Before the
UNITED STATES COPYRIGHT OFFICE
LIBRARY OF CONGRESS
Washington, D.C.

In the Matter of:

Notice and Recordkeeping for Use of Sound Recordings Under Statutory License	)	Docket No. RM 2002-1A

COMMENTS OF THE
AMERICAN FEDERATION OF MUSICIANS OF THE
UNITED STATES AND CANADA
AND
THE AMERICAN FEDERATION OF TELEVISION
AND RADIO ARTISTS

The American Federation of Musicians of the United States and Canada ("AFM") and the American Federation of Television and Radio Artists ("AFTRA") submit these comments in response to the Copyright Office's Notice of Proposed Rulemaking "on the requirements for giving copyright owners reasonable notice of the use of their works for sound recordings under statutory license and for how records of such use shall be kept and made available to copyright owners." Notice and Recordkeeping for Use of Sound Recordings Under Statutory License, 67 Fed. Reg. 5761 (Feb. 7, 2002)("the NPRM").

In the main, the AFM and AFTRA support the proposed rules set forth in the NPRM – in particular as they are streamlined by the modifications proposed in the Comments of the Recording Industry Association of America ("RIAA

Comments") filed on April 5, 2002 – because those rules appear to require records of use that are adequate to fulfill the important Congressional objective of compensating each featured recording artist for each use of his or her unique sound recordings, and that further will assist in fulfilling the equally important Congressional purpose of also compensating non-featured recording artists who have performed on sound recordings used by the services.

In one important respect, however, the AFM and AFTRA object to the proposed regulations set forth in the NPRM and in the RIAA Comments. The proposed regulations do not require the services to provide any information regarding the identity of non-featured musicians and vocalists on the sound recordings they use, even when the services are in possession of that information. As we explain below, the result is that under the proposed regulations non-featured artists are required to bear the entire burden of identifying artists on hundreds of thousands of unique sound recordings – an effort and expense that has the potential for dissipating all or nearly all of the small share of license fees that Congress intended to be distributed to them.

We propose that this situation be corrected by the addition of a new field on the proposed report of use that requires services to enter the names of all non-featured singers and musicians on each sound recording whenever the services are in possession of that information. For example, when a service possesses label copy containing non-featured artist names, or when it records information from a discography or other source which also contains non-

featured artist names, it should be required to record and report those names on the report of use.

In Part I below, we discuss the roles of the AFM and AFTRA related to these issues and set forth the interests of featured and non-featured recordings artists in this rulemaking proceeding. In Part II, we address an important underlying principle – that, contrary to the suggestion of some of the services, the services rather than the artists and copyright owners must bear the expense of collecting and providing information regarding their uses of sound recordings under the Section 114 and 112 licenses. In Part III, we discuss the adequacy of the proposed regulations to fulfill the Congressional objective of compensating featured artists, and the need for additional non-featured artist information to fulfill the Congressional purpose of compensating non-featured artists. Finally, in Part IV we respond to the Copyright Office's questions set forth in the NPRM.

I. Introduction

A. The Roles of the AFM and AFTRA

The AFM is an international labor organization composed of approximately 260 affiliated locals throughout the United States and Canada. The AFM and its locals represent approximately 110,000 professional musicians. Musicians represented by the AFM make their living by recording music for sound recordings, films, television, radio and commercial announcements, as well as by performing live music in concert halls, lounges, theaters, orchestra halls and every kind of large and small venue. AFM

members include many preeminent recording artists and live entertainers who earn significant incomes from record deals and live performances and who are star attractions wherever they go. AFM members also include musicians who never gain fame but who are talented and consummate professionals, and who earn their livings as "background" or "session" recording musicians or as live performers. The AFM negotiates numerous industry-wide collective bargaining agreements that establish the wages and conditions of employment for musicians in the sound recording, motion picture, television, radio, commercial announcements and traveling theater fields. AFM locals negotiate hundreds of collective bargaining agreements with local symphony, opera and ballet orchestras, local theaters and other local entertainment venues.

AFTRA is a national labor organization representing over 80,000 performers and newspersons that are employed in the news, entertainment, advertising and sound recording industries. AFTRA's membership includes approximately 11,000 vocalists on sound recordings, including singers who have royalty contracts with record labels and session singers who are not signed to royalty contracts. AFTRA negotiates industry-wide collective bargaining agreements that establish the wages and conditions of employment for vocalists in the sound recording and advertising industries.

