To: The US Copyright Office

From: Dave Davis, Jim Golden and Pete Scott, co-Founders Plai Anywhere (AI/Copyright Royalty Payment System)

We are three of the co-founders of a new venture called Plai Anywhere (pronounced play-eye) and are BRIEFLY responding to questions 10, 12 and 13, and to the comments already received. Plai Anywhere is building a licensing and royalty payment platform to facilitate the legitimate licensing and use of copyrighted content by generative AI platforms. Our platform will facilitate licensing both for the training of LLMs and for attributed payments for generative-AI outputs.

Plai Anywhere's founding team has decades of experience in AI, royalty collection and royalty payments. Of note, we will be powered by the royalty payment processing engine from Catch Media, a technology company that has processed more than a trillion transactions in a variety of contexts, including for books and music.

Question 10: If copyright owners' consent is required to train generative AI models, how can or should licenses be obtained?

Plai Anywhere's model will be an opt-in model, likely facilitated by a number of "retailers", such as book publishers or associations. In time, it will include a self-service registry, enabling creators to register their works, authenticate ownership, and upload works to the Plai Anywhere platform to facilitate a license with generative AI platforms.

Based on our deep experience, we believe our proposed solutions will be both transparent and economical. We recognize the Copyright Office's concerns about the feasibility of a centralized licensing and royalty payment system; however, we would urge you to exercise caution while we continue building our platform. We would ask that you allow us the time to prove feasibility before foreclosing this potential revenue stream to creators.

Question 12: Is it possible or feasible to identify the degree to which a particular work contributes to a particular output from a generative AI system? Please explain.

Plai Anywhere's platform will metatag and tokenize works and, by tracking those tags and tokens, we aim to be able to calculate probabilistic attribution for the degree to which a particular work contributes to a specific output. We are currently engaged with an independent book publisher to develop a proof-of-concept to prove feasibility of our solution. We are disappointed to see a few courts begin to potentially foreclose this potential revenue stream to creators. We are not copyright lawyers, but as stakeholders working in media, technology and AI, we believe this would be a grossly inequitable outcome.

Question 13: What would be the economic impacts of a licensing requirement on the development and adoption of generative AI systems?

We believe that the *failure* to mandate a licensing requirement, ironically, will have a negative impact on the speed and development of AI systems. To date, AI systems have benefitted from free access to high quality copyrighted materials. However, as we look to the future, if the economic rewards for creating copyrighted works are degraded, then there will be less incentive to produce new and novel works, and therefore less content of value to ingest and train these systems - resulting in less truly original material. Unique works will be replaced by an endless AI generated re-mix of society's greatest hits. While those re-mixes can then feed LLMs, they will generate significant bias in the system and decrease the value of developments in generative AI. Future systems will become something of a closed loop, with the same ideas regurgitated again and again into slightly repackaged formats. (On a practical level, one members of our team has been legally licensing healthcare data for the training of foundational AI models for years with little to no impact on speed, scale or progress of AI solutions that benefit our clients and partners.)

By contrast, the economic impact on creators has already been deeply felt, especially in the arts. We note that copywriters and graphic designers are among the first to feel the pain of being replaced or supplemented by AI, including from those platforms that may be using a derivative version of their unlicensed works.

Conclusion.

Allowing generative-AI systems to have free access to copyrighted works will (1) harm creators, decreasing artistic economic incentives and potentially putting many out of work, (2) diminish the creation of truly original works in society, which will in turn (3) ironically harm the ability of LLMs to improve because of reduced originality and weighted biases, thereby decreasing the quality and novelty of derivative works.

Respectfully,

Dave Davis, Jim Golden and Pete Scott on behalf of Plai Anywhere