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Sent: Thursday, July 31, 2014 10:58 AM
To: ATR-LT3-ASCAP-BMI-Decree-Review <ASCAP-BMI-Decree-Review@ATR.USDOJ.GOV>
Subject: ASCAP-BMI Decree Review

Chief, Litigation III Section
Antitrust Division
U.S. Department of Justice

These comments are being submitted on behalf of the members of the Oklahoma Restaurant Association and Oklahoma Hotel and Lodging Association who are licensees of BMI. These comments concern the performance of protected works of various artists in restaurants and other public venues.

It is our belief that Performance Rights Organizations like BMI should be able to work with publishers to decide what businesses and rights the publishers wish BMI to license and which of these rights the publishers wish to license themselves. We support the efforts of BMI to seek clarification, and if necessary, amendment to the consent decree to make clear that licensing of multiple rights is permitted. It is important that Performance Rights Organizations like BMI be allowed to act as a "one-stop-shop" for musical works rights in order to provide maximum value and efficiency to our members.

We believe allowing BMI to modify their consent decree in this manner protects competition and creates an environment that protects the artists, the publishers, and the restaurant licensees. Requiring publishers to be either "all in, or all out" with Performance Rights Organizations like BMI would create a chaotic situation in our opinion. We believe such a result would benefit none of the parties involved and should be avoided. We support the efforts of BMI to modify their consent decree in the manner being suggested.

Thank you for allowing me to submit these comments for the record.

Jim Hopper
President/CEO
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