



**Reservoir Media Management, Inc.'s Comments on
Issues Related to Performing Rights Organizations
Docket No. 2025-1**

As a music publisher, Reservoir owns and/or represents thousands of musical composition copyrights, functioning as the rights holders and licensors on behalf of songwriters, artists, and estates. We witness firsthand the benefits of the performing rights organizations (PROs) and the simultaneous restrictions of the consent decrees and rate courts on our industry operating in a free market. Reservoir also operates a recorded music business and again witnesses the inequities across the two facets of the industry, particularly as it relates to the distribution of royalties. We feel strongly that a competitive marketplace is the best path to achieve greater parity across the music industry at large.

Specifically regarding the formation of new PROs, we are supportive of a competitive marketplace, and we do not believe that Congress and the Copyright Office should take any steps to limit the entrance of a new PRO into the ecosystem. While there may be increased financial and administrative costs due to entrance of additional PROs to the marketplace, the benefits of competition in a free marketplace outweighs any potential minor increase in the administrative costs of the licensee.

As they operate today, PROs utilize a blanket license system, which is an efficient way for licensees to get legal access to play music in public. Though not perfect, the system is a well-established process and has proven an effective tool for licensors to earn compensation for the public performance of their music. That said, a licensee is not obligated to use the system and can choose to license musical works directly from the owners of those musical compositions. Furthermore, any issues with the practices and policies employed by PROs are best addressed between the rights holders and the PROs themselves.

In conclusion, we believe that there should be less regulation overall and that a market-based solution will ultimately lead to better compensation for all creators and rights holders. We support a competitive marketplace, and we do not believe that Congress and the Copyright Office should take any steps to limit the entrance of a new PRO into the ecosystem.

Respectfully submitted,

Golnar Khosrowshahi
Founder and CEO
Reservoir Media Management, Inc.

