

Respectfully submitted by:

Michelle Lewis o/b/o Songwriters of North America
Willie “Prophet” Stiggers o/b/o Black Music Action Coalition
Susan Genco o/b/o Music Artists Coalition

**Before the
UNITED STATES COPYRIGHT OFFICE
The Library of Congress**

In the Matter of:

Artificial Intelligence and Copyright

Docket No. 2023-6

**COMMENTS OF
SONGWriters OF NORTH AMERICA (SONA),
BLACK MUSIC ACTION COALITION (BMAC), AND
MUSIC ARTISTS COALITION (MAC)
IN RESPONSE TO THE NOTICE OF INQUIRY CONCERNING
ARTIFICIAL INTELLIGENCE AND COPYRIGHT**

Songwriters of North America (“SONA”), Black Music Action Coalition (“BMAC”) and Music Artists Coalition (“MAC”) (collectively, the “Creator Organizations”) are happy to have this opportunity to submit comments on behalf of our creator members in response to the U.S. Copyright Office’s (the “Office” or “you,” and “your”) Notice of Inquiry on Artificial Intelligence and Copyright, issued by the Office on August 30, 2023 (“NOI”). We continue to appreciate the Office’s acknowledgement of the importance of creator voices in connection with matters that concern or may have an impact on their works and thank the Office for its efforts in addressing these matters.

SONA, founded by songwriters Michelle Lewis and Kay Hanley in 2015, is a grassroots organization that advocates on behalf of songwriters’ interests before legislative bodies, administrative agencies, and the courts. BMAC is an advocacy organization formed to address systemic racism within the music business – our Coalition advocates on behalf of Black artists, songwriters, producers, managers, agents, executives, lawyers and other passionate industry professionals. MAC is a coalition comprised of artists, songwriters, and their representatives dedicated to protecting and advocating for artist rights without compromise. SONA, BMAC and MAC have a particular interest in ensuring that their

member voices are heard in response to the NOI, including the furtherance and flow of creativity and the exploitation and protection of those creative works, and we remain committed to continuing our advocacy efforts on behalf of songwriters, musical artists, producers and other music creators.

Comments

I. NOI Questions #1 and #2:

#1: What are your views on the potential benefits and risks of this technology? How is the use of this technology currently affecting or likely to affect creators and copyright owners?

#2: Does the increasing use or distribution of AI-generated material raise any unique issues for your sector or industry as compared to other copyright stakeholders?

We want to start by saying that creators are enthusiastic about the possibilities, innovation and creation that is being presented with the technological advances of generative artificial intelligence (“AI”). AI has already proven to be a useful tool to help creators generate ideas, compositions, designs, and we feel that it may lead to novel types of content and artistic expression. It can also provide real-time feedback to a creator helping them to refine their works. AI has the potential to be especially helpful to a creator exploring a new field of artistry, or in making derivatives of their existing works, broadening the scope of innovation, creativity and potentially a creator’s reach and audience.

Creators have long used various technological innovations in the development of their creations, especially in the digital age with the advent of Pro Tools, Ableton and other digital audio workstations (DAWs). We view AI as another new, exciting tool to foster creation in our industry. That said, creators are even more invested in the protection of their works under copyright, the authorization and proper licensing of those works, and the enforcement of a creator’s and/or owner’s copyright rights in those works. Afterall, the creators’ livelihoods hang on the protection and monetization of their creations.

There is a very real concern that AI infringes the exclusive rights in copyrighted works, from the AI’s inception when it is trained on copyrighted works that are not authorized or licensed for that use to the risk that the works generated from the AI output infringe upon these works. Without a proper licensing scheme to protect creators’ rights in existing works, there is an ever-present danger that copyright and those existing works become diluted and devalued.

There is also an imminent concern which has been at the forefront of the entertainment industry with the Writers Guild of America (WGA) and the Screen Actors Guild and the American Federation of Television and Radio Artists (SAG-AFTRA) strikes¹

¹ See generally Andrew Dalton and The Associated Press, *Writers Strike: Why A.I. is Such a Hot-Button Issue in Hollywood’s Labor Battle with SAG-AFTRA*, Fortune Magazine Online (July 24, 2023 2:29 AM),

and negotiations, that if AI can create a script, a musical composition, or mimic or replicate an artist's voice, image and/or likeness to the point that the human creator and artist themselves is not needed, the creators and artists will be replaced by AI and the value of their works, and their voice, image, likeness and other identification attributes will go unprotected. This is a serious threat to creators and artists and could be devastating if realized.

