

May 23, 2014

Jacqueline C. Charlesworth  
General Counsel and Associate Register of Copyrights  
Library of Congress  
Copyright Office  
101 Independence Avenue, S.E.  
Washington, D.C. 20559-6000

Docket No. 2014-03

Re: Music Licensing Study

Dear Jacqueline C. Charlesworth:

The Content Creators Coalition, an artist rights organization made up of people who create content—including recording artists, songwriters, filmmakers, writers, photographers, visual artists, performers, producers—is responding to the Copyright Office’s Notice of Inquiry on music licensing.

Although the Office is seeking comments on a variety of topics, the Content Creators Coalition has identified one that is of core importance: the right of all creative people to be compensated for their work. Thus we are commenting to state that we support a full public performance right for sound recordings, to apply in areas beyond digital audio transmission such as terrestrial radio.

Recording artists currently receive compensation for their music from satellite radio, cable radio, and Internet webcasts. But over-the-air broadcasters have a unique exemption and are the only form of radio not required to compensate creators. That does not make sense and seems a double standard. Over-the-air radio stations can use music to build their audience and advertising revenue but then do not share any of that revenue with the performers and artists. Over-the-air radio stations can and should compete under the same rules as their competitors.

Fundamental fairness dictates that recording artists and musicians of all types, including lead performers, session musicians, and singers, should be compensated for their work. To enjoy the fruits of your own labor is certainly an American principle and a principle that has support all across the world. The Universal Declaration of Human Rights recognizes that everyone is entitled to the protection of the moral and material benefit that results from their creative work. We believe U.S. law should reflect this basic principle.

We also want to make clear that we do not believe a full performance right should come at the expense of songwriters or composers. Any solution for recording artists should not cannibalize the licensing income of songwriters.

Respectfully submitted,

Ellen Seidler, independent filmmaker/author/scholar  
Marylin Carino, Recording Artist  
Melvin Gibbs, bass guitarist/composer/producer  
Wesley Stace, singer/songwriter/author (John Wesley Harding)  
Matthew Weiner, writer, show creator (Mad Men)  
Rhett Miller, singer/songwriter (Old 97's)  
David Lowery, singer/songwriter (Cracker, Camper van Beethoven)  
Bette Midler, singer/actor  
Sam Phillips, singer/songwriter  
Kahil Elzabar composer/musician/educator  
Marc Ribot, recording artist (Tom Waits, Cubanans Postizos, and others)  
Matthew Monfort, guitarist (Ancient Future)  
Chris Ruen, author  
T Bone Burnett, producer  
Rosanne Cash, singer/songwriter/author  
Elvis Costello, Recording Artist  
Diana Krall, Recording Artist  
John Leventhal, songwriter/musician/record producer  
Rodney Crowell, singer/songwriter/author  
Marc Cohn, singer/songwriter  
Chely Wright, singer/songwriter/author  
Steve Earle, singer/songwriter/author  
Jill Sobule, songwriter/musician  
Grant Lee Phillips, singer/songwriter  
Hal Wilner, record producer  
Carter Burwell, composer  
John Zorn, composer/musician  
Rupa Marya, singer/songwriter (Rupa & the April Fishes)  
Peter Orner, author  
Allison Moorer, singer/songwriter  
Joan Osborne, singer/songwriter  
Colin Linden, singer/songwriter (Blackie and the Rodeo Kings)  
John McCrea, singer/songwriter (CAKE)  
East Bay Ray, co-founder/guitarist (Dead Kennedys)  
Mike Doughty, singer/songwriter/author  
Boots Riley, rapper/songwriter (the Coup)  
Katie Crouch, author  
Joe Henry, singer/songwriter/author/record producer  
Count, producer/engineer/mixer  
Steve 'Flip' Lippman, filmmaker

Larry Kirwan, author/singer (Black 47)  
Tift Merritt, singer/songwriter  
Sarah Joyce, singer/songwriter (Rumor)  
Cory Chisel, singer/songwriter  
Christine Filipak, artist/author (Monolith Graphics)  
Joseph Vargo, songwriter/author/artist/producer (Nox Arcana, Monolith Graphics)  
William Piotrowski, songwriter/engineer (Nox Arcana)  
Al Yankovic, singer/songwriter  
Speech, rap artist, writer (Arrested Development)  
Chris Thile, singer/songwriter (Punch Brothers, Nickel Creek)  
Michael Beinhorn, musician/record producer (Herbie Hancock, RHCP, Soundgarden,  
Marilyn Manson, Hole,)  
John Cate, songwriter/musician  
Reinhold Heil, musician/songwriter, producer, film & TV composer)  
Manda Mosher, musician/songwriter (Calico)  
Gabe Witcher, fiddle player (Punch Brothers)  
Noam Pikelny, banjo player (Punch Brothers)  
Chris Eldridge, guitar player (Punch Brothers)  
Paul Kowert, bass player (Punch Brothers)  
Lucy Miyaki, musician/songwriter (Tashaki Miyaki)  
Michael A. Levine, film & TV composer  
Max Collins, singer/songwriter (Eve 6)  
Jon Siebels, guitarist (Eve 6)  
Emily Kinney, singer/songwriter, actor (Walking Dead)  
Kelly Corrigan, author  
Eric Gorfain, singer/songwriter  
Peter Case, singer/songwriter  
Freddy Johnston, singer/songwriter  
Tim Easton, singer/songwriter  
Tony Fagenson, drummer (Eve 6)  
Matt McDermott, musician/songwriter  
Matthew Montfort, songwriter/musician  
Eagle-Eye Cherry, singer/songwriter  
Michael Franti, singer/songwriter  
Shooter Jennings, singer/songwriter  
Chris Paine, filmmaker (Who Killed The Electric Car?)