

**AUTHOR SERVICES, INC.
7051 HOLLYWOOD BLVD.
HOLLYWOOD, CA 90028**

March 8, 2011

Office of the General Counsel
U.S. Copyright Office
James Madison Memorial Building
Room LM—401
101 Independence Avenue, S.E.
Washington, DC 20559-6000

Re: Protection of Sound Recordings Fixed Before February 22, 1972
Docket No. 2010-4

Dear Sirs:

To add to the statement filed by the Recording Industry of America, specifically concerning the copyright issues and policy, page 24. There is one further point to consider that I did not see mentioned in any of the filings filed in response to the above notice.

Under Section 909 of Copyright Office Compendium II, it states:

“Publication of recorded material first distributed before January 1, 1978. Where a musical, dramatic, or literary work was distributed only in the form of phonorecords before January 1, 1978, such musical, dramatic, or literary work was not registerable as a published work under the Act of 1909, as amended. Under the present law, the public distribution of phonorecords on or after January 1, 1978, publishes the musical, dramatic, or literary works recorded thereon. Therefore, if publication of a pre-1978 phonorecord continued on January 1, 1978, that date is considered to be the date of first publication of the underlying work for purposes of copyright registration.

There are a lot of copyright registrations that were filed following the above section and that fact should be taken into consideration as part of the rest of the information being gathered by the Copyright Office.

If there is any further information that I can provide, please let me know. I can be contacted at the above address and or emailed at ryland@authorservicesinc.com.

Very truly yours,

Ryland Hawkins