So, while we are optimistic and excited for the continued implementation and use of AI, we feel there is a need for (a) transparency in regard to its creation, production and training, (b) licensing of existing works in connection with the AI's uses of such works, and (c) federal protections for personality characteristics and traits for the unauthorized use of a person's name, image, voice, likeness and/or other personality attributes.

II. NOI Question #5: Is new legislation warranted to address copyright or related issues with generative AI?

With respect to copyright, we don't believe that any new legislation is currently warranted to address issues with AI related to copyright infringement or the copyrightability of a work. U.S. Copyright Law² (the "Law") has long established parameters for what constitutes authorship and infringement of a work³. Technological developments such as AI do not change that, but AI's developers, producers and users should respect it and be informed by it.

We are, however, concerned that without some kind of regulation surrounding the transparency and tracking of the uses of copyrighted works in AI training and output, the author or copyright owner whose work was used will not have the ability to authorize and license the use of the work, to evidence the use, and ultimately to either realize the value of their work or to protect their copyright rights in and to that work in the AI realm.

Data transparency and labeling are key components here and is where we feel there is likely a need for some regulation and uniformity. We have seen this play out similarly in the music industry with respect to data transparency and labeling in metadata of digital music. While it may still be far from an exact science, we have seen more and more transparency

<https://fortune.com/2023/07/24/sag-aftra-writers-strike-explained-artificial-intelligence/>. *See also* Gene Maddaus, *SAG-AFTRA Strike: AI Fears Mount for Background Actors*, Variety, (July 25, 2023, at 9:44 AM), <https://variety.com/2023/biz/news/sag-aftra-background-actors-artificial-intelligence-1235673432/>. *See also* Brian Contreras, *Screenwriters secured a new deal for AI. For actors, the fight could be even harder*, The Los Angeles Times (September 28, 2023, 5:00 AM), <https://www.latimes.com/entertainment-arts/business/story/2023-09-28/screenwriters-secured-a-new-deal-for-ai-for-actors-the-fight-could-be-even-harder>.

² *See generally* 17 U.S.C. (2010).

³ *See* 17 U.S.C. § 101 (2010) (defining what constitutes a work of authorship). *See also* 17 U.S.C. § 501 (2010).

and labeling over the years. It is now an expectation that all digital music is properly credited and labeled, which should lead to increased revenue for creators.

III. NOI Questions #9 & #9.1:

#9: Should copyright owners have to affirmatively consent (opt in) to the use of their works for training materials, or should they be provided with the means to object (opt out)?

#9.1: Should consent of the copyright owner be required for all uses of copyrighted works to train AI models or only commercial uses?

The basis of the Law is that copyright owners have a bundle of exclusive rights, including the right to make and distribute copies, to prepare derivative works and to publicly perform or display the work⁴. So, this is a resounding yes from creators as copyright owners to continue to have the fundamental right to affirmatively consent to the use of our works to train AI under all circumstances. There is no automatic exception to these rights, any assertion of an exception would need to be made in defense of a copyright infringement claim and evaluated on the details of the facts in that particular circumstance.

We emphatically oppose any opt-out system which would essentially usurp the basic copyright rights mentioned above. For a copyright owner to realize the full worth of their work, the copyright owner needs to be able to control to the fullest extent possible when and where the works are used and exploited, including the ability to freely negotiate the value of the work in an open market. An opt-out system is only beneficial to the AI developers and producers to give them an “out” per se allowing them to use and replicate copyright protected works without the need to obtain the owner’s consent and pay the true value for its uses. Furthermore, it would place additional burden on creators and copyright owners that did not want their works used for AI training by tasking them with having to take affirmative action to actively opt-out of something that under the Law, as it stands, they could simply not consent to or opt-in for.

As creators in the music industry, we are familiar with the opt-out system and it consistently does not work in our favor. For example, with respect to the safe harbor of the DMCA⁵ and platforms like YouTube and social media sites, we are constantly discovering violations of our works and spend exorbitant time trying to police and enforce our rights by reporting the infringements and sending takedown notices. We do not control these platforms and they are not directly liable for infringements by their users. This is an undue burden on creators and exemplary of how an opt-out system categorically fails us. Alternatively, having the AI developers obtain affirmative consent and licenses is simply

⁴ 17 U.S.C. § 106 (2010).

⁵ 17 U.S.C. § 512 (2010).

what the law is and should not be controversial or otherwise a burden to the party seeking the benefit of using our works.