Although traditional union representation in areas such as collective bargaining are integral to the AFM and AFTRA, the unions have not limited their representation of artists to those activities. As representatives of recording musicians and vocalists, both unions long knew that the lack of a

performance right in sound recordings unfairly depressed the incomes of all recording artists, including musicians and vocalists with royalty contracts ("featured artists") and those who made their living as session singers and session musicians ("non-featured artists"). Therefore, as early as the 1960's, the AFM and AFTRA began to fight for the creation of a performance right in sound recordings. When the enactment of a full performance right in sound recordings proved politically infeasible due to the adamant opposition of the powerful broadcast lobby, the AFM and AFTRA fought for the enactment of the Digital Performance Right in Sound Recordings Act of 1995 ("DPRA") and the Digital Millennium Copyright Act of 1998 ("DMCA") in order to cure at least some of the inequity caused by the lack of a full performance right in sound recordings. A key aspect of the unions' efforts – in which they were successful – was the insistence that the revenues derived from any new digital performance right created by Congress must be shared with featured and non-featured musicians and vocalists.

The unions continue to represent the interests of recording musicians and vocalists under the DPRA and DMCA. For example, the AFM and AFTRA are participants in the current Copyright Arbitration Royalty Panel proceeding convened to set the rates for the Sections 114 and 112 licenses (Digital Performance Right in Sound Recordings and Ephemeral Recordings, Docket No. 2000-9 DTRA 1 & 2 ("Webcaster CARP")).

The unions also represent the interests of featured musicians and vocalists with regard to the distribution of statutory license fees. Together with

other artist representatives, the AFM International President and the AFTRA National Director of Sound Recordings sit on the Governing Board of SoundExchange, the collective agent that licenses the public performances of copyrighted sound recordings and the making of ephemeral recordings and that collects and distributes the resulting revenue to copyright owners and featured artist performers.[1]

In addition, the unions have a supervisory role with regard to the distribution of statutory license fees to non-featured artist performers. Non-featured musicians are entitled to 2-½% of statutory license fees, which are first deposited in an escrow account managed by an independent administrator jointly appointed by copyright owners and the AFM, and then are distributed to musicians who have performed on sound recordings. See Section 114(g)(2)(A). Similarly, non-featured vocalists are entitled to 2-½% of statutory license fees, which are first deposited in an escrow account managed by an independent administrator appointed by copyright owners and AFTRA, and then are

[1] As a result of the CARP proceeding to set rates and terms applicable to pre-existing subscription services under the DPRA, the RIAA was designated as the sole collective to collect and distribute those statutory license fees. See 63 Fed. Reg. 25,394 (May 8, 1998). SoundExchange was created as an unincorporated division of the RIAA to fulfill that function. As a result of discussions with the AFM, AFTRA, and other artist representatives, the SoundExchange Board voted in the fall of 2001 to incorporate as an entity that is separate from the RIAA and that is subject to the control of a Governing Board equally divided between copyright owner and artist representatives. In the Webcaster CARP, SoundExchange sought to be designated as an agent to collect and distribute the license fees set by that CARP. The Panel designated SoundExchange as the Receiving Agent to collect all statutory license fees set by that CARP. See Report of the Copyright Arbitration Royalty Panel in Docket No. 2000-9 CARP DTRA 1 & 2 (Feb. 20, 2001) ("CARP REPORT"). It also designated SoundExchange as the Designated Agent to distribute such fees to copyright owners that choose SoundExchange to be their agent (currently, the copyright owners of approximately 90% of all sound recordings sold in the United States have so designated SoundExchange), to copyright owners that choose no agent, and to the performers who appear on the sound recordings owned by both of those sets of copyright owners.

distributed to vocalists who have performed on sound recordings. See Section 114(g)(2)(B). The AFM, AFTRA and copyright owners have appointed a single independent administrator to receive and distribute both the non-featured musicians' and the non-featured artists' shares. The unions in particular are involved in assisting and monitoring the efforts of the independent administrator.

