

To whom it may concern,

I am writing this comment in regards to the issue of music licensing, specifically as it relates to radio broadcasting.

It has been repeated many times, that one of the reasons radio stations should NOT be subjected to an additional tax, is that by playing the music, they are essentially giving the performers of said music "free advertising". This is true. By playing their music, the radio stations are, in fact, providing them with a VERY VALUABLE service: Exposure.

The present music licensing system has significant flaws, as well. I spent nearly two decades as the music director of a local AM radio station that programmed less than ten percent of its airtime with music.

In that time, I was aware of several local artists and writers, whose music was played fairly often on the station. They received a check from the Performance Rights Organization they were affiliated with, of single-digit dollars. This, after said station had paid thousands to the P.R.O. and had even been providing logs of the music played.

It is my educated opinion that these writers would certainly have earned much more than a single-digit dollar amount, had this music licensing system been more fair in its distribution of funds. (Especially for lesser-known artists.) In many cases, these artists would gladly forego such checks, in light of the

fact that the radio station is boosting sales of their music by playing it on the air, AKA: free advertising.

With the advent of all-digital music storage, and the wide adoption of "Music-on-Hard-Drive" systems by a vast majority of broadcasters, this is an ideal time to make such a system work to everyone's benefit. Such systems can readily and easily be programmed to provide very precise logs of music airplay.

This would benefit the smaller stations that play a limited amount of music by lowering the fees they must pay, while simultaneously increasing the payout to the individuals who most deserve it; the writers whose music is actually being played. (Especially LOCAL talent.) There should also be methods where writers/artists can forgo receiving royalty fees from radio stations, in exchange for those stations playing their music on the air. As a result, those stations fees must be reduced accordingly.

It is my hope that a system can be devised which eliminates the "middle men" from the equation, allowing MORE of the collected fees to actually reach the writers/artists while also lowering the costs to small radio broadcasters.

Internet "broadcasting" is another matter where the fees can be prohibitive for those who are interested in providing a "niche" music format to a somewhat limited audience. Such fees make "hobbyist" Internet radio unreachable to most individuals.

The rules on Internet "Radio" are also exceptionally burdensome, especially to

"hobbyist" stations. The mandates against playing more than a handful of songs by the same artist within a fairly large window of time, is just unnecessary. Most hobbyist style 'Netcasters would not be running high fidelity streams. Because the audio fidelity would be limited, recording such low-quality music for the sake of piracy, would be very unlikely. Any Internet station with a maximum audience of 100 or less, using 32Kbps or less should be subject to only the most minimal fees, and no restrictions on the sequence of music or artists played.

Submitted as a member of the Public, with professional ties,

William Barnett III