserves. In addition, in the United States, many other locations were evident; among them are FAQ with almost 20 percent of the libraries.

In the United States, most of the instances were related to e-reserves and in Israel most of the instances related to e-journals. However, in both countries, the information is associated with the electronic format of the materials.

Activities

If a library is engaged in social action in regard to copyright and intellectual property, it might be reflected in its organizational structure. A library that as part of its resource allocation establishes a position dedicated to copyright and intellectual property, a title of an individual librarian (e.g., copyright librarian), or a committee (e.g., copyright committee) assumes copyright responsibility. We identified indications of these kinds of resource allocation that indicate library commitment to copyright and intellectual property. While 15 percent of the American libraries

mentioned a copyright librarian or copyright committee, none of the library Web sites in Israel mentioned such positions.

A commitment of the library to monitor developments in copyright law is another library activity that libraries' pages on copyright and intellectual property addressed. While 15 percent of the American libraries commit to monitoring the developments in copyright law and fair use, none of the libraries in Israel indicated this type of library commitment on their Web sites.

Both of these activities, copyright librarian and monitoring copyright developments, that are evident in the United States but not in the other two countries demonstrate that American libraries are engaged in more copyright activities than libraries in either of the other two countries.

Furthermore, the purpose for providing the copyright information on libraries' Web sites varied as well. Three purposes were identified from the content analysis of the copyright pages: to inform, educate, or warn users about copyright restrictions. The majority of the libraries in the United States (60 percent) provided information in order to educate users about copyright and fair use, by providing information along with explanations of the information. Unlike the educational attitude of the American libraries, in Israel none of the libraries attempted to educate users about copyright. Further, libraries in both countries provided information to inform users of their policies, but more American libraries (40 percent) than Israeli libraries (20 percent) did it for that purpose. Libraries in Israel mostly provided the information when they were warning their users to avoid collective punishments; they warn their users that if they do not comply with vendors' terms of use, access to their institution will be restricted. Eighty percent of Israeli libraries warned their users, and none of the American libraries did. Thus, the purpose of the information that is available on the library Web sites is quite different from one country to another indicating different foci of the law as well as different library activities in regard to copyright.

These different activities in the three countries reflect different libraries' attitudes toward their social responsibility.

Figure 4
Total Corporate Social Responsibility



The three types of copyright activities, which were mentioned on the libraries' Web sites, clearly indicate that libraries in the United States are engaged in more activities (variety of activities) than those in Israel (or Russia) and assume more social responsibility over this issue. American libraries take a preventive attitude compared with the more defensive attitude of the Israeli libraries. Russian libraries, as was mentioned before, had no information on their Web sites and do not reflect social responsibility of the libraries over copyright concerns. It is also possible that these variations reflect different legal sanctions and variations in legal systems among the three countries. Yet libraries act differently in these three countries.

Libraries, like other organizations, vary on the level of social responsibility that they assume. These levels of social responsibility toward stakeholders that were developed in the context of the corporate world correspond to the four levels of an organization's response to social responsibilities (Fig. 4).³¹ Libraries in the three countries exhibit different levels of response to their social responsibility. The scale of response actions that organizations, and libraries alike, use when a social issue confronts them is composed of four levels.³² At the lowest level of the scale, obstructive level, a library ignores the issue and does not assume social responsibility over copyright. Next, at the second-lowest level, defensive level, a library does only what is legally required. At the third level, accommodative level, a library accepts ethical responsibility over copyright concerns. Finally, at the fourth and highest level, proactive level, a library takes initiative. The comparison among the libraries in the three countries suggests that Russian libraries are at the obstructive level, Israeli libraries are at the defensive level, and American libraries are at the accommodative level.

CONCLUSIONS

How do librarians approach copyright and intellectual property concerns? It depends. This analysis clearly indicates that the levels of emphasis are different among the libraries of the three clusters of countries, and there is no consensus at all as to their responsibility over copyright and intellectual property issues. One approach that is common across all three countries is to be passive and reactive.

In analyzing academic library Web sites from three countries, the United States, Israel, and Russia, this study's goal was to determine libraries' approaches to copyright issues and to identify what level of responsibility librarians are taking with copyright and intellectual property issues. It was determined that these countries exhibited divergent values and attitudes toward copyright responsibilities.

More American libraries mentioned copyright on their Web sites than Israeli libraries, while Russian academic libraries had no copyright information on their Web sites. Further, American libraries reported on more activities and efforts around this issue, such as a position of a copyright librarian, more information, and more educational activities, than Israel. These differences were indicative of the different levels of social responsibility that librarians in these three countries assume when concerned with copyright and intellectual property. Russian libraries assume only economic responsibility, Israeli libraries assume only legal responsibility, and American libraries assume ethical responsibility. Yet, none of the libraries that have been

examined in this study reached the discretionary and highest level of social responsibility. It is possible that the professional associations in these countries are assuming higher levels of social responsibility. This can only be determined in future studies.