B. The Interests of Recording Musicians and Vocalists

When Congress created the new digital performance right in sound recordings, it made clear the following intention: recording artists – both featured and non-featured musicians and vocalists – as well as copyright owners must benefit from the new digital performance right. Congress mandated that "45 percent of the receipts [of the compulsory licenses] shall be allocated, on a per sound recording basis, to the recording artist or artists featured on such sound recording." See Section 114(g)(2)(C). And, as described above, Congress also mandated that non-featured musicians and non-featured vocalists together must receive 5% of the receipts of the new compulsory licenses. See Section 114(g)(2)(A) and (B). In creating the new digital performance right, and in mandating that 50% of the new revenue streams created under it must go to recording musicians and vocalists, Congress was motivated by a desire to help and protect performers, as well as copyright owners, in the new digital age. See Sen. Rep. No. 104-128 at 13-14 (1995); see H. R. Rep. No. 104-274 at 10 (1995).

There can be no question that the new revenue streams that Congress created in Section 114 are extraordinarily important to recording artists. In the course of the Webcaster CARP, the unions presented substantial evidence that for the majority of recording artists – both featured and non-featured – recording income is relatively modest especially when considered in relation to the value of their creative contribution to the sound recordings on which they perform.[2] That is true for the majority of royalty artists – who often receive little or no return on their royalty contracts, which provide for the recoupment of recording and promotion expenses prior to the payment of any royalties to the artist. It is also true for non-featured musicians and vocalists who – if they record for a label that is a signatory to a union collective bargaining agreement – receive negotiated industry standard payments and benefits that are respectable but may be quite small in relation to the value of the recording on which they perform. Background artists that record for non-union labels often do not even receive industry standard wages or any benefits such as pension and health benefits for their work.

Recording artists have an important interest in the administration of the licensing revenue streams in which they share, as well as in the revenue streams themselves.[3] Among other things, they have an interest in the

[2] This evidence was presented in the written direct and rebuttal cases of the AFM and AFTRA, and in the oral testimony of their witnesses Jennifer Warnes, Kevin Dorsey, Gregory J. Hessinger and Harold Ray Bradley.

[3] As noted above, artist representatives make up 50% of the Governing Board that controls the operation of SoundExchange. The artist half of the Board includes artists as well as representatives from the AFM, AFTRA, the Recording Artist Coalition, the Future of Music Coalition, the National Academy of Recording Arts and Sciences and the Music Managers

promulgation of notice and recordkeeping regulations that will enable them to receive the new income streams that Congress intended to provide them under the DPRA.

For example, in Section 114(g)(2)(C), Congress provided that featured recording artists shall be allocated 45% of such receipts *"on a per sound recording basis."* Thus, each featured recording artist is entitled to compensation for each use of his or her sound recording by a service pursuant to the Section 114 license. As a result, services must keep and provide records of use sufficient to identify and make correct distributions to each of the featured recording artists on each of the sound recordings that is publicly performed by the service.

Congress also required, in Sections 114(g)(2)(A) and (B), that non-featured musicians and vocalists "who have performed on sound recordings" receive 5% of receipts. While this creates a somewhat more flexible standard of distribution than a strict per sound recording basis, the small size of the non-featured artists' share coupled with the immensely large population of potential recipients – non-featured performers who have performed on all of the sound recordings used by the services – result in unique distribution challenges. Non-featured artists have a strong interest in the promulgation of regulations that require the services to provide sufficient information to enable the

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Forum. The Governing Board has responsibility for establishing SoundExchange's policies, approving its collection and distribution mechanisms and methodologies, and overseeing the full range of its operations. Copyright owner and performer representatives on the Governing Board have an interest in keeping distribution costs reasonable and in ensuring fair and efficient distributions so that all copyright owners and performers receive the maximum benefits to which they are entitled.

independent administrator to effect an efficient distribution to as many non-featured artists as may reasonably share in the revenue stream.