IV. NOI Question #10.1: Is direct voluntary licensing feasible in some or all creative sectors?

We do feel that a direct voluntary licensing scheme is feasible and desirable in the music industry and that it is the premier system for copyright owners to realize and exercise their exclusive rights of copyright and to ultimately obtain the true value of their works. Any other licensing system is in effect a compromise by the copyright owner and a waiver of their right to control the use and exploitation of their works. Music is now almost fully consumed by digital means⁶ and there has been a concerted effort, especially following the passing of the Orrin G. Hatch-Bob Goodlatte Music Modernization Act in 2018⁷ and subsequent formation of the Mechanical Licensing Collective, to gather and centralize authorship and copyright metadata and information. In the technologically advanced digital world that is the topic of this comment paper, AI developers should not have too much difficulty in discerning who holds the copyrights in any recordings, music, or lyrics they may intend to be ingested during the training process, and then making contact with those rights holders to request consent, negotiate and process a license for the use. Direct voluntary licensing is typically how musical recordings and works are licensed and exploited and is the basis of some very large-scale music licensing for platforms such as TikTok⁸, YouTube and Peloton. There is nothing new or unusual in the music industry that would make direct voluntary licensing an issue with respect to AI.

V. NOI Question #10.3: Should Congress consider establishing a compulsory licensing regime?

No! As touched on in the above answers, as creators we are best able to maximize the value of our works in a free market with the ability to negotiate direct licenses. A compulsory licensing regime addresses only one of a creator's concerns: compensation. It does not address or give creators any creative control over their works. In sum, compulsory licensing is stifling to a creator's livelihood and creativity, and corners us into a place where

⁶ International Federation of the Phonographic Industry, *Industry Data*, <https://www.ifpi.org/our-industry/industry-data/#:~:text=Digital%20revenues%20have%20increased%20steadily,increasing%20by%2011.5%25%20in%202022.>

⁷ Orrin G. Hatch – Bob Goodlatte Modernization Act, Pub. L. No. 115-264, 132 Stat. 3676 (2018).

⁸ Olivia Solon et al., *TikTok is on track to earn \$12 billion this year and record label want a bigger cut of the action* (No. 8, 2022 8:05 AM), <https://fortune.com/2022/11/08/tiktok-profits-record-industry-wants-increase-royalties-revenue/>.

we are forced to spend our time fighting for market rates and lobbying for our rights when we would much prefer to be exercising our creative juices and creating new works.

VI. NOI Question #18: Under copyright law, are there circumstances when a human using a generative AI system should be considered the “author” of material produced by the system? If so, what factors are relevant to that determination? For example, is selecting what material an AI model is trained on and/or providing an iterative series of text commands or prompts sufficient to claim authorship of the resulting output?

Absolutely!

For some music creators, songs are derived from thin air, for some through divine sources, for some through diligence and hard work. But for all songwriters, ideas are filtered through a panoply of lived human experiences and emotions. The ability to express personal love, grief, unadulterated rage, and joy into melody and lyrics is uniquely human, and humans have been assisted in the formation of those expressions by various tools and inspiration over many years.

The Law recognizes that it is a unique human contribution or original expression that is copyrightable⁹, which includes works created with the use of tools. So long as a human has made a unique contribution to the work resulting in original expression, including through manipulation or interaction with that tool and the unique selection of elements therefrom, the work is copyrightable. The threshold of the human contribution and originality to warrant copyright protection has been found to be “extremely low.”¹⁰ Think of a film camera, the extent of human involvement is as simple as point the camera and press a button – the camera does the rest, and yet there is no question that a human is the creator of the photo. Such human’s contribution really can be reduced down to deciding what it is that is worth photographing.

For decades, musicians, producers and songwriters have used tools in the creation of their works – from classic instruments to electronic synthesizers, to Autotune; Ableton, AVID Pro Tools; and even thesauruses and dictionaries. Like the foregoing examples, AI is a tool for the creator to use as an extension of their creative process. The human user, as the one directing the tool, is the author of the resulting work.

To give you a parallel example of a relatively more recent, digital, technological advance that is used similarly as a tool and the work output of which rises to the level of copyrightability, we present to you AVID Pro Tools, a computer software that launched in 1989 and was heralded as a new era for music production.¹¹

⁹ 17 U.S.C. § 102(a) (2010).

¹⁰ *Feist Publ’ns., Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 345 (1991).

