

Dear Copyright Office:

Thank you for the opportunity to once again, make comments on the music licensing and the future of our industry as a whole. For over 50 years, ABKCO Music and Records Inc, one of the world's leading independent entertainment companies, has been home to an iconic catalog that includes compositions and recordings by Sam Cooke, The Rolling Stones, Bobby Womack, Eric Burdon, The Animals, Herman's Hermits, Marianne Faithfull, The Kinks as well as the Cameo Parkway masters by such artists as Chubby Checker, Bobby Rydell, Clint Eastwood, The Dovells, ? & The Mysterians, The Tymes and Dee Dee Sharp.

We have been able to reflect on the previous submissions and roundtable discussions and have found that while there are still some that hold adverse positions, on the whole, there are many areas on which we can all agree.

- 1) Regardless of whether you are a songwriter, artist, publisher or record company all rates should be based on fair market values in a willing buyer, willing seller environment.
- 2) Licensing needs to be more "user-friendly" in several ways:
 - a) The establishment of (or the extension of existing) official designated agents that are authorized to license like-minded creators and their representatives;
 - b) The ability of these designated agents to issue blanket agreements and bundle rights in agreements where applicable; and
 - c) The transparency of ownership and income shares, either through a central database or designated agents
- 3) Royalties should be standardized to include quicker payments, more details and guidelines should be set which include audit provisions. Royalties should be paid directly through designated agents to allow for consolidation.

In preparing your recommendations we would like you to continue to keep in mind that independent creators or owners must be protected from the predatory methods employed by the corporate conglomerates (whether within our industry or outside) in order to ensure the future of this industry both financially and creatively. As a small family owned business, we depend upon the fairness of rights negotiations and the ability to choose our licensing methods to sustain our artists, writers and our company's livelihood.

Sincerely,

ABKCO Music & Records, Inc.