

September 5, 2012

VIA EMAIL AND FIRST CLASS MAIL

Tanya Sandros  
Deputy General Counsel  
United States Copyright Office  
Office of the General Counsel  
PO Box 70400  
Washington, DC 20024-0400

Re: Docket No. 2012-7; Request for Extension of Time to File Comments and  
Reply Comments

Dear Ms. Sandros:

The undersigned entities (the "Joint Requestors") write to request that the Copyright Office extend the deadline for filing Comments and Reply Comments in the above-referenced matter by thirty days each (i.e., until October 25, 2012 and November 26, 2012). The Joint Requestors represent the most active institutional participants in the mechanical compulsory license system. As such, the Joint Requestors believe that it would be beneficial to the Copyright Office and to the outcome of this proceeding for the Joint Requestors to formulate and submit consensus positions on as many of the issues raised in the Notice of Proposed Rulemaking ("NPRM") as possible. A process for formulating such positions is currently underway. However, the issues raised in the NPRM are numerous and complex, and that process has been slowed by publication of the NPRM in late July, at the height of the summer vacation season.

Additional time would allow the Joint Requestors the time needed to adequately think through the issues, consult further with their respective members, discuss consensus positions, and prepare a written submission setting forth whatever consensus positions the group is able to reach. Without an extension of time, the Joint Requestors will be less likely to reach consensus and provide the Office unified comments concerning the various issues raised in the NPRM.

We thank you in advance for your prompt consideration of our request.

Respectfully submitted,

  
\_\_\_\_\_  
Recording Industry Association of America, Inc.

  
\_\_\_\_\_  
National Music Publishers Association

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*Lee Krife/ABC*

Digital Media Association

*Les Watkins/ABC*

Music Reports, Inc.

*Charles Sandros/ABC*

Songwriters Guild of America