II. Recording Artists Should Not Be Required to Pay the Costs of Data Collection and Reporting

The webcasters and broadcasters that participated in the Webcaster CARP proposed in their direct cases that they should not be responsible to report the identity of the sound recordings they have performed, but rather that the responsibility to determine that information should rest upon the agent(s) designated to collect and distribute royalties to copyright owners and performers.[4] They also proposed that to the extent that the services were required to provide the agent(s) with reasonable information regarding the sound recordings they perform, the agent(s) should reimburse the services for the costs of so doing.[5]

Such a position is manifestly unreasonable, because the services have and control the information regarding the sound recordings they perform, while the collection and distribution agent(s) for copyright owners and performers do not have access to that information and could not obtain it without extraordinary expense, if at all. Moreover, it is inconsistent with the notice and recordkeeping requirements established by the Copyright Office for the pre-existing subscription services. Those requirements recognize the services'

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[4] Direct Case of Broadcasters and Webcasters, Exhibit 3, Proposed Rates and Terms (April 11, 2001).

[5] Id.

obligation to provide – and the collection agent(s)' right to receive – records of use for the dual purposes of monitoring compliance with the statutory license terms and distributing license fees to copyright owners and performers. See Notice and Recordkeeping for Digital Subscription Transmissions, Interim Regulations, 63 Fed. Reg. 34,289 (June 24, 1998)("Interim Regulations"). And, it is also contrary to the Congressional intent to compensate performers and copyright owners for the digital performance of their sound recordings, because it would require them to bear virtually every expense of the services' compliance with the license and to expend extraordinary sums in order to collect the license fees to which they are entitled.

In this regard, it is worth noting the fact that performers and copyright owners already have relieved the services of significant costs to which the services would otherwise be subject under the terms of Section 114. Section 114(e) permits, *but does not require*, a copyright owner to designate an agent for the purpose of licensing and collecting Section 114 and 112 license fees. In the absence of such a designated agent, the services are required pursuant to Section 114(g)(2) to make payments and provide statements of account (and by extension, records of use) to *each copyright owner* of *each sound recording* that they perform. The costs of fulfilling this obligation would be extremely high, as the pre-existing subscription services noted in the rulemaking that led to the Interim Regulations. In that proceeding, the pre-existing subscription services urged the Copyright Office to relieve them of that burden by designating a single collective to serve as the agent for all copyright owners – even those that

chose no collective agent for themselves. The services argued that otherwise they would incur severe costs – amounting to millions of dollars annually – to identify and locate copyright owners, calculate royalties, and provide each copyright owner with statements of account and reports of use.

In fact, both the pre-existing subscription services subject to the first CARP and the webcaster and broadcaster services subject the Webcaster CARP have been relieved of the necessity of locating, paying and reporting to individual copyright owners. The terms set by both CARPs, as well as the recordkeeping rules that the Copyright Office promulgated in the Interim Regulations and the NPRM, allow *all* services to make payments and provide use information to only *one* collective agent for *all* copyright owners. As a result, the costs of identifying and locating copyright owners, calculating royalties and processing statements of account and reports of use have been shifted from the services to the performers and copyright owners, who must pay what it costs for the collective agent to perform these functions out of the license proceeds, thereby reducing the distribution to artists and copyright owners.

The system of centralizing all payments through any collection agent has efficiencies that benefit everyone, as the pre-existing subscription service and webcaster CARPs, the Copyright Office and the Librarian of Congress all have recognized. But it does have the effect of shifting certain costs of the services to the performers and copyright owners. The services should not be allowed in this proceeding to shift even more costs to performers and copyright owners,

especially where, as here, to do so would reduce rather than enhance efficiency as well as reduce the money available to distribute to performers.

III. The Records of Use Must Provide Sufficient Information to Permit Fair and Accurate Distributions to Featured Recording Artists and Non-featured Recording Artists

In the main, AFM and AFTRA support the regulations proposed in the NPRM, as streamlined by the proposals in the April 5, 2002 RIAA Comments, because they will provide SoundExchange (or any other agent) with sufficient information to conduct fair and accurate distributions to featured artists and, thus, to enable featured artists to benefit from the new digital performance right income streams as Congress intended. However, additional information regarding the identity of non-featured musicians and vocalists, where possessed or obtained by the reporting service, must also be provided in order to allow a reasonable distribution to non-featured artists as contemplated by Congress.

A. The Distribution to Featured Artists under Section 114(g)(2)(C) Is Complex and Cannot Be Accomplished With Only Minimal Data

As discussed in Part I.B. above, the Congressional mandate to compensate featured recording artists as set forth in Section 114(g)(2)(C) requires that each featured artist receive the statutorily-set share of the license fee paid for each use of his or her unique sound recordings under the license. As also set forth in Part I.B. above, this new income stream is extremely

important to artists, who, of course, must receive adequate incomes if their creative work – which is protected by the Copyright Act and is also valued by the services that intend to build businesses based upon performing the artists' sound recordings to the public – is to continue.

