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Copyright Arbitration Royalty Panel (CARP)
P.O. Box 70977
Southwest Station
Washington, DC 20024-0977

GENERAL COUNSEL
OF COPYRIGHT

In the Matter of

DOCKET NO.
RM 2002.1
COMMENT NO. 23

Notice and Recordkeeping for Use of
Sound Recordings Under Statutory License

Websound, Inc. submits these comments, pursuant to the request for reply to comments of the Copyright Office published in the Federal Register, Vol. 67, No. 26 5761 February 7, 2002.

Websound, Inc. is a webcaster and syndicator of digitally transmitted music programming over the internet. With respect to RIAA's proposed uniform report of performance, Websound is acutely aware of the significant technical challenges posed by different streaming technologies with regard to accurately tracking performances and constructing reports consistent with the proposed parameters.

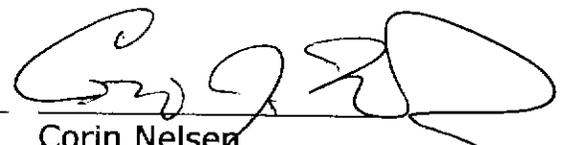
As a result, Websound has successfully developed and tested RadLog (www.radlog.com), a method for efficiently and accurately tracking performances based on cross-referencing raw server log data with song specific and playlist data, and correlating the result into a report format consistent with the proposed guidelines.

Websound intends to make this technology available to any and all parties who may wish to avail themselves of a fully integrated tracking and reporting solution for the purpose of complying with the required reporting parameters.

Respectfully Submitted,


Glenn Fisher
Chief Technology Officer


Billy Straus
President


Corin Nelsen
Director of I-Media