¹¹ *Avid Technology*. (2021). The Evolution of Pro Tools. Avid Blogs.

Pro Tools ushered in the era of computer-based computer software, and with “the advent of computer-based recording programs anyone with basic computer skills and the money to afford a ‘studio-in a-box’ [could] make recordings of reasonable quality.”¹² The ability of Pro Tools to mimic an entire studio setup on a computer made it revolutionary – and over the years so many plug-ins and digital instruments have been made available such that a user is actually able to create a song, start to finish, using only the program. Its user-friendly interface combined with professional-grade features made it the go-to for both budding artists and established musicians. No longer did a producer need a guitarist, a drummer, a recording engineer, or a musical studio to create music, it could all be done on the computer.

Likewise, producers, artists and songwriters can leverage AI’s neural networks and machine learnings to generate ideas for new creations. For instance, a producer or songwriter may ask AI to provide suggestions for chord changes which they might use to write a melody or lyric. Chord changes alone are not copyright protected, but the resulting melody and lyrics created by humans are. A producer or songwriter might also ask AI to provide suggestions for other musical metrics including danceability, energy, instrumentation and explicitness. These are some characteristics that may guide in the creation of a song or record, but they are not demonstrative of the authorship of those works. It is the human that selects these commands and prompts and uses the AI suggested outputs in the creation of their work that is the author.

Interestingly, software like Pro Tools and its contemporaries began integrating AI-driven features which have already been used in copyrighted works, whether it was AI-driven mixing suggestions, mastering tools, or sound recommendation engines, the boundaries of what was achievable in a DAW expanded exponentially.¹³ For musicians, this AI-enhanced process can be akin to having a virtual bandmate. One who, after analyzing vast amounts of musical data, can offer suggestions, or even generate backing tracks and harmonies. So, as you can see, the human user of the Pro Tools or other DAW software can use it in such a way as to create music and recordings, including the presence and feel of a full band, and by the user’s own selections, inputs and manipulations of the software are able to create a new original work. Ultimately though, no matter how much the tool assists in the physical creation of the work, just like with the film camera, it is the creator who is left with the uniquely human contribution of deciding what makes it into the final work and what does not – this ultimate creative control is the key to human copyrightable expression.

Pointing back to the question of “...**is selecting what material an AI model is trained on and/or providing an iterative series of text commands or prompts sufficient to claim authorship of the resulting output?**” – we recognize that the answer is nuanced and may become even more so as AI progresses. That said, if copyrighted works are used in the training of

¹² Horning, Susan Schmidt. *Engineering the performance: Recording engineers, tacit knowledge and the art of controlling sound*. Social Studies of Science, 34(5) Sage Publications, Ltd. 703, 704-705 (2004).

¹³ Avid Technology. (2021). The Evolution of Pro Tools. Avid Blogs.

the AI, those works must be properly licensed from the copyright owners prior to any such uses. To the extent that those copyrighted works are incorporated in any AI output, the original owner would retain ownership of their work as used in the new AI output. To the extent that a new AI output does not embody actual pieces of previously copyrighted works, the user who selected specific commands and prompts and has the ultimate decision of what it selects to use would be the author of the new work.

As creators, we are looking forward to working with AI and realizing the new realms that we can reach creatively, be it through inspiration and new ideas the AI can present to us or the ease and efficiency it may provide in our searches for alternative wording or sounds. For us, it's evident that the collaboration between humans and AI can, and will, create original, copyrightable content.

VII. NOI Question #19: Are any revisions to the Copyright Act necessary to clarify the human authorship requirement or to provide additional standards to determine when content including AI-generated material is subject to copyright protection?

No, we feel that existing copyright law and legal concepts as we discussed above sufficiently cover the copyrightability of AI output. The Office has already considered the question with some recent copyright registration applications and has provided its guidance in connection with those set of registrant circumstances.¹⁴ A copyrightable work is an original work with a human author, including a human author that has used technology as an instrument or tool in the creation of the work provided that the human has engaged with the technology, instrument, or tool in a manner and to an extent that they have made an original contribution. “Originality requires only that the author make the selection or arrangement independently ... and that it display some minimal level of creativity.”¹⁵

So, even if a work is AI-generated, a human's unique and original contribution qualifies for protection.¹⁶

VIII. NOI Question #30: What legal rights, if any, currently apply to AI-generated material that features the name or likeness, including vocal likeness, of a particular person?