However, the distribution of the statutorily-mandated 45% share to featured artists requires exceedingly complex operations. The services have made and will continue to make millions of performances of hundreds of thousands of unique sound recordings. Processing the information regarding these performances requires a multitude of complex operations, both automated and manual. Section IV.A. of the RIAA Comments describes in detail the necessary processing steps as employed by SoundExchange, and we incorporate that description.

Moreover, the hundreds of thousands of unique sound recordings used by the services include many sound recordings for which the identification of the correct featured performer, non-featured performers and/or copyright owner is far from clear. For example, they include sound recordings with similar titles, sound recordings on labels with identical or similar names, different sound recordings of the same song title by the same featured artist that embody performances by different non-featured musicians or vocalists, and other such complex or ambiguous situations.[6]

[6] The RIAA Comments describe such situations in detail at Sections IV.F.1 and 2. We refer to these descriptions rather than repeat or restate them.

believe that appropriate distributions can be made to the correct non-featured and featured recording artists – that is, distributions that compensate featured and non-featured artists for the actual performances of their sound recordings – if the services provide only minimal information (such as merely song title and featured artist name). Additional data such as that called for by the regulation proposed in the NPRM, as streamlined in the RIAA Comments, is necessary. Moreover, to date the AFM and AFTRA have not seen any evidence that such data is unavailable to the services or overly burdensome for them to provide. The truth is that to the extent that the services do not provide such additional data, recording artists and copyright owners will be forced to expend license revenues to provide it themselves. This is neither fair nor consistent with the intent of Congress in creating the compulsory license.

B. Information Regarding the Performance of Each Unique Sound Recording Not Only Is Required By Statute, It Also Serves Important Goals of Promoting Diversity By Ensuring the Compensation of a Broad Range of Artists

The digital transmission of music via the pre-existing subscription services, webcasting and simulcasting has made available to listeners a vast array of music that has been unavailable to them on traditional over-the-air radio. The services that participated in the Webcaster CARP emphasized their ability to play more music of greater variety and to serve the interests of lesser-

[6] The RIAA Comments describe such situations in detail at Sections IV.F.1 and 2. We refer to these descriptions rather than repeat or restate them.

known artists and copyright owners by performing their music in varied "niche" formats.[7]

The expanded availability of more diverse and varied music, and any increased exposure of lesser-known (or as-yet-unknown) artists is a positive good. Its benefits must, however, include the benefit of compensating the artists involved for the use of their recorded performances pursuant to the Section 114 license. Although the services at various points have suggested that they should only be required to report samples of their performances, such "sampling" would not provide "niche" or less-known artists with the full value of compensation for the use of their recorded works. Only the reporting of detailed information regarding all performances will truly provide the benefits that the services say they provide to "niche" or lesser-known artists, by enabling the complete and accurate distribution to such artists of the compensation to which they are entitled under Section 114(g)(2).

C. The Records of Use Should Be Expanded to Require the Services to Report the Names of Non-featured Artists Where Available

Neither the proposed regulations in the NPRM, nor the modifications to those regulations proposed in the RIAA Comments, address the unique difficulties posed by the Section 114(g)(2)(A) and (B) distribution to non-featured musicians and vocalists, and neither provide sufficient information to accomplish that distribution.

[7] The RIAA Comments review some of the services' evidence in this regard in Section I.C.

As complex as are the operations of SoundExchange, and as many automated and manual operations as SoundExchange performs on the data provided by the services, at the point where SoundExchange transfers the non-featured artists' shares to the independent administrator an entirely new and different research process must begin. Under the Interim Regulations and the proposed regulations, none of the data provided by the services and none of the refinements to that data provided by SoundExchange are sufficient to enable the independent administrator to effect *any* distribution to non-featured performers. The simple fact is that the independent administrator is not provided with one non-featured artist name – despite the fact that the services have made their reports at least in part based on label copy or other material that often includes the names of non-featured musicians and vocalists who perform on the reported sound recordings.

