

**COMMENTS FOR THE STRATEGIC PLAN OF THE IMPROVEMENT OF RECORDATION SERVICES
AND QUALITY OF COPYRIGHT INFORMATION**

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Digital Creator Split Sheet and Copyright Management

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1. A Guided Remitter Responsibility Model of Electronic Recordation. As noted above, the high cost and long processing time currently associated with copyright document recordation stem in large part from a process in which recordation specialists must read paper documents and manually transcribe selected information from them to electronic catalog records that become part of the Copyright Office Catalog. Electronic submission of such information by remitters could certainly reduce the time need to process a document for recordation. However, checking information submitted electronically by remitters against each remitted document itself would still be a time-consuming process. Remitted documents do not come in any particular format, and there is no single standard for the language used in those documents or the order in which documents use language with legal effect. As a result, recordation specialists would still have to spend substantial time reading and interpreting the documents to check submitted catalog entry information, such as the names of the two or more parties to the transaction, the role of the parties as grantors or recipients of the interests being transferred, the nature of the interests that are being transferred, and the titles, registration numbers, or other identifiers of the works in which interests are being transferred.

Because of the process of comparing submitted catalog information against each individual remitted document is irreducibly time-consuming, the Copyright Office is considering adopting a model under which remitters would be responsible in the first instance for the accuracy of the catalog information that they submit electronically.

Model recommendation:

SongSplits Solutions LLC is an information technology company that currently is eliminating the friction of licensing digital media, quickly becoming the most important step after the creation of creative work.

*SongSplits data technology is a copyright management solution incentivized with the offering of **free** real-time technology for creators to manage, verify, confirm, communicate and record their song's ownership declarations online and in print.*

Additional recordation features include online catalog and contact management.

Why?

The current method for managing the data that is required for licensing is an unstructured and time-intensive in the process of telephone calls, emails and circulating paper documents.

This is an inefficient, high-cost business practice in the music and media industries that produces limited data, and often-costly results.

SongSplits has effectively met the challenges of time, cost, fragmented data across documents, disconnected databases and emails because additional revenue is never generated do to missing data that prevents licensing.

How?

Once registered, creators identify each other as collaborators in their work, each creator is notified instantly via email and provided the opportunity to confirm, update or dispute his/her works interests.

Confirmed and approved ownership splits are routed to stakeholders, managers, publishers, attorneys and performance rights societies. Disputes are transparent among creators to allow them to find agreeable terms. All verified splits are available in real-time to subscribed parties via their SongSplits dashboards.

SongSplits technology increases remitter accuracy for remitters who currently might be worried that inadvertent errors would go uncorrected, electronic submission of information allows for a variety of types of guidance that greatly reduces the number of inaccuracies entering the copyright office.

SongSplits is a proven model, network of content creators and verified data that the industry relies on as a solution to these challenges:

- 1. User/copyright data technology adoption*
- 2. User/creator verification*
- 3. Enterprise data management for quality control*

This remitter responsible model supports 30,000+ global creators who currently manage their SongSplits digital dashboard and catalog of work including all co-creator information and verifications.

Using SongSplits technology, remitters have the opportunity to communicate ownership to all co-creators and stakeholders via email or print.

Opted-in, linked information provided by the remitter to the copyright office (as one of their stakeholders) would provide:

- 1. Remitter accuracy in digital management*
- 2. Real-time ownership results*
- 3. Formatted technology for user efficiency*
- 4. Cost-efficiency as this model is free for creators*
- 5. Electronic remitter signatures, currently required for each creator to claim and approve their ownership of each created work*

The management of crucial opted-in remitter information can be entered once, and digitally updated in real-time by co-creators including their names and addresses. For remitters, access of that stored information when recording subsequent documents, is easily ensured by the digital consistency between creators of their catalog entries.

SongSplits Solutions LLC copyright-focused model ideally supports a new creator value chain connecting all stakeholders and universal copyright communications from creative to copyright, licensing to publishing thus bringing greater digital efficiency to the growth of the US copyright's burgeoning economy.

