



Congress of the United States
House of Representatives
Washington, DC 20515-4905

May 21, 2026

Ms. Shira Perlmutter
Register of Copyrights
United States Copyright Office
101 Independence Ave SE
Washington, D.C. 20559

Dear Register Perlmutter:

I respectfully request the U.S. Copyright Office examine the contributory effects of artificial intelligence (AI) in music streaming fraud, and the resulting effect on the music industry.

According to the International Federation of the Phonographic Industry (IFPI), revenue for global recorded music exceeded \$29 billion in 2024.¹ Subscription streaming was the key driver of that growth, with more than 750 million paid subscription streaming accounts generating 69% of total recorded music revenues.² Subscription streaming has also led to record payments to music artists and creators, with Spotify distributing more than \$11 billion in 2025 alone.³ But while digital streaming has been fueling growth in the music industry, it may also be contributing to an increase in AI-related streaming fraud,⁴ which has the potential to harm business models across the music ecosystem.

Generative AI platforms have the capability to generate millions of songs per day that serve as a pipeline to digital streaming.⁵ For example, streaming platform Deezer reported in April 2026

¹ IFPI, *Amidst Highly Competitive Market, Global Recorded Music Revenues Grew 4.8% in 2024*, IFPI (2024), <https://www.ifpi.org/ifpi-amidst-highly-competitive-market-global-recorded-music-revenues-grew-4-8-in-2024/>.

² *Id.*

³ Ethan Millman, *Spotify Paid Out \$11B in Royalties in 2025*, *Hollywood Reporter* (Jan. 2026), <https://www.hollywoodreporter.com/music/music-industry-news/spotify-paid-out-11b-royalties-music-industry-2025-1236486656/>.

⁴ Music Fights Fraud Alliance, ("Streaming fraud refers to the illegitimate practice of using deceptive, inappropriate, or unpermitted methods to artificially increase the number of streams a song or album receives in order to skew public perception of notoriety, to gain financial rewards, or any other benefit(s) not otherwise obtained by legitimate means.") <https://musicfightsfraud.com/resources/streaming-fraud-101>

⁵ Virginie Berger, *How AI-Generated Music Became a \$4 Billion Fraud Machine*, *Forbes* (May 2026), ("The supply side of that [fraud] operation runs on tools like Suno. Two million paid subscribers generating seven million songs every single day, the equivalent of Spotify's entire historical catalog every two weeks, according to internal investor documents obtained by Billboard.") <https://www.forbes.com/sites/virginieberger/2026/05/05/how-ai-generated-music-became-a-4-billion-fraud-machine/>.

that nearly 44% of its daily music uploads were AI-generated.⁶ These songs can often compete with, or exceed, the likes popular artists. For example, in 2025, an AI-generated country song, “Walk my Walk,” made history by reaching the top spot on Billboard's Country Digital Song Sales chart.⁷ Other AI-generated works have similarly achieved popularity, generating millions of plays across various streaming platforms.⁸

While there is nothing inherently wrong with using AI as a creative tool in music development, or the organic growth of AI-generated music, specifically, generative AI can serve as a catalyst for criminals to perpetrate streaming fraud.⁹ Deezer has found, for example, that “up to 85% of the streams generated by fully AI-generated tracks” in 2025 were found to be fraudulent.¹⁰ Similarly, Apple Music reportedly demonetized two billion fraudulent streams in 2025 alone.¹¹ In March, the Department of Justice successfully prosecuted a man who generated millions of fraudulent streams using AI-generated songs.¹²

Streaming fraud, exacerbated by generative AI, can have profound impacts across the music ecosystem. Most notably, streaming fraud affects the distribution of sound recording, performance, and mechanical royalties through the dilution of legitimate musical works. When AI-generated outputs compete against human-made works, they divert money from a finite royalty pool that would otherwise be distributed to actual rights holders. If done fraudulently by bad actors deploying bots or other forms of manipulation, it represents a clear theft of the royalty pool.

In the DOJ’s successful prosecution in the Southern District of New York, for example, the defendant generated more than \$8 million in fraudulent royalties through “hundreds of thousands of AI-generated songs.”¹³ This is just one such example. A 2024 study by CISAC and PMP

⁶ Deezer, *AI-Generated Tracks Represent 44% of New Uploaded Music*, Deezer Newsroom (Apr. 2026), <https://newsroom-deezer.com/2026/04/ai-generated-tracks-represent-44-of-new-uploaded-music/>.

⁷ GMA Team, *AI-Generated Country Song Tops Billboard’s Country Digital Song Sales Chart*, ABC News (Nov. 2025), <https://abcnews.com/GMA/Culture/ai-generated-country-song-topping-billboards-country-digital/story?id=127445549>.

⁸ Conor Murray, *The No. 1 Song on US iTunes—and Several Other Countries—is AI-Generated*, Forbes (Apr. 2026), <https://www.forbes.com/sites/conormurray/2026/04/17/the-no-1-song-on-us-itunes-and-several-other-countries-is-ai-generated/>.

