

VAPAC Music Publishing, Inc.

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April 12, 2011

Re: Copyright Protection for Pre-1972 Sound Recordings

Dear Sir or Madam:

Thank you for requesting comments regarding this crucial missing protection. As a music publisher who enjoys protection for our song writers under US Copyright Law, we also own approximately 800 sound recordings that do not share the same protection under federal law. This leaves our protection to be interpreted by various states where potential infringements may occur. It is difficult and cost prohibitive for us to proactively plan for any potential infringements state by state. This added coverage would make the protection uniform for Pre-1972 sound recordings and it would be very welcomed and appreciated.

Sincerely,

Eric D. Leaner, Vice President and Treasurer