

August 10, 2026

Emily Chapuis
General Counsel and Associate Register of Copyrights
Library of Congress
U.S. Copyright Office
101 Independence Avenue S.E.
Washington, DC 20559-6000

Re: Summary of *ex parte* meeting between the National Association of REALTORS®, Council of Multiple Listing Services, Copyright Alliance, and the U.S. Copyright Office on the NPRM relating to Copyright Office Fees

Dear Ms. Chapuis,

This letter summarizes the August 6, 2026 *ex parte* meeting (“August 6 Meeting”) that occurred via Zoom videoconference between representatives from the National Association of REALTORS® (“NAR”) and representatives of the U.S. Copyright Office (“Copyright Office”) regarding the [Notice of Proposed Rulemaking](#) (“NPRM”) relating to Copyright Office Fees [Docket No. 2026-2] dated March 20, 2026. NAR was joined by representatives from the Council of Multiple Listing Service (CMLS), the American Continental Group (“ACG”), and Copyright Alliance at the meeting.

Representatives participating in the August 6 Meeting on behalf of NAR were Austin Perez, Senior Policy Advisor, Susan Frederick, Director of Federal Technology Policy, Leslie Nettleford-Freeman, Associate General Counsel, VP Legal Affairs & Brand Protection, and Ryan Rusbuldt, Director of Government Advocacy and Operations. The representative participating on behalf of the CMLS was Mitch Skinner, CMLS advisor and Attorney at Law. Representatives participating on behalf of ACG Advocacy included Manus Cooney, Managing Partner, and Sarah Kohn, Junior Partner. Representatives participating on behalf of the Copyright Alliance were Keith Kupferschmid, CEO, and Rachel Kim, VP, Legal Policy and Copyright Counsel. Representatives participating in the meeting on behalf of the Copyright Office were Emily Chapuis, General Counsel and Associate Register of Copyrights, Jalyce Mangum, Assistant General Counsel, Maria Strong, Associate Register of Copyrights and Director of Policy and International Affairs, Danielle Johnson, Counsel, Erik Bertin, Acting Associate Register of Copyrights and Director of Registration Policy and Practice, and Megan Somers, Assistant Chief of the Literary Division.

NAR thanked the Copyright Office for the opportunity to meet and discuss concerns regarding the proposed copyright fee schedule. NAR began by providing an overview of the Multiple Listing Services (“MLS”) and explaining their role in compiling, organizing, and distributing real estate listing information that supports homebuyers, sellers, and real estate professionals. NAR also described why copyright registration is important to MLSs as a tool for protecting listing content from unauthorized copying and misuse.

NAR expressed concern about the proposed fee increase for the group registration option for non-photographic databases and requested that the Copyright Office not finalize the increase until stakeholders have an opportunity to address outstanding policy and modernization issues. NAR explained that MLSs frequently rely on this registration option and, because MLS databases are continuously updated, must register multiple times each year.

NAR stressed that MLS are not large corporations that can easily absorb significant cost increases; rather, they are generally small organizations operated by local nonprofits that rely on subscription fees paid by real estate professionals. As a result, increased registration costs ultimately flow through to real estate professionals, most of whom are small businesses and sole proprietors. NAR also noted that the proposed increase would exceed the Copyright Office’s reported actual processing cost for the registration and would effectively require MLSs to subsidize the lower fees for other users of the copyright system.

NAR also noted that, despite the increasing costs associated with paper filings, the Copyright Office has not yet provided MLSs with an electronic registration option, leaving MLSs with no practical alternative but to submit paper-based applications. NAR expressed the desire for an electronic filing option that would reduce burdensome costs and process inefficiencies for both the Copyright Office and MLSs.

Finally, NAR noted that MLS registrations have declined following prior fee increases and expressed a willingness to work collaboratively with the Copyright Office to identify a reasonable and workable path forward.

The meeting concluded with NAR, CMLS, and the Copyright Alliance reiterating that it and its members remain ready and available to engage in further conversations with the Copyright Office to consider changes, updates, and modernization of the registration system to ensure the copyright registration system works for all copyright owners including the MLSs.

Sincerely,

/s/

Austin Perez

Senior Policy Representative

National Association of REALTORS®

