

**Before the
UNITED STATES COPYRIGHT OFFICE
Washington, D.C.**

In the Matter of:

Docket No. 2014-08

Fees for Submitting Corrected
Electronic Title Appendices

**COMMENTS OF THE
RECORDING INDUSTRY ASSOCIATION OF AMERICA, INC.**

The Recording Industry Association of America, Inc. (“RIAA”) is pleased to have the opportunity to provide these comments in response to the Copyright Office’s September 17, 2014 Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding. *See* 79 Fed. Reg. 55694 (September 17, 2014).

The RIAA is the trade organization that supports and promotes the creative and financial vitality of the major music companies. Its members comprise the most vibrant record industry in the world. RIAA members create, manufacture and/or distribute approximately 85% of all legitimate recorded music produced and sold in the United States. In connection with their business, RIAA’s members have registered many thousands of copyrights and also record documents pertaining to copyrights.

On September 17, 2014 the Copyright Office (the “Office”) published a final rule amending its regulations to allow remitters to submit title lists in electronic format when recording a document pertaining to 100 or more copyrighted works. *See* 79 Fed. Reg. 55633 (September 17, 2014). As the rule explains, when a remitter submits an electronic title list along with a document for recordation, the Office will use the information in the electronic list to populate its online Public Catalog. In response to comments filed by the RIAA during the electronic title list rulemaking, the Office established a process to allow a remitter to correct inaccuracies in the Office’s online Public Catalog resulting from errors in an electronic list submitted by the remitter. We applaud the Office for implementing such a process.

Having established a process for correcting electronic title appendices in the earlier rulemaking, the Office now seeks comments on a proposal to charge seven dollars (\$7) per corrected title for this service. The RIAA understands and appreciates the need for the Office to charge a fee to cover the time that examiners are required to spend implementing any corrections to electronic title appendices. We believe that, in most instances, the number of errors identified after an electronic title appendix has been carefully prepared, reviewed and submitted along with a document for recordation is likely to be small. Where the number of requested title corrections is modest, we view a fee of \$7 per corrected title as reasonable.

In those presumably rare situations where a major clerical error requires a remitter to correct a large number of titles, a fee of \$7 per title could serve as a disincentive for correcting the