While libraries' approaches to copyright and intellectual property can be understood as legal compliance or as an ethical concern in various countries of the world, we argue that in the three countries it is an ethical concern. For one reason, the appearance of intellectual property in the code of ethics indicates that the professional association considers it to be an ethical concern. It is possible that the professional code of ethics addresses copyright and intellectual property concerns only in countries where the law, for one reason or another, is not perceived to be sufficient by the librarians. It is in these countries that the issue becomes an ethical concern.

Compliance with copyright laws in a country is likely to reflect the general level of individuals' and organizations' (such as academic libraries) compliance with the laws in this country. For example, disobedience in Russia and Israel vs. a higher level of legal obedience in the United States may partially explain the differences in the espoused level of concern of libraries over copyright and intellectual property issues. Additionally, compliance with copyright laws in a country may reflect specific concerns that arise from the copyright law itself. For example, the confusion over the vague terms used in the fair use section of the United States Copyright Act is reflected by individual libraries' interpretations, which are provided for the public in length on American library Web sites. These differences among the countries may be further explained by political, social, technological, and economic factors.

The limitation of this study relies mainly in the assumption that library Web sites represent library attitudes and activities. For example, the extensive use of signage in the photocopy and printer areas to get the copyright message across is not captured and reported in our study. In addition, this study is limited due to the small number of countries that are compared excluding, for example, Asian countries and European countries. The focus on academic libraries in each country provides only one aspect of the concerns of libraries with copyright issues. Future studies should expand the number of countries, the type of libraries, and use different methods of data collection (e.g., interviews and surveys).

APPENDIX A

List of Libraries

Country	Institution	Library Web site
Israel	Bar Ilan University	http://www.biu.ac.il/lib/
	Ben-Gurion University of the Negev	http://www.bgu.ac.il/html/libraries.html
	Haifa University	http://lib.haifa.ac.il/
	Hebrew University of Jerusalem	http://www.huji.ac.il/huji/eng/library_e.htm
	Open University	http://www.openu.ac.il/Library/index.html
	Technion-Israel Institute of Technology	http://library.technion.ac.il/default-ENG.asp
	Tel Aviv University	http://www.tau.ac.il/libraries-eng.html

Russia	Altai Regional Universal Library named after V.Ya. Shishkov	http://arw.dcn-asu.ru/autors/partners/library/index.html
	Library of Kyrgyz-Turkish University "Manas"	http://www.manas.kg/library/library_eng.htm
	Chelyabinsk Regional Universal Scientific Library	http://libry.urc.ac.ru/eeee.html
	The Research Library of South Ural State University	http://www.ruslan.ru:8001/sng/chel/tu_chel.html
	Scientific Library of Chelyabinsk State University	http://www.csu.ac.ru/Faculties/libr/
	Science and Technology Library of Joint Institute for Nuclear Research	http://dbserv.jinr.ru/library/
	Library of the Urals State Technical University	http://www.ustu.ru/library/soder_eng.html
	Scientific library of the Ural State University	http://www.usu.ru/eng/usu/subdivisions/bibl.htm
	Library of the Irkutsk State Technical University	http://istu.edu.ru/english/library.html
	Library of Tupolev Kazan State Technical University (KAI)	http://www.kai.ru/kai/libr/main.en.html
	Russian National Public Library for Science and Technology	http://www.gpntb.ru/
	Library for Natural Sciences of Russian Academy of Sciences	http://www.benran.ru/
	M.I. Rudomino All-Russia State Library for Foreign Literature	http://www.libfl.ru/
	State Medical Library of Russia	http://www.scsml.rssi.ru/menu.html
	Central Scientific Agricultural Library	http://www.cnsnb.ru/csal/indengl.htm
	The Moscow M.V. Lomonosov State University Scientific Library	http://uwh.lib.msu.su/index_e.html
	Library of Moscow Power Engineering Institute	http://www.ruslan.ru:8001/sng/mos/ei_mos.html
	Science Library of Moscow State Engineering Physics Institute	http://library.mephi.ru/
	Library of Moscow State Aviation Institute	http://www.mai.ru:8080/dep/library/library.htm
	The National Scientific Versatile Library of the Nizhni Novgorod Oblast	http://www.nounb.sci-nnov.ru/

