I have assembled some major points that I believe should be addressed relative to the issue of reduced royalty payments, collection thereof and the continued mission of corporate entities attempting to further their own financial gains at the expense of the people who wrote and produced the content that enables them to amass fortunes at the expense of writers, composers and artists. Please consider the following points.

- 1. No Audit: 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. This is untenable.
- 2. Publishers Clearing House: I routinely receive a "notice of intention to use" my work that is always late. This violates the basic rule of statutory licensing. The "NOI" I receive comes with a letter 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 I have. This is the worst kind of trickery and is worse than the worst direct mail campaigns because I can always throw away the junk mail. This trickery involves my life's work!
- 3. Black Box: If I am lucky enough to get a certified statement 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 that I'm entitled to. Given that I get no certifications and no audits, there's no telling how much money should have been paid that wasn't.
- 4. Don't Protect Scofflaws: You cannot allow services who have never complied with the law to get protection of the laws they have evaded.

The compulsory license accounting provisions should be enhanced to provide copyright

Owners with more information and oversight with respect to the use of their musical works. This is
especially true with respect to digital distribution in which millions of reproductions and streams can
take place in hours or days with virtually no other paper trail to support accountings in a business
that has been notorious for its creative accounting practices at the expense of the artists and
songwriters. Also, any payments made electronically to the copyright owner should NOT constitute
acceptance or approval by the copyright owner of any royalty accounting associated with such payment
and all rights of copyright owners' should be considered reserved.

Sincerely,

Andy Steinborn

Tajo-One, Inc.