

**Before the
United States Copyright Royalty Judges Library of Congress**

In the Matter of:

Modification and Amendment of
Regulations to Conform to the
MMA

Docket No. 18-CRB-0012-RM

COMMENTS FROM SEATTLE THEATRE GROUP

Regarding equal rates for all regardless of the size of the organization or corporate structure

Seattle Theatre group feels that the rates for artist's royalties should be the same for all artists and presenting/promoting organizations. Why should an artist be paid less for working with Live Nation or AEG, who dominates the concert industry vs. Non-profit presenters across our country?

Regarding the transparency of accounting and distribution of funds

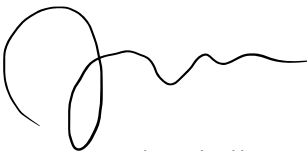
STG has reason to believe that payments we make to ASCAP and BMI do not always make it to the artists themselves. All presenting and promoting organizations should have the right to audit organizations like ASCAP and BMI

Regarding the overall system

The system feels unfair, in that we must pay ASCAP BMI and CSAC for every performance regardless of whether or not the artist has a contract with all three of these agencies. We feel that there are many times that they are paying ASCAP royalties on BMI artists. We recognize that this system is essentially rough justice and aims to compensate artist whose music might be performed on the evening of the concert. However, there is no system in place to appropriately monitor authorship of all songs being performed live.

Respectfully submitted,

December 10, 2018



Josh Labelle, Executive Director of Seattle Theatre Group