United States Copyright Office
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December 12, 2017

Joshua D. Curry
Dentons US LLP
303 Peachtree Street, NE
Suite 5300
Atlanta, GA 30308-3265

cc: Workers' Compensation Insurance Rating Bureau of California
Attn: Legal Project Specialist
1221 Broadway, Suite 900
Oakland, CA 94612

Re: Second Request for Reconsideration for Refusal to Register California Workers' Compensation Experience Rating Plan—1995, Title 10, California Code of Regulations, Section 2353.1, Effective January 1, 2016; Correspondence ID: 1-22HYWXC; SR: 1-279543922; and Miscellaneous Regulations for the Recording and Reporting of Data—1995, Title 10, California Code of Regulations, Section 2354, Effective January 1, 2016; Correspondence ID: 1-22JKHIP; SR: 1-2795439120

Dear Mr. Curry:

The Review Board of the United States Copyright Office ("Board") has considered Workers' Compensation Insurance Rating Bureau of California's ("Rating Bureau") second request for reconsideration of the Registration Program's refusal to register a text claim in two works: (1) California Workers' Compensation Experience Rating Plan—1995, Title 10, California Code of Regulations, Section 2353.1, Effective January 1, 2016 ("Rating Plan"); and (2) Miscellaneous Regulations for the Recording and Reporting of Data—1995, Title 10, California Code of Regulations, Section 2354, Effective January 1, 2016 ("Miscellaneous Regulations") (collectively, "Works"); the Board also has reviewed Rating Bureau's revised compilation claims added in the amended applications.[1] After reviewing the amended application, deposit copy, and relevant correspondence for each of the Works, along with the arguments in the second requests for reconsideration, the Board affirms the Registration Program's denials of registration on the text claims, and denies Rating Bureau's request to register claims in "revised compilation."

[1] With its second requests for reconsideration, Rating Bureau submitted amended applications claiming, in addition to text, the revised compilations.

I. DESCRIPTION OF THE WORKS

The Works are revisions to textual compilations of government publications: Miscellaneous Regulations compiles various insurance regulations, and Rating Plan updates a compensation experience rating plan applicable in the State of California. The revisions include updated introductions and other text, such as the disclaimer, headers, and information on the back cover. Almost all revisions amount to small, technical changes (e.g., replacing "2015" with "2016" on the title pages and replacing "A.M." with "AM" in the memorandums). To demonstrate the kinds of changes that were made, attached as appendices to this letter are the first three pages of redlines submitted by the applicant, which compare each of the Works to their respective 2015 editions.

As the applicant has noted, numerous prior editions were granted copyright registrations. The registered compilations date back to 1995, and each of the revisions for 2007 to 2015 were separately registered for copyright protection. *See* Rating Plan Second Request for Reconsideration at 1–2; Miscellaneous Regulations Second Request for Reconsideration at 1.

II. ADMINISTRATIVE RECORD

On October 19, 2015, Rating Bureau filed applications to register copyright claims in the Works. In two letters dated June 21, 2016, a Copyright Office registration specialist refused to register claims in either Rating Plan or Miscellaneous Regulations, in both cases finding that the Works "lack[] a sufficient amount of new copyrightable authorship." Rating Plan Letter from Megan Yanik, Registration Specialist, to Legal Project Specialist, Rating Bureau at 1 (June 21, 2016); Miscellaneous Regulations Letter from Megan Yanik, Registration Specialist, to Legal Project Specialist, Rating Bureau at 1 (June 21, 2016).

In two letters dated September 19, 2016, Rating Bureau requested that the Office reconsider its initial refusal to register the Works. Rating Plan Letter from Joshua D. Curry, Dentons US LLP to U.S. Copyright Office (Sept. 19, 2016) ("Rating Plan First Request"); Miscellaneous Regulations Letter from Joshua D. Curry, Dentons US LLP to U.S. Copyright Office (Sept. 19, 2016) ("Miscellaneous Regulations First Request"). After reviewing the Works in light of the points raised in the First Requests, the Office re-evaluated the claims and again concluded that the Works contain only minimal new text from previous editions and cannot be registered because "the few textual additions do not exhibit sufficient creativity, or are predetermined by the subject matter, to support a copyright registration." Rating Plan Letter from Stephanie Mason, Attorney-Advisor, to Joshua D. Curry, Dentons US LLP at 2 (March 2, 2017); Miscellaneous Regulations Letter from Stephanie Mason, Attorney-Advisor, to Joshua D. Curry, Dentons US LLP at 2 (March 2, 2017).

