

INSTITUTIONAL PLAN TO EFFECTIVELY ADDRESS

Illegal File Sharing and Copyright Infringement

Use of Technology-Based Deterrents

The University of Houston uses several technologies to combat, identify, prevent and investigate illegal file sharing and copyright infringement.

- Bandwidth monitoring and limiting are used to restrict P2P file sharing within the university residence halls, an area of high P2P traffic.
- Active Directory, VPN, and DHCP logs are collected for the campus network. A robust search engine, Splunk, is used to correlate these logs with IP, time and logon data to find DMCA violators.
- Other technologies utilized on the UH network include: Blue Coat Packet Shaper for traffic shaping and bandwidth monitoring via a compilation of the Top Talkers list of network traffic
- The University of Houston is currently implementing Red Lambda IntegrityID. This software system will allow for monitoring of network traffic to collect specific usage data to assist in tracking and verifying DMCA notices that are received

Procedure for Handling Copyright Infringements Reports and DMCA Notices

1. The copyright owner must officially notify the University of Houston System of the alleged infringement. Notices can be made to Security@uh.edu, DMCA@uh.edu, or Abuse@uh.edu.
2. Once the notice is received, UIT Security logs the notice into several systems to assist in processing the notice and correlating data.
 - The DMCA notice is recorded in UIT Security's SharePoint site to assist in locating the violator and correlating statistical data for the monthly review.
 - The DMCA notice is also recorded in the BMC Remedy Action Request System to assist in generating the legal notices to the violator.
3. UIT Security locates the alleged violator using the methods described above in the Use of Technology-Based Deterrents section.
4. Once identified, the violator is notified via email of the notice and asked to "cease and desist" and remove the material listed in the notice.

Procedure for Handling Copyright Infringements Reports and DMCA Notices (continued)

If the alleged violator does not comply and further complaints are received, the matter is escalated to the student's college and the Dean of Students and/or the employee's supervisor for disciplinary action as stated in SAM Number: 07.A.04.

If the complainant is requesting information about an alleged violator, that request will be forwarded to UHS General Counsel for review and authorization.

Procedure for Effectiveness Review of the Process

The Copyright Infringement Reports and DMCA Notice process is reviewed monthly.

The overall effectiveness of the program is evaluated based on the number of DMCA notices received within the previous month. This number is compared with past months to establish a trend or direction of the program's overall effectiveness.

Analysis of the DMCA notices received determines what strategies are successful and what modifications to the program are necessary. These modifications can include infrastructure changes, policy and notification changes and directed awareness efforts.

Strategies that are modified are noted for comparison at the next monthly review.

The review process is conducted by the UIT Security Group with the assistance of other relevant UIT groups to help determine the effectiveness of current mitigation strategies on a university scale.

A strategic planning review occurs annually to review the overall effectiveness of the DMCA notice process and plan a strategy for future efforts.

Note: The DMCA reporting matrices are a Key Performance Indicator (KPI) for the UIT Security Group. The information is reported monthly to State of Texas Department of Information Resources (TX DIR). The outcome of the program is included in the Annual Information Security Report which is reviewed by the senior leadership of the University

Education and Awareness

To meet the annual disclosure requirement of HEOA, information regarding the University of Houston System Copyright Policy is emailed to students and published in the Student Handbook. The Student Handbook is published and distributed yearly (mailed) to all students, faculty, and staff of the University of Houston

University of Houston, Dean of Students Office
2009-2010 Student Handbook, Copyright Laws
<http://www.uh.edu/dos/pdf/2009-2010StudentHandbook.pdf> (page 79)

In compliance with State of Texas regulation, The University of Houston website maintains information about Reporting Copyright Infringement and Copyright Compliance. This information is accessible by a link in the footer on every UHS website page.

University of Houston System
Reporting Copyright Infringements
<http://www.uhsa.uh.edu/common/infringements.html>
Information on Copyright Compliance
<http://www.uhsa.uh.edu/common/copyright.html>

The University of Houston offers the Computer Security Awareness Training for Students (CSATS) program. This program is designed to ensure students are aware of computer security issues including illegally downloading music. This program also provides information about how to download music and other copyrighted information safely and legally without violating the Digital Millennium Copyright Act (DMCA). This program is primarily web based, but print and handout materials are made available. Handouts include a listing of legal sites where students can download music and other copyrighted material

Computer Security Awareness Training for Students Project (CSATS)
<http://www.uh.edu/infotech/csats/>

The University of Houston also has an awareness program for faculty and staff called Secure Our Systems. This program is designed to inform and educate University of Houston faculty and staff of federal, state, and university regulations and policies regarding computer security. The topics of illegal file sharing and copyright infringement are included in this online training course, which employees are mandated to complete annually. This training course is also required as part of Human Resources New Employee Orientation.

Secure Our Systems (SOS)
<http://www.uh.edu/hr/training/UHSONline.htm>