

**From:** Paul Gelsomine [mailto:infoactgr [Redacted] ]  
**Sent:** Thursday, October 08, 2015 6:33 AM  
**To:** ATR-LT3-ASCAP-BMI-Decree-Review  
**Subject:** Please Level The Playing Field

My two cents.

The problem is largely, that under the principles of competition, there should be a basic rule, that each of the competitors are allowed to operate under the same conditions. However, the Consent Decrees under which ASCAP and BMI operate do not have the same content, and both are forced to compete with CMOs that are not subject to similar restrictions. This cannot be considered a fair competitive environment.

If PRO's were established as MRO's they would have the ability to license multiple rights. This kind of structure would be a more efficient and fairer, particularly in the context of the internet, and digital-transmitted media.

Music creators, small independent publishers and copyright owners livelihood is at stake. Please don't protect the people who listen to music from the very people that create it. Why should laws in one instance cater to large companies, and let big business and large publishers take home the doe, and leave the creators of that very music out in the cold?

That is why we need a decentralized distributed registry which is nonprofit. The entities accredited to register works and responsible for the promotion of the registry, on the other hand, would operate on a for-profit basis, which would incentivize organizations to become accredited registrars, thereby expanding the reach of the database. The approach means there would be more than one registry, just as we see in the computer DNS system, which distributes and propagates information around the world. The relevant parties would each have separate servers, synchronized with a main-database, where they enter information about musical works, which would then be propagated around the world.

Demand that a General database of music be created, slowly if necessary (it can be done), and that fundamental comprehensive metadata be dutiful attached to all song files be obligatory. If copyright holders don't start gaining some order in the vast quantity of music out there all will be hopeless.

Many changes would have to be made but if these all-in-one-rights were bundled through MRO's distributing revenue to copyright holders separately, this, would effectively be asking the music industry to give up an enormous amount of control.

This might be something larger publishers and labels would no like at all I'm afraid, but I would bet 99.9 percent of the indie portion of the music industry including composer, self publishers etc. (which by far is a larger group then the big boys all put together) would no doubt be in favor. It would give them a fighting chance!

Kindest regards,

Paul Gelsomine

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