In two letters dated June 1, 2017, Rating Bureau requested that, pursuant to 37 C.F.R. § 202.5(c), the Office reconsider for a second time its refusal to register the Works. Rating Plan Letter from Joshua D. Curry, Dentons US LLP to U.S. Copyright Office (June 1, 2017) ("Rating

Plan Second Request"); Miscellaneous Regulations Letter from Joshua D. Curry, Dentons US LLP to U.S. Copyright Office (June 1, 2017) ("Miscellaneous Regulations Second Request"). In those letters, Rating Bureau noted that "[m]any prior editions," including the 2015 editions, were granted copyright registrations by the Office. Rating Plan Second Request at 1–2; Miscellaneous Regulations Second Request at 1. The letters then argued that it "is not attempting to claim copyright in only certain short words and phrases that differ between the current version of the work and prior versions of it" but in "a revised compilation comprising some original text and also a selection, coordination, and arrangement of statutes and regulations." Rating Plan Second Request at 3; Miscellaneous Regulations Second Request at 3.

III. DISCUSSION

A. The Legal Framework

1) Distinction Between Ideas and Expression

Section 102(b) of the Copyright Act provides that copyright protection for expressive works does not extend to "any idea, procedure, process, system, method of operation, concept, principle, or discovery, regardless of the form in which it is described, explained, illustrated, or embodied in such work." 17 U.S.C. § 102(b). Section 102(b) codifies the longstanding principle, known as the idea-expression dichotomy, that copyright law protects the original expression of ideas, but not the underlying ideas themselves. The Supreme Court in 1879 held that the copyright in a book describing a bookkeeping system, with blank forms and ruled lines and headings, did not give the copyright owner the right to prevent others from using the book-keeping system described nor "the exclusive right to make, sell, and use account-books prepared upon the plan set forth in such book." *Baker v. Selden*, 101 U.S. 99, 102–04 (1879).

Though the Office is permitted to register a sufficiently original artistic description, explanation, or illustration of an idea, procedure, process, system, method of operation, concept, principle, or discovery, *see* H.R. Rep. No. 94–1476, at 56 (1976), "the registration would be limited to the copyrightable literary, musical, graphic, or artistic aspects of the work . . ." COMPENDIUM (THIRD) § 313.3(A). This principle is manifested in the Office's regulations, which bar copyright protection for "[i]deas, plans, methods, systems, or devices, as distinguished from the particular manner in which they are expressed or described in a writing." 37 C.F.R. § 202.1(b). Originality springs from independent creation, not from discovering a yet-unknown mathematical principle. *See Feist Publ'ns, Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 347 (1991) ("[O]ne who discovers a fact is not its maker or originator. The discoverer merely finds and records."). Additionally, the Copyright Office will not register claims in legislative text. *See* COMPENDIUM (THIRD) § 313.6(C)(2); *see also Howell v. Miller*, 91 F. 129, 137 (6th Cir. 1898) (Harlan, J.) ("[N]o one can obtain the exclusive right to publish the laws of a state in a book prepared by him.").

Copyright's merger doctrine, which states that idea and expression merge together when the expression cannot be separated from the idea, is a closely related principle that bars copyrightability of certain works. *See Baker*, 101 U.S. at 103 (explaining that if the "art" that a book "teaches cannot be used without employing the methods and diagrams used to illustrate the book, or such as are similar to them, such methods and diagrams are to be considered as necessary incidents to the art, and given therewith to the public"); *CCC Info. Servs., Inc. v. Maclean Hunter Market Reports, Inc.*, 44 F.3d 61, 68 (2d Cir. 1994) ("[W]hen the expression is essential to the statement of the idea, the expression also will be unprotected, so as to insure free public access to the discussion of the idea.").