There are certain legal rights and issues that are implicated by the use of AI-generated material that features the name or likeness, including vocal likeness, of a particular person, but the U.S. is lacking any national standard legislation to provide for some basic protections of

¹⁴ *Copyright Registration Guidance: Works Containing Material Generated by Artificial Intelligence*, 37 C.F.R. 202 (2023).

¹⁵ *Feist Publ'ns., Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 358 (1991).

¹⁶ 17 U.S.C. § 102(a) (2010). *See also* Jennifer Rothman, *Rothman's Roadmap to the Right of Publicity*, University of Pennsylvania Carey Law School (2023), <https://rightofpublicityroadmap.com/>.

these personality rights. This leaves creators potentially unprotected and creates confusion as to which law should be applied when trying to stop the unauthorized use of a creator's personality rights. This is especially harmful because it is the creators' highest priority to get any unauthorized materials taken down from wherever they are being exploited as quickly as possible, and having to work with a patchwork of legal remedies slows this process down indefinitely.

Currently, rights of publicity remain governed only on a state-by-state basis and less than half of the states in the U.S. formally recognize these rights by statute¹⁷, so people or entities may be incentivized to use and exploit AI generated materials using an artist's personality traits in a way and in a place without any or very minimal repercussions. Considering the ease with which people, AI and digital content can cross state borders, a uniform federal law can prevent conflicts and complexities in the application and enforcement of varying state laws.

While trademark law does address consumer confusion and dilution, it only applies to federally registered trademarks and states have been left to decide on a state-by-state basis¹⁸ whether personality traits will be protected under various publicity rights laws or regulations. That scheme has existed for many years and was able to stand without much challenge, possibly because prior to the digital age and development of social media and today's influencers, the Lanham Act and certain state laws were satisfactory enough to protect the identity of the previously limited number of people who were able to rise to a level of fame and widespread notoriety that was a branded personality or marketable commodity. In today's world though, with the speed of digital technology, immediate gratification, content consumerism, the accessibility of the internet and recording devices, social media influencers, and now the national recognition of name and likeness rights in college sports¹⁹, there is certainly a gap in protection for these valuable assets.

¹⁷ Mark Roesler & Gary Hutchinson. *What's in a Name, Likeness, and Image? The Case for a Federal Right of Publicity Law*, 13(1) *Landslide* (2020).

¹⁸ See generally Cal. Civ. Code § 3344 (West 1995). See also Cal. Civ. Code § 3344.1 (West 1995); Cal. Civ. Code § 3344.5 (West 1995).

¹⁹ See S.B. 206, Leg., Res. Sess. (Cal. 2019) (allowing college athletes in California to earn money from their name, image, and likeness); S.B. 646, Leg., Reg. Sess. (Fla. 2020) (allowing college athletes in Florida to earn compensation for the use of their name image or likeness and to hire agents); S.B. 20-123, Leg., Res. Sess. (Colo. 2020) (granting college athletes in Colorado the right to receive compensation for their name image and likeness and to hire an agent).

IX. NOI Questions #31 & #32:

#31: Should Congress establish a new federal right, similar to state law rights of publicity, that would apply to AI-generated material? If so, should it preempt state laws or set a ceiling or floor for state law protections? What should be the contours of such a right?

#32: Are there or should there be protections against an AI system generating outputs that imitate the artistic style of a human creator (such as an AI system producing visual works “in the style of” a specific artist)? Who should be eligible for such protection? What form should it take?

We feel strongly that new federal legislation is needed for the protection of a person’s identification – their image, voice, characterization, and other likenesses. Artists build their careers and brands on these personal characteristics and spend immeasurable amounts of time and money to develop their personality traits into a marketable commodity. There is a tremendous threat posed to artists by AI output that mimics or replicates these personality traits. We have already seen this issue manifest in a myriad of “deepfakes” including inauthentic recordings mimicking Kanye’s and Drake’s and the Weeknd’s voices, or fake videos featuring the image of politicians or other public figures.

In addition to the threat to artists with the emergence of deepfakes, there is a threat to the consumer if they are not made aware that what they are consuming is not an authentic or an endorsed work by the person who is being portrayed. The confusion for the consumer could lead to revenues being diverted from the artist because the product the consumer purchased was not actually the artist’s product. It could also lead to dissolution of the artist’s brand and marketability if any AI user is able to make a deepfake impersonating an artist.