Novosibirsk State Regional Scientific Library	http://rstlib.nsc.ru/old/index.html
State Public Scientific Technological Library of the Siberian Branch of the Russian Academy of Sciences (SPSL SB RAS)	http://www.spsl.nsc.ru/eng/
Branch of SPSL SB RAS	http://www.prometeus.nsc.ru:8080/eng/
Library of Perm State University	http://www.psu.ru/english/library/index.html
Regional University Library of Rostov State University	http://www.rsu.ru/rsu/library.html
Zonal Scientific Library of Saratov State University named after N.G. Tschernyshevsky	http://www.ssu.runnet.ru/english/bibl2_.htm
Scientific Library of Tambov State Technical University	http://www.tstu.ru/eng/tgtu/lib.htm
Scientific-Technological Library of Tomsk Polytechnic University	http://www.tpu.ru/TPU/Eng/book/page100.html
Scientific Library of Tomsk State University	http://www.lib.tsu.ru:8100/win/English.htm
Tver Regional Universal Research Library named after A.M. Gorky	http://www.topl.tversu.ru/def_e.htm
Library of Bashkir State University	http://www.bashedu.ru/bibl/lib_e.htm
Library of Far Eastern State University	http://www.dvgu.ru/eng/fesu/struct/aux_org.htm#LIBRARY
Library of Vladivostok State University of Economics	http://www.vvsu.ru/LIBRARY/index.htm
The Scientific Library of Voronezh State University	http://www.vsu.ru/eng1/faculties/znb/znb.html
Byelorussian State University	http://www.bsu.by/main.asp?id1=12_and_id2=1201
Central Science Library	http://csl.bas-net.by/
Centralized Library System Kievskaya	http://www.cl.ru/
Chelyabinsk State University	http://www.lib.csu.ru/
Chizhevsky Regional Universal Research Library	http://www.library.online.kr.ua/
Kharkiv National University	http://www.univer.kharkov.ua/main/library/
Kharkiv State Scientific Korolenko Library	http://korolenko.kharkov.com/

Lesya Ukrainka Public Library	http://lucl.lucl.kiev.ua/
Library for Foreign Literature Moscow State University	http://www.libfl.ras.ru/
National Library of Belarus	http://www.lib.msu.su/
Russian Academy of Sciences- Library for Natural Sciences Russian Academy of Sciences- Siberian Branch	http://natlib.org.by/ http://www.benran.ru/ http://info.spsl.nsc.ru/
Russian National Public Library for Science and Technology	http://www.gpntb.ru/
Russian State Library	http://www.rsl.ru/
St. Petersburg State Technical University	http://www.unilib.neva.ru/
St. Petersburg State University of Economics and Finance	http://www.finec.ru/PARTS/library.htm
South Ural State University	http://www.lib.tu-chel.ac.ru/
State Public Historic Library	http://www.shpl.ru/
The National Library of Russia	http://www.nlr.ru/
Ukrainian Catholic University	http://library.ucu.edu.ua/
University of Kiev-Mohyla Academy	http://www.ukma.kiev.ua/ukmalib/
Uzhgorod National University	http://karpattour.narod.ru/lib1237.htm
Vernadsky National Library of Ukraine	http://www.nbu.gov.ua/
Vinnitsa State Regional Universal Scientific Library	http://www.library.vinnitsa.com/
United States University of Alabama Libraries	http://www.lib.ua.edu/
University of Arizona	http://dizzy.library.arizona.edu/
Arizona State University Libraries	http://www.asu.edu/lib/
Auburn University	http://www.lib.auburn.edu/
Boston College	http://www.bc.edu/libraries/
Boston University	http://www.bu.edu/library/
Boston Public Library	http://www.bpl.org/
Brigham Young University	http://www.lib.byu.edu/
University of British Columbia	http://www.library.ubc.ca/
Brown University	http://www.brown.edu/Facilities/University_Library/

University of California-Berkeley <http://infolib.berkeley.edu/>
University of California-Davis <http://www.lib.ucdavis.edu/>
University of California-Irvine <http://www.lib.uci.edu/>
University of California-Los Angeles <http://www.library.ucla.edu/>
University of California-Riverside <http://library.ucr.edu/>
University of California-San Diego <http://www.ucsd.edu/libraries/>
University of California-Santa Barbara <http://www.library.ucsb.edu/>
Case Western Reserve University <http://www.cwru.edu/uclibraries.html>
University of Chicago <http://www.lib.uchicago.edu/e/index.html>
University of Cincinnati Libraries <http://www.libraries.uc.edu/>
University of Colorado <http://www.colorado.edu/Academics/Libraries.html>