2) Originality

A work may be registered if it qualifies as an "original work[] of authorship fixed in any tangible medium of expression." 17 U.S.C. § 102(a). In this context, the term "original" consists of two components: independent creation and sufficient creativity. *See Feist Publ'ns. Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 345 (1991). First, the work must have been independently created by the author, *i.e.*, not copied from another work. *Id.* Second, the work must possess sufficient creativity. *Id.* Only a modicum of creativity is necessary, but the Supreme Court has ruled that some works (such as the alphabetized telephone directory at issue in *Feist*) fail to meet even this low threshold. *Id.* The Court observed that "[a]s a constitutional matter, copyright protects only those constituent elements of a work that possess more than a *de minimis* quantum of creativity." *Id.* at 363. It further found that there can be no copyright in a work in which "the creative spark is utterly lacking or so trivial as to be virtually nonexistent." *Id.* at 359.

The Office's regulations implement the longstanding requirement of originality set forth in the Copyright Act and described in the *Feist* decision. *See, e.g.*, 37 C.F.R. § 202.1(a) (prohibiting registration of "[w]ords and short phrases such as names, titles, slogans; familiar symbols or designs; [and] mere variations of typographic ornamentation, lettering, or coloring"); *id.* § 202.10(a) (stating "to be acceptable as a pictorial, graphic, or sculptural work, the work must embody some creative authorship in its delineation or form"). Some combinations of common or standard design elements may contain sufficient creativity with respect to how they are juxtaposed or arranged to support a copyright. Nevertheless, not every combination or arrangement will be sufficient to meet this test. *See Feist*, 499 U.S. at 358 (finding the Copyright Act "implies that some 'ways' [of selecting, coordinating, or arranging uncopyrightable material] will trigger copyright, but that others will not"). A determination of copyrightability in the combination of standard design elements depends on whether the selection, coordination, or arrangement is done in such a way as to result in copyrightable authorship. *Id.*; *see also Atari Games Corp. v. Oman*, 888 F.2d 878 (D.C. Cir. 1989).

A mere simplistic arrangement of non-protectable elements does not demonstrate the level of creativity necessary to warrant protection. For example, the United States District Court for the Southern District of New York upheld the Copyright Office's refusal to register simple

designs consisting of two linked letter "C" shapes "facing each other in a mirrored relationship" and two unlinked letter "C" shapes "in a mirrored relationship and positioned perpendicular to the linked elements." *Coach, Inc. v. Peters*, 386 F. Supp. 2d 495, 496 (S.D.N.Y. 2005). Likewise, the Ninth Circuit has held that a glass sculpture of a jellyfish consisting of clear glass, an oblong shroud, bright colors, vertical orientation, and the stereotypical jellyfish form did not merit copyright protection. *See Satava v. Lowry*, 323 F.3d 805, 811 (9th Cir. 2003). The language in *Satava* is particularly instructive:

> It is true, of course, that a *combination* of unprotectable elements may qualify for copyright protection. But it is not true that *any* combination of unprotectable elements automatically qualifies for copyright protection. Our case law suggests, and we hold today, that a combination of unprotectable elements is eligible for copyright protection only if those elements are numerous enough and their selection and arrangement original enough that their combination constitutes an original work of authorship.

Id. (internal citations omitted).

Though the Office will not register a copyright claim in legislative text, it may register a work that includes legislative text. "A legal publication that analyzes, annotates, summarizes, or comments upon a legislative enactment, a judicial decision, an executive order, an administrative regulation, or other edicts of government may be registered as a nondramatic literary work, provided that the publication contains a sufficient amount of literary expression." COMPENDIUM (THIRD) § 717.1. Thus, for example, the Office would register a compilation of legislative materials, provided that the author exercised sufficient creativity in selecting the compilation material. *Id.* The Office also would register a treatise that analyzes legal subjects. *Id.* Depending on the type of work consisting of legislative materials, the threshold for creativity can be met by selection and arrangement or by adding literary text—or by both.

Finally, a derivative work—that is, one that "substantially copied from a prior work," 1 NIMMER ON COPYRIGHT § 3.01; *see also* 17 U.S.C. § 101—must independently satisfy the standards for copyright protection discussed above. *See Waldman Publishing Corp. v. Landoll, Inc.*, 43 F.3d 775, 782 (2d Cir. 1994); COMPENDIUM (THIRD) § 311.2. A purported derivative work is not automatically entitled to copyright protection simply because the underlying work received a copyright registration. It must demonstrate "a distinguishable variation that is more than merely trivial." *Waldman Publishing*, 43 F.3d at 782 (citing *L. Batlin & Son, Inc. v. Snyder*, 536 F.2d 486 (2d Cir. 1976) (en banc)). In fact, "[s]pecial caution is appropriate when analyzing originality in derivative works. . . ." *We Shall Overcome Found. v. The Richmond Org., Inc.*, No. 16cv2725, 2017 WL 3981311, at *13 (S.D.N.Y. Sept. 8, 2017).

