

**From:** Squirm and Germ <squirmandger[REDACTED]>  
**Sent:** Tuesday, August 5, 2014 3:00 PM  
**To:** ATR-Antitrust - Internet <ANTITRUST.ATR@ATR.USDOJ.gov>  
**Subject:** ASCAP and BMI Consent Decrees

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*My name is Tim Girrback and I am an American songwriter, a member of ASCAP and a member of the band Squirm and Germ. I'm submitting this comment on my own behalf in opposition to the ASCAP and BMI consent decrees. I believe these government actions essentially are a compulsory license outside of the Congress and take away songwriters' rights to due process of law.*

*Just to be clear, I am not saying that Justice Department consent decrees in general are oppressive. I am saying that the way these particular consent decrees operate is oppressive to songwriters. That operation is oppressive because of the extremely long period of time they have been in effect, because they take away our valuable property rights to negotiate our own licenses, and they essentially force songwriters into being judged guilty before we've even expressed ourselves.*

*I hope you are able to take these comments into consideration as these decisions make a huge impact on my livelihood as a working artist.*

*Thank you,*

*Tim Girrback*

[www.squirmandgerm.com](http://www.squirmandgerm.com)  
[REDACTED]