

**Before the  
U.S. COPYRIGHT OFFICE  
LIBRARY OF CONGRESS**

**In the Matter of Alternative Fee  
Structures for Registration**

**Docket No. 2026-3  
Submitted June 24, 2026**

**COMMENTS OF THE  
MOTION PICTURE ASSOCIATION, INC.**

The Motion Picture Association, Inc. (“MPA”) appreciates the opportunity to submit the following comments in response to the Notice of Inquiry on Alternative Fee Structures for Registration (the “NOI”).<sup>1</sup>

MPA is a not-for-profit association founded in 1922 to address issues of concern to the motion picture industry. Over its more than 100-year history, MPA has grown to become the premier global advocate of the film, television, and streaming industry. MPA’s members are: Amazon Studios LLC; Netflix Studios, LLC; Paramount Pictures Corporation; Sony Pictures Entertainment Inc.; Universal City Studios LLC; Walt Disney Studios Motion Pictures; and Warner Bros. Entertainment Inc. MPA’s members and their affiliates are the world’s leading producers and distributors of filmed entertainment in the theatrical, television, and home-entertainment markets.

MPA’s members are high-volume users of the Copyright Office’s registration and recordation systems and rely heavily on both the Office’s hard-copy public records and online database. Our members therefore have a strong interest in ensuring that the Office is adequately funded to support its vital systems and services, and that the fees assessed to rightsholders are fair and equitable. In a notice of proposed rulemaking regarding a newly proposed fee schedule published in March (“fee study NPRM”), the Office highlights the delicate balance of needing to “enable recovery of a percentage of the Office’s costs [...] without imposing undue barriers to access its services.”<sup>2</sup> We commend the Office for initiating this study to explore how the adoption of alternative fee structures might minimize or eliminate barriers to registration.

Making the registration system more accessible is an important part of modernizing the Copyright Office and aligns with the Office’s strategic goal of “Copyright for All.”<sup>3</sup> Registration

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<sup>1</sup> Alternative Fee Structures for Registration, Notice of Inquiry (“NOI”), 91 Fed. Reg. 14,724 (Mar. 26, 2026), <https://www.govinfo.gov/content/pkg/FR-2026-03-26/pdf/2026-05886.pdf>.

<sup>2</sup> Copyright Office Fees, 91 Fed. Reg. 13,529, at 13,529 (proposed Mar. 20, 2026), <https://www.govinfo.gov/content/pkg/FR-2026-03-20/pdf/2026-05529.pdf>.

<sup>3</sup> U.S. Copyright Off., *Strategic Plan 2022-2026: Fostering Creativity & Enriching Culture*, <https://www.copyright.gov/reports/strategic-plan/USCO-strategic2022-2026.pdf> (last visited June 22, 2026).

is a critical pillar of the U.S. copyright system, helping to create a comprehensive public record of copyright ownership in the United States, which in turn helps facilitate licensing and has significant historical and cultural value. Our copyright system is made stronger by a public record that is a more robust reflection of the variety and breadth of copyrighted works and the creators behind them. MPA, therefore, does not object in principle to the adoption of alternative fee structures. Our views on any particular proposal will of course depend on its specific details. As the Office develops those proposals, however, the goal should be to explore alternative fee structures that (1) introduce greater efficiencies and reduce costs incurred by the Office; (2) incentivize small businesses and professional creators to register *more* of their copyrighted works; and (3) will be financially self-sustaining or funded through congressional appropriations. We look forward to assessing and providing more detailed feedback on any specific proposals the Office might consider. In the interim, we offer the following input for the Office’s consideration.

### **I. Introducing Greater Efficiencies and Reducing Costs Incurred by the Office**

In the fee study NPRM, the Office proposed the adoption of a new fee schedule that would increase fees on average 43% across Copyright Office services.<sup>4</sup> The Office explained that this increase is necessary in part because “the costs of providing Office services have risen substantially.”<sup>5</sup> While no user of a service wishes to pay higher fees, MPA’s members have not objected to the Office’s proposed fee increases, as they understand that the Office must recover a significant percentage of its costs from user fees. At the same time, a 43% increase in fees is substantial. If the Office adopts an alternative fee structure, one of the primary objectives should be to make the registration process more efficient, both for users of the system and registration examiners, and thereby reduce costs incurred by the Office.