In any circumstances, the task of the independent administrator – the distribution of the relatively small sums of money that will be generated by the non-featured artists' 5% share to many thousands of eligible performers – would be daunting. But, in the absence of a field requiring the reporting of non-featured artist names, the independent administrator's task becomes even more formidable, because it includes the *identification* of many thousands of non-featured musicians and vocalists who performed on many hundreds of thousands of sound recordings. The independent administrator has no one single or simple source for that information, but has been in the process of building a database based on his own research of a variety of sources.

The research sources employed by the independent administrator include to some extent session or other reports filled out pursuant to union collective bargaining agreements governing terms and conditions of recording sessions for signatory labels. Such union information, while helpful when available, is far from a complete answer to the problem because it is of no help in identifying non-featured artists who record for non-union labels – which include lesser-known and genre performers whom the unions believe should benefit from the license income.[8] The independent administrator also goes through the painstaking manual process of researching the identity of non-featured performers on recordings via commercial, public and private sources, including obtaining and reading label copy, manually researching on-line or other discographies, contacting knowledgeable industry sources, and soliciting information from record producers, labels, featured artists and non-featured artists.[9]

SoundExchange's refinements to the original data provided by the services provide important assistance to the independent administrator, as will the new data fields contemplated in the regulations proposed in the NPRM and

[8] Union report forms include both members and non-members of the unions, as long as they record under the relevant union contracts. However, there obviously are no union report forms for recording sessions to which the union contracts do not apply. Such non-union recording sessions may involve union member artists as well as non-union members. As required by the statute, and consistent with the guidelines established by the AFM and AFTRA, the independent administrator distributes license income without regard to the union membership or non-membership of the recipient.

[9] The processes described in large measure have been developed by the independent administrator in order to effect similar distributions of foreign remuneration for the use of sound recordings overseas. Research and processing to effect the first distribution of Section 114 license income is just beginning.

the RIAA Comments. But none of that data actually provides the information necessary to distribute to non-featured artists – their names.

The AFM and AFTRA believe that this information often is readily available to the services, and that they therefore easily can include it in the data they type in to the record of use. Label copy often includes the names of non-featured artists. To the extent that the services already are in possession of label copy or obtain it to fill out their reports of use, they should be required to include the names of any non-featured musicians and vocalists that appear on the label copy. Similarly, to the extent that services are in possession of other sources of non-featured artist names or consult such sources in order to fill out their reports of use, they should be required to include any names of non-featured artists that appear in those sources. In short, services should be required to record non-featured artist information when it is in their possession.

Although the services may object that they should not be required to bear any additional cost that may be involved in recording non-featured artist information, the practical realities weigh in favor of requiring them to do so. The costs to each service of recording information that is in their possession cannot be excessive. But the cost of letting that information go unrecorded – which is to require the independent administrator to expend much of the non-featured artists' minimal 5% share in manually researching and capturing information on thousands of recordings – information that the services had, but did not record – is extremely high. Given the extremely small size of the

non-featured artists' share in relation to the extremely large population of potentially entitled non-featured artists, the result may be to eviscerate Section 114(g)(2)(A) and (B) entirely, because there may not be sufficient funds left to distribute to more than a handful of non-featured artists out of the thousands whose creative efforts contributed to the success of the recordings enjoyed by the public and profited from by the services.

D. The Reports of Use Must Provide Sufficient Information to Monitor the Services' Compliance with the Licensing Requirement

The unions have focused in these Comments on the issues relating to the distribution of license revenue to artists. However, the AFM and AFTRA support the conclusion in the Interim Regulations and the regulations proposed in the NPRM that the services must provide sufficient information to monitor compliance with the licensing terms.

IV. Response to the Copyright Office Questions Regarding Notices of Use

The Copyright Office inquired whether the services should be required to file Notices of Use with the collection entity rather than the Copyright Office, and whether the collection entity should then be required to make such Notices available to the public for inspection and copying.

The AFM and AFTRA agree with the responses to the issues regarding Notices of Use contained in Section III of the RIAA Comments.

V. Conclusion

For all the reasons set forth above, the AFM and AFTRA urge the Copyright Office to adopt regulations that require the services to report

sufficient information to enable the collection agent(s) and the independent administrator to distribute fair and accurate shares of license revenue to featured and non-featured artists.

Respectfully submitted,

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