Colorado State University <http://lib.colostate.edu/>
Columbia University <http://www.columbia.edu/cu/lweb/>
University of Connecticut <http://www.lib.uconn.edu/>
Cornell University <http://campusgw.library.cornell.edu/>
Dartmouth College <http://diglib.dartmouth.edu/>
University of Delaware <http://www.lib.udel.edu/>
Duke University <http://www.lib.duke.edu/>
Emory University <http://www.emory.edu/LIBRARIES/>
University of Florida <http://www.uflib.ufl.edu/>
Florida State University Libraries <http://www.lib.fsu.edu/>
Georgetown University <http://gulib.lausun.georgetown.edu/>
George Washington University <http://www.gwu.edu/gelman/>
University of Georgia <http://scarlett.libs.uga.edu/>
Georgia Institute of Technology <http://www.library.gatech.edu/>
Harvard University <http://lib.harvard.edu/>
University of Hawaii <http://libweb.hawaii.edu/uhtmlib/index.htm>
University of Houston <http://info.lib.uh.edu/>
Howard University Libraries http://138.238.41.254/#_topFrame
University of Illinois-Chicago <http://www.uic.edu/depts/lib/>
University of Illinois-Urbana-Champaign <http://www.library.uiuc.edu/>

Indiana University	http://www.libraries.iub.edu/
University of Iowa	http://www.lib.uiowa.edu/
Iowa State University	http://www.lib.iastate.edu/
Johns Hopkins University	http://webapps.jhu.edu/jhuniverse/libraries/index.cfm
University of Kansas	http://www.lib.ku.edu/
Kent State University Libraries	http://www.library.kent.edu/
University of Kentucky	http://www.uky.edu/Libraries/
Louisiana State University	http://www.lib.lsu.edu/

NOTES AND REFERENCES

1. For example, James G. Neal, "Copyright is Dead . . . Long Live Copyright." *American Libraries* 33 (11) (December 2002): 48–51.
2. *Ibid.*, p. 48.
3. Pnina Shachaf, "A Global Perspective on Library Association Codes of Ethics." *Library and Information Science Research* 27 (December 2005): 513–533.
4. A search in LISA identified about 350 articles since 1977 on the topic. Of the other representative countries studied here, one was about Russia and one about Israel. To provide context, forty-five articles listed are from the U.K.; twenty-two from Australia; fifteen from Germany; thirteen from Japan; thirty-seven from a mix of Western European countries; seven from Eastern European countries (excluding Russia/USSR); five from India, four from Africa; four from Canada; one from the United Arab Emirates; one from New Zealand; one from Malaysia; one from Iceland; and fourteen from a mix of countries discussing global issues.
5. Janice T. Pilch, "Fair Use and Beyond: The Status of Copyright Limitations and Exceptions in the Commonwealth of Independent States," *College and Research Libraries* 65 (6) (November 2004):468–504.
6. Janice W. Holladay, "Educators/Copyright: The Academic Librarians' Viewpoint," *Journal of Chemical Information and Computer Sciences* 22 (2) (May 1982): 78–81; Charles Martell, "Copyright-One Year Later: A Symposium," *The Journal of Academic Librarianship* 5 (3) (July 1979): 124–131; Regina Shelton, "Adaptation: A One-Year Survey of Reserve Photocopying," *The Journal of Academic Librarianship* 6 (2) (1980): 74–76.
7. Meredith Butler, "Copyright and Reserve Books: What Libraries are Doing," *College and Research Libraries News* 39 (5) (May 1978): 125–129.
8. Kimberly Bonner, Kimberly B. Kelley, James S. McMichael, and Neal Pomea, "Intellectual Property, Ownership and Digital Course Materials: A Study of Intellectual Property Policies at Two and Four Year Colleges and Universities," *Portal: Libraries and the Academy* 2 (2) (Apr 2002): 255–266.
9. *Ibid.*, p. 264.

