

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

In the Matter of:

Remedies for Small Copyright Claims

Docket No. 2011-10

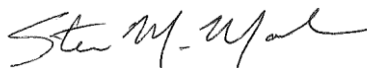
**COMMENTS OF RECORDING INDUSTRY OF AMERICA (RIAA) AND  
AMERICAN ASSOCIATION OF INDEPENDENT MUSIC (A2IM)**

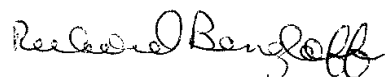
At the request of Congress, the U.S. Copyright Office (the “Office”) has announced a study to “assess whether and, if so, how the current legal system hinders or prevents copyright owners from pursuing copyright infringement claims that have a relatively small economic value (‘small copyright claims’); and recommend potential changes in administrative, regulatory and statutory authority to improve the adjudication of these small copyright claims.”

As a general matter, we can see how there might be potential benefits and drawbacks to a streamlined system for dealing with small copyright claims. The issue, however, is extremely complicated. Whether a workable system can be created depends greatly on the scope of the system and how it would be implemented.

Because the specific details of any small claims procedure require careful thought, RIAA and A2IM have chosen to delay submitting any substantive comments until such time as there are one or more specific proposals upon which to comment. As the owners of millions of copyrighted works, our collective members care deeply about the means by which copyrights can be enforced. If, as a result of the instant study, the Office determines that some sort of streamlined system is desirable for small copyright claims, we wish to be involved in the development of that system. To that end, we look forward to participation in any roundtables or hearings the Office holds on this topic and to responding to future Notices of Inquiry concerning the topic as well.

Dated: January 17, 2012

By:   
\_\_\_\_\_  
Steven Marks  
Executive Vice President and General Counsel  
Recording Industry Association of America (RIAA)

By:   
\_\_\_\_\_  
Richard Bengloff  
President  
American Association of Independent Music (A2IM)