

**Section IV. Ensuring an Efficient Online Marketplace  
(A) (2) (a) The Complexity of Music Licensing**

Thank you for the opportunity to comment on these important matters.

As a long-time digital music entrepreneur (eMusic, TuneCore, eMfile) as well as a rightsholder (200+ active copyrights) and copyright advocate (MIT's Communications Futures Program), I applaud the Task Force's call for the simplification of music licensing. Much of the licensing complexity arises from legacy administrative practices.

The move of (digital) transmissions from a regulated broadcast environment to the largely-unregulated internet environment has made the former systems of copyright administration obsolete. Furthermore, the on-demand nature of the online environment has obviated the need for separation between sales and "broadcast". This important often-overlooked nuance also contributes to the difficulty with copyright administration in the online environment, as do existing laws and regulations.

The existing bifurcated system of rights administration needs to be consolidated to create online marketplace efficiency, but this consolidation should be left in the hands of the private sector. Government should support the necessary changes by easing legal and regulatory complexities for rightsholder organizations including ASCAP, BMI, SESAC, the NMPA, SoundExchange and the RIAA, with respect to anti-trust provisions, existing provisions of the DMCA and consent decrees.

The Task Force cites the GRD as an example of consolidation and simplification. There are other US-based efforts to consolidate and simplify rights administration, including eMfile's call for a US standards board which includes interoperability for combination with the GRD once GRD is technologically operational. Government should support such US-based efforts as they lead to a faster resolution for US-based organizations which, as representatives of the largest music market worldwide, can then facilitate completion of Global solutions such as the GRD.

Respectfully,

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