B. Analysis of the Works

After carefully examining the Works and applying the legal standards discussed above, the Board finds that the Works do not contain the authorship necessary to sustain a claim to copyright.

Rating Bureau asserts copyright claims in text and compilation from the revisions made to the 2015 editions of the Works. Rating Bureau is careful to disclaim aspects of the Works that existed in the earlier editions, as well as to disclaim any legislative or regulatory text. The "copyright claim[s] [are] only to the original authorship it added in the compilation and the selection, coordination and arrangement of the material in the 2016" Works. Rating Plan Second Request at 3; Miscellaneous Regulations Second Request at 3. The revised text, including some minor additions, and the revisions to the selection, arrangement, and layout of the compilations as a whole are what Rating Bureau seeks to register.

Rating Bureau notes that compilations are copyrightable subject matter when they satisfy the "extremely low" threshold of creativity detailed in *Feist*. Rating Plan Second Request at 54 (quoting *Feist*, 499 U.S. at 345); Miscellaneous Regulations Second Request at 4 (same). And Rating Bureau is correct in stating that "[a] compilation of legislative enactments . . . is copyrightable, 'provided that the author exercised a sufficient amount of creativity in selecting, coordinating, and/or arranging the material that appears in the compilation.'" Rating Plan Second Request at 4 (quoting COMPENDIUM (THIRD) § 717.1); Miscellaneous Regulations Second Request at 4 (same).

The Board has not questioned the copyrightability of the Miscellaneous Regulations and Rating Plan generally. However, the Works are derivatives of the 2015 Rating Plan (TX 8-004-813) and 2015 Miscellaneous Regulations (TX 8-004-815), and, as such, the *new material* contained in the Works must by itself by enough to satisfy copyright law's minimum level of creativity. To this end, Rating Bureau provided a redline comparison of the Works to the 2015 versions from which they are derived and claimed that this comparison demonstrates that Rating Bureau "made more than modest, trivial changes." Rating Plan Second Request at 5; Miscellaneous Regulations Second Request at 5. The Board disagrees.

The Works before the Review Board fail to demonstrate sufficient creativity and thus are not eligible for copyright protection. To begin, Rating Bureau overstates the copyrightable new material added to the 2016 editions of Rating Plan and Miscellaneous Regulations. Rating Bureau claims to have made sufficiently creative changes to the (a) title page, (b) disclaimer text, (c) memorandum, (d) table of contents, (e) page headers, and (f) back cover. *See* Rating Plan Second Request at 3–4; Miscellaneous Regulations Second Request at 3–4. But upon a careful side-by-side review of the 2015 and 2016 editions, the Office finds that any changes to the table of contents are minimal and to the page headers are imperceptible; the changes to the title page and the back cover—*in toto*, replacing "2015" with "2016" and changing the applicant's address—represent merely technical factual changes. Changes to the disclaimer text and

memorandum are similarly almost entirely factual or technical. Maybe the most substantial addition appears in the disclaimer text for each of the Works, which replace the 2015 text "Web site or through any computer or electronic means for any purpose" with "website or on any form of social media" and includes the new text "No copyright is claimed in the text of statutes and regulations quoted within this work."

The majority of the new material in the Works is not eligible for copyright protection based on copyright law's merger doctrine. Changing the year of the publication from 2015 to 2016, in numerous places, is factual, and there is obviously only one way of expressing that fact; changing the mailing address of the publisher on the back page and replacing the mailing address with an email address in the disclaimer text are merged factual revisions too. Such changes are not eligible for copyright protection. *See Feist*, 499 U.S. at 347. Additionally, replacing "A.M." with "AM" is not copyrightable because there are a limited number of ways to express the idea of ante meridiem, particularly when time is written in numeral form. *See Baker*, 101 U.S. at 103; *CCC Info. Servs., Inc.*, 44 F.3d at 68.

