Public Comment to the U.S. Copyright Office

To Whom It May Concern at the U.S. Copyright Office,

As both an independent songwriter and publisher, I respectfully submit this comment regarding the Copyright Office's review of regulatory oversight over Performing Rights Organizations (PROs) such as ASCAP, BMI, SESAC, and GMR.

This decision is not just a policy matter—it directly impacts how independent creators and rights holders like myself can sustain our livelihoods in today's evolving music economy.

I urge the Copyright Office to ensure that any future regulatory changes protect the interests of independent writers and publishers. Without thoughtful safeguards, reducing oversight could shift even more power into the hands of major corporations, platforms, and multinational publishers—further marginalizing smaller voices and limiting our ability to compete, earn fairly, and innovate.

As an independent publisher, I see firsthand how delays in royalty payments, a lack of transparency in licensing deals, and limited access to negotiation hurt the very creators who fuel this industry. Regulation, when done right, helps level the playing field and ensures accountability across the system.

I advocate for a regulatory approach that guarantees:
- Fair and timely royalty distributions
- Transparent and accessible licensing practices
- Equal representation and negotiation opportunities for independent creators and publishers
- A balanced ecosystem where creativity—not just capital—drives value

This moment is critical. I ask the Copyright Office to center independent songwriters and publishers in its decision, not just the corporations with the loudest voices.

Thank you for the opportunity to provide input.

Sincerely,
Pierre Richards
Independent Songwriter & Publisher
PackTown Entertainment