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January 31, 2017

The Honorable Bob Goodlatte
Chairman
House Judiciary Committee
Washington, DC 20515

The Honorable John Conyers, Jr.
Ranking Member
House Judiciary Committee
Washington, DC 20515

Dear Chairman Goodlatte and Ranking Member Conyers:

We write to provide the Committee with comments of iHeartMedia on your December 8, 2016 policy proposal, entitled "Reform of the U.S. Copyright Office." We understand that the National Association of Broadcasters and the MIC Coalition will also be filing comments, and we associate ourselves generally with those comments. These comments are intended to emphasize our individual company perspective on the issues raised in the policy proposal.

We reiterate our appreciation for the opportunity to continue to participate in the Committee's careful review of the state of copyright law. We share the Committee's goal of ensuring that the Copyright Office is structured appropriately and has the necessary resources to meet the dynamic challenges posed by advanced and ever evolving digital technology. As a company that is committed to, and has structured many transactions based upon, the belief that the 21st century music ecosystem can and should be a "win-win-win" for content creators, distributors and consumers, it is critical that the Copyright Office be equipped to respond innovatively and in a balanced fashion to the perspectives of these three major categories of stakeholders. In that spirit, we offer the following specific comments.

Copyright Office Structure – We believe that it makes sense to keep the Copyright Office within the Library of Congress as outlined in the policy proposal. It is consistent with the constitutional foundations of copyright law and should be conducive to balanced, fair and efficient administration.

Register of Copyrights – We support elevating the Register of Copyrights to a position that requires Senate confirmation as outlined in the policy proposal. That status befits the growing importance of copyright law to our nation's domestic and global economic strength. The confirmation process is an important means of increasing the likelihood that the Register of Copyrights appreciates fully the importance of balancing equitably the interests of all copyright stakeholders – owners, users and consumers – thereby serving the public. Although the current Librarian of Congress appears to be very much attuned to the centrality of this principle, we believe that the long term institutional role of the Copyright Office would be best served by Senate confirmation of the Register of Copyright.

Advisory Committees – We support the policy proposal's call for Copyright Office advisory committees. However, as the policy proposal notes, the makeup of these committees should "reflect a wide range of views and interests." A balancing of the interests of all stakeholders will best serve the mission of the Copyright Office.

IT Upgrade and Searchable Database – We support the creation of a publicly available, transparent, accurate and fully searchable database that includes both ownership *and* licensing information. We recommend that Congress define the requirements for a database in statute, clearly articulating its technical and operational requirements, and ensuring both copyright owners and users find it acceptable and supportive of their needs.

Small Claims – We do not oppose the establishment of a small claims procedure within the Copyright Office *so long as it is strictly voluntary for all participating parties*. Because the policy proposal calls for a procedure consistent with the Copyright Office report on this issue, we understand the policy proposal to support a strictly voluntary procedure as was outlined in the Copyright Office report.

We appreciate the opportunity to comment on the policy proposal, and we look forward to working with both of you to enact Copyright Office reform legislation. Please feel free to call on us whenever we can assist you in this process.

Sincerely,

Jessica Marventano
Senior Vice President, Government Affairs

cc: The Honorable Darrell Issa, Chairman
Subcommittee on Courts, Intellectual Property, and the Internet

The Honorable Jerrold Nadler, Ranking Member
Subcommittee on Courts, Intellectual Property, and the Internet