



Summary of Ex Parte Discussion of August 18, 2024

August 25, 2025

Via Email

John Riley
United States Copyright Office
Library of Congress
101 Independence Ave. SE
Washington, DC 20559-6000

Re: Summary of the August 18, 2025 *Ex Parte* between the United States Copyright Office and Songwriters of North America

Dear Mr. Riley:

This letter summarizes the August 20, 2025 *ex parte* between representatives of the United States Copyright Office (“USCO”) and Songwriters of North America (“SONA”) regarding the ongoing Periodic Review of the Designations of the Mechanical Licensing Collective and Digital Licensee Coordinator.

The persons participating in the were: John Riley, Jalyce Mangum, and Michael Druckman from USCO and Michelle Lewis, Erin McAnally, and Linda Bloss-Baum from SONA.

SONA thanks the USCO for its time and attention in meeting with us. The following summarizes our discussion.

SONA began the discussion by restating that we believe that The Mechanical Licensing Collective (MLC) should be redesignated by the U.S. Copyright Office for the next 5 years with certain recommendations and conditions. SONA also expressed strong support of the USCO’s regulatory authority with regard to the MLC and reiterated other main points from our May 2024 comments, including:

- We strongly agree with The MLC’s continued decision to delay the first market share distribution until more extensive efforts to match as many uses and works as possible have been made. We believe that technological solutions, educational and marketing efforts and time are required in order to properly reach all stakeholders who might be eligible for unclaimed royalties before a distribution.

- SONA commends the continued development of technological solutions like a Songwriter Portal and mechanisms for Songwriters to identify, cure and/or call out issues with their own data to their publishers. These tools are still in development phases and so SONA will work in partnership with the MLC to provide feedback and, once ready, to help amplify the existence of the tools as well as help educate on their functionality.
- In our initial comments we stated we were encouraged to see The MLC incorporate outside vendors to create the Supplemental Matching Network. SONA has not seen data to indicate whether/how the outside vendors to the MLC are improving match rates. As The MLC's regulatory authority, the U.S. Copyright Office should stay engaged on the progress of these outside agencies' engagements, including a process by which their efforts may be measured.
- When asked what specific metrics may be used to evaluate ample matching prior to market share distribution, SONA said that there must be overall general trust in a fair and transparent MLC process before any distributions are allowed.
- Consistent with their public comments, regarding governance, SONA believes that songwriters would benefit from the diversification and rotation of the designated Songwriter Organization non-voting board seat. SONA asked the USCO for clarification regarding eligibility, nominating process, term length, and term limits. In an effort to to advance The MLC's mission of facilitating fair and transparent licensing and royalty distribution for music creators and rights holders, SONA believes that it is healthy for there to be a fair rotation and diversity of viewpoints about, and responsibility for, the overarching governing body of The MLC.

No new documents were presented beyond previously submitted written comments, as per Office guidelines. Informal communications in this meeting are intended to supplement, not substitute for, our official written comments from May, 2024.

SONA thanks the USCO for its continued efforts to ensure fairness, accuracy and efficiency for songwriters in connection with the fulfillment by the MLC of its statutory duties. Such oversight is sincerely appreciated. Should the Office have any additional questions, we stand ready to provide further clarification.

Respectfully Submitted,



Erin McAnally
Executive Director
Songwriters of North America ("SONA")