10. Karen I. Wagner, "Intellectual Property: Copyright Implications for Higher Education," *The Journal of Academic Librarianship* 24 (1) (January 1998): 11–19.
11. David B. Walch, "The Circulation of Microcomputer Software in Academic Libraries and Copyright Implications," *The Journal of Academic Librarianship* 10 (5) (November 1984): 262–266.
12. Donna L. Ferullo, "Major Copyright Issues in Academic Libraries: Legal Implications of a Digital Environment," *Journal of Library Administration* 40 (1/2) (2004), p. 35.
13. Thomas H.P. Gould, Thomas A. Lipinski, and Elizabeth A. Buchanan, "Copyright Procedures and the Deciphering of Fair Use in the Creation of Reserves at Major University Libraries," *The Journal of Academic Librarianship* 31 (3) (May 2005): 182–197.
14. Judy Anderson and Lynn DeMont, "Treading Carefully Through the Murky Legalities of Electronic Reserves," *Computers in Libraries* 21 (6) (Jun 2001): 40–42, 44–45; Tanya Shkolnikov, "To Link or Not to Link: How to Avoid Copyright Traps on the Internet," *The Journal of Academic Librarianship* 28 (3) (2002): 133–140; Pat Wilson, "The Ins and Outs of Providing Electronic Reserves for Distance Learning Classes," *The Journal of Library Administration* 37 (3/4) (2002): 537–548; Richard Nollan, "Campus Intellectual Property Policy Development." *Reference Services Review* 32 (1) (2004): 31–34.
15. *Ibid.*
16. Pilch, "Fair Use and Beyond: The Status of Copyright Limitations and Exceptions in the Commonwealth of Independent States," p. 468–504.
17. *Ibid.*, p. 493.
18. Debbie L. Rabina, "Copyright Protection in Israel: A Reality of being 'Pushed into the Corner,'" *Information Research* 6 (4) (2001). Available: <http://informationr.net/ir/6-4/paper110.html> (November 2005).
19. Shachaf, "A Global Perspective on Library Association Codes of Ethics," p. 526.
20. For review of clustering of countries see for example by Simcha Ronen and Oded "Clustering Countries on Attitudinal Dimensions: A Review and Synthesis," *Academy of Management Review* (10) (1985): 435–454. They proposed the following eight clusters based on a review of all other existing clusters: Near Eastern, Nordic, Germanic, Anglo, Latin European, Latin American, Far Eastern, and Arab, as well as Independent that were proposed.
21. While Israel is in the Middle East, it cannot be treated as representative of Middle Eastern countries. However, it is clear that Israel is not an integral part of any of the other two clusters. This study treats Israel as an independent country in an unidentified cluster.
22. Internet Center for Corruption, Corruption Perception Index 2004. Available: <http://www.transparency.org/cpi/2004/cpi2004.en.html#cpi2004> (November 2005).
23. Israel Center for Digital Information Services, Available: <http://libnet.ac.il/~libnet/malmaid-israelnet.htm> (October 2005).
24. Regional University and Science Library Advanced Network in the North-West of Russia, available at http://www.ruslan.ru:8001/rus_lib.html (October, 2005); LibWeb, Available at <http://lists.webjunction.org/libweb/rus.html> (October 2005).

25. Association of Research Libraries, available at <http://www.arl.org/members.html>.
26. The differences among the first 50 ARL libraries and the Israeli and Russian libraries were apparent and we concluded that further examination of American libraries will not improve our comparative analysis.
27. The Web sites of the first 50 libraries on the membership list of ARL was examined. The list is organized by alphabetical order of states. There is no basis to assume that these 50 libraries' Web sites are not representative of the other member libraries.
28. Fons Trompenaars and Charles Hampden-Turner, *Riding the Waves of Culture: Understanding Cultural Diversity in Business*, 2nd ed. (London: Nicholas Brealey, 1998).
29. Kathryn Handley, "Rewriting the Rules of the Game in Russia: The Neglected Issue of Demand for Law." online. *East Europe Constitutional Review* 8 (4) (Fall 1999). Available: <http://www.law.nyu.edu/eecr/vol8num4/feature/rewriting.html> (November 2005); Kathryn Handley, "Demand for Law in Russia? A Mixed Picture," online. *East Europe Constitutional Review* 10 (4) (Fall 2001). Available: <http://www.law.nyu.edu/eecr/vol10num4/special/hendley.html> (November 2005).
30. Julia P. Melentieva, "The Russian Librarian's Professional Code of Ethics," in *The Ethics of Librarianship: An International Survey*, edited by Robert W. Vaagan (Munich: K.G. Saur, 2002) p. 213. It should be emphasized that this is an exact quote from this chapter.
31. Archie B. Carroll, "The Pyramid of Corporate Social Responsibility: Toward the Moral Management of Organizational Stakeholders," *Business Horizons* 34 (4) (July/August 1991): 39–48. The four levels they proposed are: At the lowest level, an organization assumes only economic responsibility and makes an effort to be profitable. At the second level, an organization assumes legal responsibility and obeys the law. At the third level, an organization assumes ethical responsibility, does what is right, and avoids harm. At the fourth and highest level, an organization takes a discretionary responsibility and contributes to the community and quality of life.
32. Elizabeth Gatewood and Archie B. Carroll, "The Anatomy of Corporate Social Response: The Rely, Firestone 500, and Pinto Cases," *Business Horizons* 24 (5) (September 1981): 9–16. January 2007 105