Even if those changes were not barred from copyright protection on merger grounds, they would be ineligible as *de minimis*. *See Feist*, 499 U.S. at 363 "[C]opyright protects only those constituent elements of a work that possess more than a *de minimis* quantum of creativity."); COMPENDIUM (THIRD) § 313.4(B) ("Works that contain no expression or only a *de minimis* amount of original expression are not copyrightable and cannot be registered with the U.S. Copyright Office."). The additional new material in the Works—*i.e.*, the new text in the disclaimer text and the memorandum—similarly suffers from making such trivial contributions to the Works as to be *de minimis*. This includes the analysis in the Miscellaneous Regulations memorandum, which is nearly identical to that appearing in the 2015 editions, except with limited new language such as:

> Part 2, *Workers' Compensation Forms and Coverage*
> 2. Section I, *Approval by Insurance Commissioner*, was amended for consistency with the proposed revisions to Title 10 of the California Code of Regulations Sections 2250 et seq.

That text is primarily factual, and the portion that is not (*e.g.*, "was amended for consistency with the proposed revisions") raises merger doctrine concerns. More conclusively, these limited additions are too minimal to sustain copyright's threshold, low though it is, for creativity. *See We Shall Overcome Found.*, 2017 WL 3981311, at *14 (concluding that minor changes to the lyrics of a derivative version of a song were "too trivial" to "create a distinguishable variation"). The Rating Plan memorandum, though containing slightly more added text (*e.g.*, "Rule 4, *Losses*, and Rule 6, *Contract Medical Losses*, were amended to reflect the addition of Table I that includes Expected Loss Rates and D-Ratios and Table II that includes credibility values, average death value and the maximum loss value and for clarity"), is similarly factual and, where not, *de minimis*.

Beyond the additions of text, Rating Bureau also claims that the variations in selection, layout, and arrangement between the Works and the 2015 editions entitle the Works to copyright protections as revised compilations. Specifically, Rating Bureau claims that it "exercised creative discretion to select a subset of specific statutes" and that it

> [a]lso coordinated and arranged the statutory text in a specific, creative way (e.g., full page breaks between Sections I-VIII of the statutory language, Tables I-II, and ratings forms, intentionally blank pages separating each of the foregoing for ease of use, and cover and back pages that appear as their own stand-alone pages) and prepared and added a table of contents absent from the statutory text for this specific arrangement.

Rating Plan Second Request at 5. *See also* Miscellaneous Regulations Second Request at 5 (making similar claims). But this coordination and arrangement, assuming *arguendo* that it exhibits copyrightable authorship, was overwhelmingly preexisting. For the Works, the applicant applied trivial changes to the existing coordination and arrangement that it used in the earlier versions.

Indeed, an overall comparison of the Works with the 2015 editions shows such minimal changes as to be ineligible for copyright protection. A protectable derivative work, as already stated, must demonstrate "a distinguishable variation that is more than merely trivial." *Waldman Publishing*, 43 F.3d at 782 (citing *L. Batlin & Son, Inc. v. Snyder*, 536 F.2d 486 (2d Cir. 1976) (en banc)). The Board does not perceive any variations that are more than merely trivial when reviewing the Works. Because the Works do not independently demonstrate sufficient creativity to sustain a copyright claim, they cannot be registered as derivative works. *See Waldman Publishing*, 43 F.3d at 782; *Grove Press, Inc. v. Collectors Publication, Inc.*, 264 F.Supp. 603, 606 (C.D. Cal. 1967).

Finally, the Board addresses Rating Bureau's suggestion that the Works should receive protection because previous editions of the Works were registered by the Office. *See* Rating Plan Second Request at 3–4; Miscellaneous Regulations Second Request at 6. This argument appears to be based on a misconception: that new claims should be registered by the Office because similar works of authorship were previously registered. However, the Office independently reviews each submission it receives without reference to prior works, no matter how apparently similar. Moreover, two works from within the same class may receive different copyright treatment: one may evince sufficient creativity though the other does not. This is particularly true when dealing with derivative works because copyright protection is only afforded to the derivative work if it adds sufficient creative expression to the original. There is no presumption of protection for a derivative work; it must be evaluated on its own. In evaluating the Works, the Board makes no judgment about whether the previous differences between registered works were all sufficient to sustain new copyright claims. However, the Office may choose to reopen and re-examine those registrations.

IV. CONCLUSION

For the reasons stated herein, the Review Board of the United States Copyright Office affirms the refusal to register the copyright claims in the Works. Pursuant to 37 C.F.R. § 202.5(g), this decision constitutes final agency action in this matter.