This could lead to the inundation of unauthorized replicas of an individual’s personality traits and products containing those traits. The artist whose personality traits have been appropriated may not have the ability to stop or control the use depending on the applicable state or jurisdiction. The person or entity that had appropriated the use with AI could have the ability to exploit it for financial gain. This scenario is extremely offensive and damaging to an artist whose has built their brand and career on their own personality traits and the more fine-tuned AI technology becomes, the less distinction there will be between an AI generated image, voice and/or product and the artist’s own exploitations of the same. Imagine a social media video of an featuring an AI generated voice replication of a famous pop star, or any public figure for that matter, announcing a secret performance to buy tickets to or a new song to go listen to – or even worse making defamatory or offensive statements that don’t align with that person’s viewpoints. Deepfakes are nearly indistinguishable from the real person and the damage that can be caused by a viral video can happen in an instant. We need robust protection so that when, not if, these situations arise, they can be mitigated quickly and effectively.

We understand that there is draft legislation circulating on this topic, currently being referred to as the Nurture Originals, Foster Art, and Keep Entertainment Sage (NO FAKES)

Act.²⁰ We wholeheartedly and unabashedly support the consideration and hopeful eventual passing of legislation in this realm and are thrilled to know that it is in process.

We don't think that it would be necessary or desirable for any new federal legislation to preempt individual state legislation. It should simply serve as a basis for uniform national protection of personality rights and states that have or decide to enact state legislation on the matter would continue to have those rights supplemental to any federal legislation. As our Creator Organizations were founded in and are primarily based in California, we are familiar with California being a leader in the state enacted protections of rights of publicity and privacy²¹ and we have spent many years following the state legislature and electing representatives that will fight for us with respect to these matters. These are of the utmost importance to our craft and livelihoods. From our perspective, there is nothing that should warrant preemption of laws that have been thoroughly considered and vetted in our state, nor to effectively create a ceiling on those rights that are protected under state law.

Conclusion

Creators are indispensable to the music and entertainment industry and the protection of a creator's works is essential to their livelihoods. Even when using tools such as musical instruments, computer software like Pro Tools, cameras, dictionaries or thesauruses, we provide the human element to our works by making selections in what we choose to work with such as the materials, lens, focal point, coloring, lighting, wording, tempo, and immeasurable other elements. The whole of the elements that we select forms into a copyrightable work. Anything that might diminish our rights and protections of our works is devastating to us, our crafts, and our families. If we are unable to control our exclusive rights of copyright and license the use of our works accordingly, we may have to abandon our crafts to find paying work so that we can pay our bills and support our families.

We are passionate about our works and our business and we are excited to embrace AI as a tool to expand our creations. We also passionately need protection for our existing works so that they are not used without our permission and without remuneration, nor diminished in value or integrity.

²⁰ See Chris Coons et al., *Nurture Originals, Foster Art, and Keep Entertainment Safe (No Fakes) Act*, <https://www.coons.senate.gov/download/no-fakes-act-one-pager>. See also Ethan Millman, *New Senate Bill Seeks to Protect Artists from AI Deepfakes*, Rolling Stone (Oct. 12, 2023), <https://www.rollingstone.com/music/music-news/new-senate-bill-protect-artists-from-ai-deepfakes-1234852744>.

²¹ See generally Cal. Civ. Code § 3344 (West 1995). See also Cal. Const. art. I § 1 (California explicitly recognizing the right of privacy as an inalienable right); Cal. Civ. Code § 1708.8 (West 2016) (known as the "The Anti-Paparazzi Act," protecting against physical invasion of privacy, constructive invasion of privacy, and trespassing with intent to capture such images or recordings).

The Creator Organizations are pleased for the opportunity to submit these comments to you so that our voices may be heard and our creations protected. We appreciate the Office's consideration of our and others' comments.

Respectfully submitted,

SONGWRITERS OF NORTH AMERICA ("SONA")

/s/ Michelle Lewis

DocuSigned by:
Michelle Lewis
38EB565BC15E485...

Executive Director
Songwriters of North America ("SONA")
Email: info@wearesona.com

BLACK MUSIC ACTION COALITION ("BMAC")

/s/ Willie "Prophet" Stiggers

DocuSigned by:
Willie "Prophet" Stiggers
EF78F8AE97FD48F...

Co-Founder + Co-Chair
Black Music Action Coalition ("BMAC")
Email: info@bmacoalition.org

MUSIC ARTISTS COALITION ("MAC")

/s/ Susan Genco

DocuSigned by:
Susan Genco
16F3072BBF0C41F...

Board Member
Music Artists Coalition ("MAC")
Email: susan.genco@azoffcompany.com