⁹ Clovis McEvoy, *How AI-generated songs are fueling the rise of streaming farms*, WIPO Magazine (May 2025), <https://www.wipo.int/en/web/wipo-magazine/articles/how-ai-generated-songs-are-fueling-the-rise-of-streaming-farms-74310>.

¹⁰ Deezer. *Supra* note 5.

¹¹ Ethan Millman, *A Chat with Apple’s Music Chief on Streaming Fraud and Why Bad Bunny Is a “Great” Super Bowl Choice*, The Hollywood Reporter (Jan. 2026), <https://www.hollywoodreporter.com/music/music-industry-news/apple-music-oliver-schusser-streaming-fraud-bad-bunny-1236488459/>.

¹² U.S. Dep’t of Justice, *North Carolina Man Pleads Guilty to Music Streaming Fraud Aided by Artificial Intelligence*, DOJ (Mar. 2026), <https://www.justice.gov/usao-sdny/pr/north-carolina-man-pleads-guilty-music-streaming-fraud-aided-artificial-intelligence-0>.

¹³ *Id.*

Strategy on the economic impact of Generative AI in the music industry found nearly 25% of creators' revenues could be at risk by 2028, representing a potential loss of over \$4 billion,¹⁴ and potentially incentivizing cybercriminals to exploit the digital supply chain. Compound this with other industry actions to reduce the percentage of royalties owed to songwriters and publishers, such as Spotify's recent decision to reclassify its premium subscription plan as a "bundle,"¹⁵ and the royalty pool left to legitimate creators is severely weakened.

Streaming fraud can have residual effects as well by distorting the data artists and venues use to make key business decisions. Streaming data, for example, can be a contributing factor in artists choosing when and where to tour.¹⁶ Many artists lean on Spotify for Artists data analytics to determine which cities have the highest concentrations of fans,¹⁷ thereby informing decisions like venue size and digital advertising. If that data is manipulated through artificial streaming, it can have severe consequences not just on the touring artists, but also on the venues who derive revenue through secondary sales (e.g. food and beverage, merchandise, parking, etc.).

Artificial streaming data can also affect how music labels make decisions about which artists to sign. Many of today's biggest artists were discovered through streaming platforms like SoundCloud and TikTok. Justin Bieber, famously, was discovered on YouTube before being signed to a record deal.¹⁸ Labels use streaming data to identify trends in music that inform which genres may be gaining popularity. By distorting that data, we may be depriving up-and-coming artists from gaining notoriety.

Finally, streaming fraud can affect the rate at which platforms and venues pay for music licensing. Performing Rights Organizations (PROs) can use streaming data to identify trends or verify popularity of certain songs or artists, which may then be used as supporting evidence for higher licensing rates. Further, in 2025, three major North American PROs announced they will accept "musical compositions partially generated using artificial intelligence (AI) tools," and that such works "will now be included as part of the full repertoires licensed by each society."¹⁹ This means AI-generated music, which may or may not hold a valid copyright, and which your office

¹⁴ CISAC, *Global Economic Study Shows Human Creators' Future at Risk from Generative AI*, CISAC (2024), <https://www.cisac.org/Newsroom/news-releases/global-economic-study-shows-human-creators-future-risk-generative-ai>.

¹⁵ Jem Aswad, *Spotify Wins Lawsuit Over Bundling and Royalties*, *Variety* (Jan. 2025), <https://variety.com/2025/music/news/spotify-wins-lawsuit-bundling-royalties-1236289823/>.

¹⁶ Eric Frankenberg, *When Artists Tour, Their Streaming Numbers Increase. Which Genres See the Biggest Gains?*, *Billboard* (Mar. 2024), <https://www.billboard.com/pro/touring-streaming-effect-artists-genres-gain-most/>.

¹⁷ Spotify, *Are You Really Tour-Ready?*, Spotify for Artists Blog (Nov. 2018), <https://artists.spotify.com/blog/are-you-really-tour-ready>.

¹⁸ *Justin Bieber: From YouTube to global superstar*, CNN Entertainment (Jun. 2022), <https://edition.cnn.com/2019/03/26/entertainment/gallery/justin-bieber>.

¹⁹ Press Release, Broadcast Music Inc., *ASCAP, BMI and SOCAN Announce Alignment on AI Registration Policies* (Oct. 2025), <https://www.bmi.com/press/entry/594971>.

has already advised is not entitled to a royalty payment,²⁰ can now be a contributing factor to the price of a PROs “blanket” license.

For these reasons and more, I request that the Copyright Office examine the prevalence of streaming fraud across digital platforms and how it may be affecting the music industry as a whole. I would also request the Copyright Office examine, specifically, the effects of AI-generated streaming fraud on the licensing and distribution of sound recording, performance and mechanical royalties.

Thank you for your attention to this matter. Please contact my office should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Scott Fitzgerald". The signature is fluid and cursive, with the first name "Scott" and last name "Fitzgerald" clearly distinguishable.

Scott Fitzgerald
Member of Congress

²⁰ Letter from Suzanne Wilson, U.S. Copyright Office, to Kris Ahrend, Mechanical Licensing Collective (Apr. 2023), <https://www.copyright.gov/ai/USCO-Guidance-Letter-to-The-MLC-Letter-on-AI-Created-Works.pdf>.