

UNITED STATES COPYRIGHT ROYALTY JUDGES
The Library of Congress

In the Matter of:

DETERMINATION OF ROYALTY RATES
AND TERMS FOR MAKING AND
DISTRIBUTING PHONORECORDS
(*Phonorecords IV*)

Docket No. 21-CRB-0001-PR
(2023-2027)

CHURCH MUSIC PUBLISHER ASSOCIATION COMMENTS
IN SUPPORT OF PROPOSED REGULATIONS FOR SUBPART B RATES

The Church Music Publishers Association of the United States (CMPA) submits the following comments urging adoption of the Copyright Royalty Judges' proposed regulations setting rates and terms for Subpart B Configurations. The proposed regulations implement a recently negotiated settlement between RIAA, NMPA, and NSAI and would constitute a significant, 32% rate increase for the mechanical reproduction of CDs, vinyl, and digital downloads. In addition, we believe that the proposed annual adjustment to the rate reflecting any changes occurring in the cost of living, as determined by the Consumer Price Index, is an appropriate consideration as well. We are pleased with, and would gladly agree to and accept this settlement, if such is adopted by the CRB Judges.

The CMPA is an organization of U.S. publishers of Christian music which has a strong spiritual dimension who come together to share mutual areas of concern regarding copyright information, education, administration, and protection, and to facilitate public and industry awareness in these areas. Our membership of 51 companies, spread across 21 states, owns and administers song copyrights that include hymns, gospel songs, contemporary Christian, urban, praise & worship, liturgical, choral, southern gospel, hip-hop, children's, classical and songs embraced by every Christian denomination across America. Between the copyright holdings of

our members, plus those held by general market music publishers who are members of the NMPA (National Music Publishers' Association), we control over 95% of the Christian faith songs created and commercially published in the United States.

Considering also that the *Phonorecords IV* hearing will consider an adjustment in the streaming royalty rates as well, we are hopeful that as recorded streaming activity continues to increase, the Judges will adopt streaming rates that better reflect what parties would negotiate in a free market. Songwriters are in great need of better rates that more fully reflect their contributions.

In closing, CMPA is again extremely pleased with the proposed increase included in the Subpart B settlement negotiated by RIAA, NMPA, and NSAI. We hope that the Judges will also recognize the need for higher rates in the larger streaming hearing happening this year.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Don Cason". The signature is fluid and cursive, with a long horizontal stroke at the end.

Don Cason, President/CEO

Church Music Publishers Association Action Fund