2. Structured Electronic Documents. The Copyright Office is also considering whether to adopt standards for and accept structured electronic documents in which tagged indexing or cataloging information is integrated into the documents themselves. Such documents contain several linked layers or folders.

SongSplits Solutions LLC currently provides [SongSplits](#) as a simple, structured electronic technology for more than 30,000 creators with 13M+ songs in its database.

SongSplits operates the end-to-end platform to definitively capture, confirm, display and distribute copyright information from any web-enabled device: directly from the creators.

Through an intuitive interface, creators can add and confirm information all within a few clicks. Meanwhile, the administrative managers, publishers, attorneys and societies that work on behalf of these writers can access real-time, synchronized data, which allows them to work more efficiently.

This proven technology-enabled structure reduces the time, costs and the margin of error of managing copyright information on an individual basis for all stakeholders in the process and provides a uniform data structure for copyright holders and media industries to rely upon.

Digital communications between copyright holders and their stakeholders allow creative businesses to do what they do best, manage the interests of their creators.

3. Linking of Document Records to Registration Records. The Office is considering whether it should link records of documents pertaining to registered works to the registration records for those works. In particular, it is seeking comments on whether it should require by regulation that document remitters provide registration numbers in a standardized format for all registered works to which their documents pertain.

With remitters using SongSplits as their digital solution, over 60% of claimed ownership interests are 100% approved and syndicated to stakeholders in the first 24 hours of digital communications for a viral loop.

SongSplits goal for creators is to reduce the dependency of paper and all the clerical errors that go with it. This technology-enabled approach reduces the time, costs and the margin of error of managing copyright information on an individual basis for all stakeholders in the process and provides a uniform data structure for copyright holders and media industries to rely upon.

4. Use of Standard Identifiers and Other Metadata Standards. The Office is considering whether it should adopt incentives or requirements with respect to the provision of standard identifiers, such as International Standard Musical Work Codes and International Standard Audiovisual Numbers, in recorded documents. Comments are welcome regarding the degree to which the provision of such identifiers would aid in uniquely identifying affected works and in linking Copyright Office Catalog information about works to other sources of information about such works. Comments are also welcome on whether such incentives or requirements might be more appropriate or helpful with regard to some types of works than with regard to others. The Office is also considering whether it should adopt or ensure compatibility and welcomes comments on the utility of metadata standards and on particular metadata projects that it should consider.

***Free** creator access to real-time copyright management technology is the incentive to claim owner representation and the organization of their creative catalogs. Creative industries with the opportunity to adapt to this copyright platform for creators include: music, media, books, film and more. Numerous customized data management and legacy capabilities are feasible.*

5. Additional Statutory Incentives to Record Documents Pertaining to Copyright. A number of academic commentators have proposed that Congress create additional incentives or requirements for recording documents pertaining to copyright. Congress could reinstate the requirement, dropped in 1989, of recording all documents in the chain of title from the author to the current owner of copyright as a precondition of filing in infringement lawsuit. It could also condition the provision of certain remedies, such as statutory damages and attorneys' fees, on the recordation of any and all documents that transferred ownership of works to those eligible to sue for infringement at the time infringement commenced. Perhaps the broadest proposal is to provide that no transfer of a copyright interest will be valid unless a note or memorandum of that transfer is recorded with sufficient description of the interest granted and identification of the parties from and to whom the interest is granted. The Copyright Office is seeking comment on the benefits and costs of such proposals, and on their compatibility with the treaty commitments of the United States.

*SongSplits Solutions LLC has created the world's first **free** cloud-based ownership platform for creators at www.songsplits.com, a simple and universal digital process for global creators to declare, validate, transfer, communicate and electronically record their ownership of created works to ease the friction in licensing in 30 countries around the globe.*

This active digital recordation model provides all creators with the ability to transfer copyright interest and percentages within minutes, easily granting and identifying parties from and to whom the interest is granted via electronic signature therefore reducing copyrights infringements and orphaned works.