BY: _____
Chris Weston
Copyright Office Review Board

Appendix A

California Workers' Compensation Experience Rating Plan—1995, Title 10, California Code of Regulations, Section 2353.1, Effective January 1, 2016

Redline of first three pages (as submitted by applicant)

California Workers' Compensation Experience Rating Plan—1995

Title 10,10, California Code of Regulations, Section 2353.1

Effective January 1, 20152016

Memorandum

Regarding the January 1, ~~2015~~2016 Revisions of the California Workers' Compensation Experience Rating Plan—1995

Revisions Approved Effective January 1,

~~2015~~2016 Section I, *General Provisions*

1. Rule 2, *Effective Date*, was amended to show the effective date of the Experience Rating Plan is 12:01 ~~A.M.~~AM, January 1, ~~2015~~ 2016.

Section II, Definitions

2. Rule 10, *Pure Premium Rates*, was eliminated as experience modification eligibility will no longer be dependent on pure premium rates.

Section III, *Eligibility and Experience Period*

3. ~~2.~~Rule 3, ~~*Experience to be Used for Rating*~~1, *Eligibility Requirements for California Workers' Compensation Insurance ~~Risks~~*, ~~Subrule f, was amended to correct the reference to Part 4, Unit *Statistical Reporting Requirements*, of the *California Workers' Compensation Uniform Statistical Reporting Plan—J 995*~~, was amended to change the eligibility threshold to be predicated upon expected loss rates rather than pure pre- mium rates and to include the amount of the eligibility threshold.

Section VI, *Tabulation of Experience*

4. Rule 4, *Losses*, and Rule 6, *Contract Medical Losses*, were amended to reflect the addition of Table I that includes Expected Loss Rates and D-Ratios and Table II that includes credibility values, average death value and the maximum loss value and for clarity.

Section VII, *Rating Procedure*

5. ~~3.~~Rule ~~8~~, ~~*Experience Modification Formula*~~, ~~was amended to limit experience modifications for employers with only a single claim in the experience period to be no more than 25 percentage points above the experience modification the employer would have received if loss free during the experience period, with the exception of experience modifications computed exclu~~ding ~~unaudited payroll pursuant to Section III, Rule 3(g)~~ 2, *Credibility Primary (Cp) Value*, Rule 3, *Expected Primary (Ep) Losses*, Rule 5, *Credibility Excess (Ce) Value*, and Rule 7, *Expected (E) Losses*, were amended to reflect the addition of Table I that includes Expected Loss Rates and D-Ratios and Table II that includes credibility values, average death value and the maximum loss value and for clarity.

Section VIII, *Inquiries, Complaints and Requests for Action, Reconsideration and Appeals*

6. Rule 3, *Complaints and Requests for Action*, was amended to reflect the WCIFB's new address and add an email contact.

Table I, *Expected Loss Rates and Full Coverage D-Ratios*

7. Table I was added to incorporate the plan values into the plan and reflect the most current data available.

Table II, *Credibility Primary and Credibility Excess Values*

1. Table II was added to incorporate the current credibility values into the plan.

Appendix B

Miscellaneous Regulations for the Recording and Reporting of Data—1995, Title 10, California Code of Regulations, Section 2354, Effective January 1, 2016

Redline of first three pages (as submitted by applicant)

Workers' Compensation Insurance Rating Bureau of California®

Miscellaneous Regulations for the Recording and Reporting of Data—1995

Title 10, California Code of Regulations, Section 2354

Effective January 1, 20152016

WCIRB California®
Objective.Trusted.Integral

Memorandum

Regarding the January 1, 20152016 Revision to the Miscellaneous Regulations for the Recording and Reporting of Data—1995

Revisions Approved Effective January 1, ~~2015~~2016

Part 1, *General Provisions*

1. Section I, *Introduction*, Rule 2, *Effective Date*, was amended to show the effective date of the amended Miscellaneous Regulations is 12:01 A.M.AM, January 1, ~~2015~~.2016.

Part 2, *Workers' Compensation Forms and Coverage*

2. Section I, *Approval by Insurance Commissioner*, was amended for consistency with the proposed revisions to Title 10 of the California Code of Regulations Sections 2250 et seq.
3. Section II, *Conformity with Insurance Code and California Code of Regulations*, was amended for consistency with the proposed revisions to Title 10 of the California Code of Regulations Sections 2250 et seq.

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