



MOTION PICTURE ASSOCIATION OF AMERICA, INC.

**MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

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**VIA ELECTRONIC SUBMISSION ONLY**

Regan A. Smith, Esq.

General Counsel and Associate Register of Copyrights  
United States Copyright Office  
101 Independence Ave. S.E.  
Washington, D.C. 20559

September 21, 2018

**Re: Notice of Proposed Rulemaking re Copyright Office Fees, 37 CFR  
Part 201 (Docket No. 2018-4)**

Dear Ms. Smith:

The Motion Picture Association of America, Inc. (“MPAA”) represents the six major motion picture studios in the United States,<sup>1</sup> all of whom are heavy users of the Copyright Office’s registration, recordation, and related systems.

The MPAA does not oppose the fee increases proposed in the above-referenced Notice of Proposed Rulemaking (“NPRM”). While no user of a service wishes to pay higher fees, we understand that the Office requires additional revenue to undertake much-needed IT modernization projects, and that a substantial portion of such revenue must come from user fees. Our position is based on the expectation that the additional revenue that would be generated by the proposed fee increases would be used, as indicated in the NPRM, to further the goal of achieving a more modern, efficient registration system that permits, to the extent possible, submission of registration and related applications by electronic means, and improves the search and related functions of the Office’s online database.

We also acknowledge that, while the MPAA’s members will be in a position to determine how best to bear the higher fees proposed in the NPRM, small and individual creators, especially those who produce high volumes of less commercially valuable

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<sup>1</sup>Paramount Pictures Corporation; Sony Pictures Entertainment Inc.; Twentieth Century Fox Film Corporation; Universal City Studios LLC; Walt Disney Studios Motion Pictures; Warner Bros. Entertainment Inc.

works, such as photographers, would face less flexibility and much greater financial burdens. Higher fees could lead small companies and individual creators to reduce the number of works that they register, a result that would harm both creators and prospective users of copyrighted works. The MPAA thus supports efforts, such as those proposed by the Copyright Alliance, that seek to mitigate the effect of fee increases on these categories of creators, and minimize disincentives to registration. We also note the other concerns raised in the Copyright Alliance's filing in this matter and urge the Office to bear in mind the Alliance's suggestions as it determines how to proceed.

Thank you for your work on this issue, and others of importance to the MPAA's members.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ben Sheffner", with a long horizontal flourish extending to the right.

Benjamin S. Sheffner