

Road Canon Music, LLC

10414 SW 238th St. Vashon, WA 98070

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**Tanya M. Sandros
Deputy General Counsel
US Copyright Office
101 Independence Ave. SE
Washington, DC 20559-6000
Fax 202-252-3423**

Dear Ms Sandros-

I have made my living as a professional songwriter for more than forty years. As a songwriter I am at the bottom of the figurative totem pole but I am the strength that upholds it. I am concerned that the new regulations for digital downloading and accounting will prove a greater benefit to the companies distributing my songs electronically than they will to me. As a songwriter I have no idea whether I am being paid correctly by any digital service and I am not allowed to audit them even though they are allowed to distribute my songs.

I routinely receive NOI's that are late asking me to log into a website to see if I am owed money or how much I am owed. When I go to the website I am asked to sign a click-through agreement that makes significant changes to the few statutory rights that I have. I have no control over this process and am prevented from seeing the balances for owed monies without signing these agreements. This is not fair and should not be legal.

If, and when, I do get certified statements from a CPA I have no way of knowing if the CPA ever looked at my earnings or if there are any "black box" earnings to which I am entitled. How can this be a fair and balanced system?

There is a deep irony in all this: How can services who have never complied with the law get protection of the laws they have evaded?

As a songwriter and music publisher I, and all the other songwriters and publishers, are not asking for exceptional treatment, only fair, balance, and honest accountings of the monies which we have earned and are owed.

I thank you for your attention to these issues.

Sincerely,

**Danny O'Keefe
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