

31 January 2007



John Laughlin
Acting Director
Transport & Prices Oversight Branch
Australian Competition and Consumer Commission
GPO Box 520
MELBOURNE VIC 3001

Dear John

**COPYRIGHT LICENSING & COLLECTING SOCIETIES: A GUIDE FOR
COPYRIGHT LICENSEES.**

APRA | AMCOS welcomes the draft guidelines as a potentially informative document for copyright licensees, explaining their rights and obligations under the Copyright Act. We appreciate the opportunity to provide comment.

We support the intent of the document and provide some general comment only to suggest clarification for licensees and potential licensees.

1. We suggest that it is made clear that the document is for the reference of both existing and potential copyright licensees.
2. Given the title of document indicates reference to all copyright collecting societies, we suggest it may be of benefit to provide examples that specifically relate to and illustrate the function of each collecting society.
3. We envisage that increasingly businesses will seek to use iPods and other mp3 players and devices to publicly perform works that they have copied. This would constitute a licensable reproduction of music not impacted by the new fair dealing provisions and we suggest that the document might be well served in providing such an example.

If the medical clinic played music in its waiting room from an mp3 player or other similar device on which the clinic had transferred music, in addition to the licence from APRA and the PPCA, it would also require a licence from AMCOS and the relevant record companies for the reproduction of the music and recording respectively.

Please do not hesitate to contact me direct should you require any further information or clarification.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Brett Cottle', followed by a period.

BRETT COTTLE
CHIEF EXECUTIVE OFFICER

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