

June 4, 2019

BY EMAIL

Steve Ruwe
Assistant General Counsel
United States Copyright Office
Library of Congress
101 Independence Avenue SE
Washington, D.C. 20559-6000
sruwe@copyright.gov

Dear Mr. Ruwe:

I write on behalf of Digital Licensee Coordinator, Inc. (“DLC, Inc.”) to follow up on our May 29, 2019 meeting, and to thank you for the opportunity to discuss DLC, Inc.’s submission for designation as the Digital Licensee Coordinator under Section 115 of the U.S. Copyright Act, in response to the Copyright Office’s Request for Information, 83 Fed. Reg. 65,747 (Dec. 21, 2018).

The following people were present on behalf of DLC, Inc.: Ellen Schrantz of Amazon, on behalf of the DLC, Inc. Board Chair James Duffett-Smith, Board Secretary Lisa Selden of Spotify, Board Treasurer Sarah Rosenbaum of Google, Board Member Cynthia Greer of Pandora, Board Member Nick Williamson of Apple, Garrett Levin, of the Digital Media Association, as interim representative of DLC, Inc., and Allison Stillman of Mayer Brown and Sy Damle of Latham & Watkins, as outside counsel to DLC, Inc. Karyn Temple, Regan Smith, Steve Ruwe, Jason Sloan, Kevin Amer, and John Riley attended on behalf of the Copyright Office. This letter summarizes our discussion.

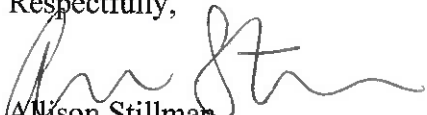
1. We introduced the DLC, Inc. Board Members and described their specific operational expertise and experience with the current mechanical licensing system, and with music data. We explained that the Board Members collectively have the expertise to fulfill the responsibilities that the statute places on the designated digital licensee coordinator, including with respect to shared responsibilities with the designated mechanical licensee coordinator.
2. We discussed some of the challenges with the current mechanical licensing system with respect to data and payments, and the opportunities for improvements. As an example,

we noted the benefits that would accrue to the system if standard identifiers were issued at the time songs were released.

3. You asked specifically about the DLC's role in educational efforts for songwriters. We discussed how the DLC intends to collaborate with the MLC, and we discussed some ways that we can involve the Copyright Office in those efforts.
4. We discussed how DLC, Inc. intends to grow membership to include other digital licensees. We explained the various ways that DLC, Inc. intends to encourage membership and participation of smaller licensees and new entrants, including the tiered membership dues system established in the by-laws. We also noted that we are in discussions about an allocation methodology for the administrative assessment that will be equitable for smaller licensees. You asked how DLC, Inc. intends to represent non-members, and we explained that with the diversity of our membership, we will be cognizant of a broad range of issues that licensees face.
5. We discussed the ways in which the DLC and MLC will have to work together on operational issues, given the role of DLC-designated members on the MLC operations advisory committee and in negotiations for the administrative assessment. You asked for and we provided an update on conversations between DLC, Inc. and the candidates to be the MLC.

We agreed that we would follow-up, by separate letter, with additional detail regarding certain of the issues discussed, including: the appointment of representatives to the MLC board and operations advisory committee; education and outreach efforts in conjunction with the MLC; and representation of smaller licensees in DLC, Inc.'s corporate governance. We will follow-up further regarding these issues shortly, and appreciate the Copyright Office's consideration.

Respectfully,



Allison Stillman

CC: Regan A. Smith, General Counsel and Associate Register of Copyrights,
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