

I wish to submit this response to the discussion draft, specifically on the issue of trade book sales on 2.5. The document suggests that the bulk of a title's sales will occur in the first 12 months after publication. The draft recommendation responds to this suggestion by recommending PIRs only for the first 12 months of a title's life.

For many genres, some more than others, backlist sales are significant (e.g. titles that are published in a series, modern "classics" such as the Top 100 favourites at various bookstores, titles that go on to be adapted for other media).

If the import restrictions are worth keeping for the first 12 months, *then they are worth keeping in perpetuity*. No genre or writer should be unfairly penalised for creating titles that inspire longevity.

Regards
Kim Wilkins

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