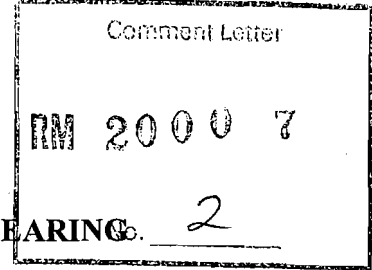


Before the
LIBRARY OF CONGRESS
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Washington, D.C.

Compulsory License for Making and
Distributing Phonorecords, Including Digital
Phonorecord Deliveries

Docket No. RM 2000-7



**COMMENTS OF
ROYALTYSHARE, INC.
AND REQUEST TO TESTIFY AT PUBLIC HEARING.**

On behalf of RoyaltyShare, Inc. (“RoyaltyShare”), we file these comments in response to the Copyright Office’s Notice of Proposed Rulemaking (“NPRM”) published in the Federal Register on July 16, 2008, 73 Fed. Reg. 40802, as amended on August 13, 2008, 73 Fed. Reg. 47113.

RoyaltyShare provides comprehensive catalog, content and revenue management services, including full royalty processing and content delivery, to record labels, music distributors and other publishers and aggregators of digital media content. The company therefore represents parties who rely upon the Section 115 compulsory license for making and distributing phonorecords and parties who receive royalties from such entities under the compulsory license. As such, RoyaltyShare has a significant interest in this rulemaking to amend and clarify the scope and application of the Section 115 compulsory license.

Above all, RoyaltyShare believes that the Copyright Office should amend and clarify the compulsory license to achieve the underlying objective of the license – to establish a fair, efficient and affordable license administration regime that allows and

facilitates record labels and music services to rely upon the compulsory license for making and distributing phonorecords and copyright owners to be paid for such uses.

RoyaltyShare reserves the right to provide additional comments during the reply phase of this NPRM and respectfully requests an opportunity to have its chief executive officer, Bob Kohn, participate in the public hearing scheduled for Friday, September 19, 2008. Mr. Kohn is a leading national expert on copyright law and the music industry and was an active participant in the Copyright Office's public hearing of June 15, 2007 on this very subject. His participation would provide an important perspective on the workings of the compulsory license as a representative of both musical work copyright owners and Section 115 licensees.

Respectfully submitted

ROYALTYSHARE, INC.

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August 28, 2008