### **II. Incentivizing Small Businesses and Professional Creators to Register *More* of Their Works**

In the NOI, the Office states that one of the goals of exploring alternative fee structures is to “enhance access to the copyright registration system, growing a robust record of copyright ownership.”<sup>6</sup> MPA supports the Office in its effort to make registration more accessible to copyright owners for whom registration has historically been cost prohibitive. As discussed in the NOI, one way to reduce financial barriers to registration might be to offer discounted fees for “small entities,” based on a demonstrated need. Although the NOI also contemplates discounts based on employee headcount and non-profit status, as well as differentiating fees for individuals and organizations, MPA believes that those distinctions do not necessarily address the issue of financial barriers to registration. Providing discounts to small businesses and professional creators that demonstrate financial need, however, could support the statutory requirement that fees be fair and equitable and give due consideration to the objectives of the copyright system.

We encourage the Office to study how best to implement a reduced fee for small entities so that it is likely to *increase* the number of works registered by the beneficiaries of the

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<sup>4</sup> Copyright Office Fees, 91 Fed. Reg. at 13,533.

<sup>5</sup> *Id.* at 13,530.

<sup>6</sup> NOI, 91 Fed. Reg. at 14,724.

discount—the goal here should be to identify and reduce existing financial barriers to facilitate a more comprehensive and robust public record of copyrighted works. The discount must be carefully calibrated so that the fees are low enough to encourage an increase in registrations while ensuring that cost recovery levels are at least maintained (if not increased). The U.S. Patent and Trademark Office offers a micro entity fee based on annual income that may provide a helpful model for the Office to consider.<sup>7</sup>

The NOI also discusses a subscription pricing model. Depending on how such a model is structured, a subscription option could also allow the Office to maintain or increase cost recovery levels while also encouraging an increase in registrations.

### **III. Funding Alternative Fee Structures**

Ideally, any alternative fee structures adopted by the Office would be financially self-sustaining (e.g., by increasing efficiencies/decreasing unnecessary costs incurred by the Office and increasing revenue by incentivizing copyright owners to register more works). If, despite a thorough examination of ways to reduce costs, the Office determines that implementing alternative fee structures would result in a budgetary shortfall, any additional costs should be recovered through congressional appropriations.

While reducing fees where feasible is a worthwhile goal, passing the costs on to other users by increasing fees for other services would be neither fair nor equitable, especially given the substantial fee increases the Office is already proposing. For example, the Office has proposed to increase the fee for the Standard Application (electronic) by 31%, from \$65 to \$85, and proposed to increase the base fee for recordation (electronic submissions) by 126%, from \$95 to \$215. MPA’s members register and record thousands of works per year—ranging from audiovisual works, to screenplays, to pictorial works associated with their movies and television programs—and they do not have the benefit of group registration options that provide reduced fees to other users of the system. Our members spend a substantial amount of money on Copyright Office fees. As the Office notes in the NOI, applicants registering motion pictures already subsidize the costs associated with registering other types of works that are more costly to process.<sup>8</sup> We encourage the Office to work with its Office of the Chief Economist and/or a qualified consulting firm to examine the financial impact of the proposed alternative fee structures, including whether and how they could both reduce costs and increase registrations without increasing fees for other stakeholders.

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<sup>7</sup> The USPTO’s micro entity designation also takes into account factors beyond income that would not be relevant in this context, such as the number of previous applications filed and whether the work has been assigned, granted, conveyed, or licensed. See U.S. Pat. & Trademark Off., *Save on fees with small and micro entity status*, <https://www.uspto.gov/patents/apply/save-on-fees> (last visited June 17, 2026).

<sup>8</sup> NOI, 91 Fed. Reg. at 14,726 (“For example, processing an application to register a motion picture on average costs \$83, whereas processing an application to register a literary work on average costs \$147. As a result, some applicants end up paying fees that are disproportionate to the costs borne by the Office. This misalignment effectively creates subsidies and can, over time, distort applicant behavior.” (footnotes omitted)).

MPA appreciates the opportunity to comment on this NOI and looks forward to providing further input, either through a reply round in response to this NOI or in response to a Notice of Proposed Rulemaking as the Office develops specific proposals for alternative fee structures.

Respectfully submitted,

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