

**Before the
UNITED STATES COPYRIGHT OFFICE
The Library of Congress**

Copyright Office Fee Study

Docket No. 2026–2

Submitted May 4, 2026

**COMMENTS OF THE NEWS/MEDIA ALLIANCE AND 49 ADDITIONAL PRESS ASSOCIATIONS IN
RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

Introduction/Summary.

The News/Media Alliance (“NMA”) and the undersigned publisher organizations welcome the opportunity to comment in response to the Notice of Proposed Rulemaking on Copyright Office Fees, 91 Fed. Reg. 13,529 (Mar. 20, 2026) (“NPRM”).

The News/Media Alliance is a nonprofit organization representing over 2,200 newspaper, magazine, and digital media publishers in the United States, ranging from the largest news and magazine publishers to hyperlocal newspapers, and from digital-only outlets to papers who have printed news for centuries. NMA membership accounts for nearly 90 percent of the daily newspaper circulation in the United States and over 500 individual magazine and digital-only brands. As trusted and respected providers of high journalism, their content educates, informs, and entertains millions of Americans on a daily basis.

In addition to NMA, these comments are joined by America’s Newspapers, a national nonprofit championing the newspaper industry, and 48 state press associations, as listed as signatories below. Together, our members produce and publish quality journalism and media content that informs, educates, entertains, and connects readers and enriches their daily lives, covering natural disasters, conflict zones, school boards, townhalls, entertainment and the arts, and other matters of public interest to local, national, and international communities.

Copyright fees are a priority for news publishers of all sizes, including those new to registration and those still hoping for an economically feasible path to register. Copyright registration is vital for publishers to protect their investments in high-quality, original news and media content, and if necessary, go to court and obtain statutory damages. The news industry also has a strong interest in a fee schedule that promotes a robust public record and support for the Library’s

archival collections, of which news reporting is of especial historical value for our Congress, scholars, and citizenry.

We were surprised and disappointed to see the NPRM single out news publishers for a 3.5 fold price increase – significantly higher than any other commonly used registration option. Without an elasticity analysis or review of past registration practices, the NPRM would have local newspapers subsidize other copyright filers and users of the system, at a time when the economic model for sustaining journalism is under increasing stress. In trying to set up corporate differentiation between registration options, the proposal would burden local, independent news publishers with subsidizing the rest of the application pool, ranging from the largest motion picture studios to the very technology companies who are infringing publishers’ copyrights. If the proposed GRNW fee increase is adopted, it would disproportionately depress registrations for this core copyright sector, contrary to the objectives of the Copyright Act and the factual evidence in this rulemaking.

While we support the Copyright Office having adequate funding to perform its core duty of efficient copyright registration, we strongly object to the excessive burden the proposal would place on local journalism. Our comment focuses on certain proposed increases that are unfair and inequitable, and if enacted, would not serve the objectives of the Copyright Act. Specifically we recommend:

- Freezing, or at least dramatically reducing the proposed fee increase, for the Group Registration of Updates to a News Website (GRNW) option, rather than singling out the press for differentially burdensome fee hikes despite documented evidence of significant price elasticity, highlighted by 30 letters from state press associations and individual publishers in Appendix A;
- Immediately striking the content-based limitation in GRNW, which drives inefficiency and costs, while at the same time denying access to copyright registration based on the subject matter of news a website chooses to publish;
- Reducing the proposed increases for special handling and requests for reconsideration;
- Reducing the amount of indirect costs credited to registration-fees by removing costs associated with non-fee bearing “services,” like PIA, PIE, and part of OGC, in keeping with the approach of the 2020 fee increase and instead of allocating \$5.41 in indirect costs to every \$1 of direct work;
- Removing costs associated with IT modernization for copyright registration applicants, since those applicants have already subsidized modernization costs

for many years without experiencing any benefits, similar to adjustments made in the 2020 final rule;

- Increasing the fees for lesser-used services.

News publishers worked closely with the Office on GRNW, which in 2024 made registering online content possible for publishers for the first time. We commend the Office for its action, and publishers of all sizes have embraced it since its adoption. The proposed fee schedule, however, threatens the significant progress achieved through GRNW, while not solving eligibility limitations that tax the efficiencies of both publishers and the government.

At a time when journalistic margins can be razor thin, the proposed increases would risk making GRNW economically unavailable for many small and local publishers, while the availability of special handling and appeals are important due to urgent litigation needs and the uncertainty caused by GRNW's definitional limitations.

While we must oppose certain elements of the proposed fee schedule, we remain supportive of the Copyright Office and its expert administration of the copyright system. To that end, we support increased appropriations to aid IT modernization efforts and other necessary activities and services, and look forward to participating in the Office's study on alternative fee structures for registration.

I. The Fee Schedule Must Be Adjusted to Avoid Significantly and Disproportionately Disadvantaging the News Media Industry, Contrary to the Copyright Act, First Amendment, and Administrative Procedures Act.

a. News Media Publishers Depend upon Copyright to Power American Journalism.

News media publishers rely on copyright law to protect their investments in original content and to power American journalism. News publishers were estimated to employ approximately 134,000 people in 2025, while magazines employed over 88,000 people.¹ Employment in digital-native newsrooms, meanwhile, increased from approximately 7,400 in 2008 to over 18,000 in 2020.² The content produced by these professionals reaches hundreds of millions of Americans every year.³

¹ Newspaper Publishing in the US - Employment (2005–2032), IBIS WORLD (Mar. 2026), <https://www.ibisworld.com/united-states/employment/newspaper-publishing/1231/>; Magazine & Periodical Publishing in the US - Employment (2005–2032), IBIS WORLD (Feb. 2026), <https://www.ibisworld.com/united-states/employment/magazine-periodical-publishing/1232/>.

² Mason Walker, *U.S. Newsroom Employment Has Fallen 26% since 2008*, Pew Research Center (Jul. 13, 2021), <https://www.pewresearch.org/short-reads/2021/07/13/u-s-newsroom-employment-has-fallen-26-since-2008/>.

³ NEWS/MEDIA ALLIANCE, *2025 Market Report on News Media and Magazine Audiences* (Dec. 16, 2025), <https://www.newsmediaalliance.org/2025-market-report/>.

Beyond the numbers, newspapers form a fundamental part of the American life and serve as an essential pillar for representative democracy. By keeping decision makers in check, a healthy news ecosystem corresponds with societal benefits including lower municipal lending costs,⁴ while local and regional newspapers are often responsible for some of the biggest scoops that change the national discourse, from the Jeffrey Epstein scandal to sexual abuse at USA Gymnastics.⁵ Many publishers are small or local publishers or non-profits that rely on philanthropic grants from donors to publish news – including NMA members *The Smithsonian*, Center for Investigative Reporting (“*Mother Jones*”), *Faith Catholic*, and Council on Foreign Relation (“*Foreign Policy*”).⁶

Copyright registration is vital for publishers to effectively protect their investments and enjoy the benefits of copyright, including to obtain statutory damages that make enforcement efforts financially feasible – as the Supreme Court has noted, “without right of vindication, a copyright is valueless.”⁷ Excessive registration fees should not stand in the way of meaningful vindication. In copyright terms, as the current Register of Copyrights noted in her prior capacity as a professor, “[t]o the extent that section 412 operates to prevent the effective enforcement of rights, it may amount to a formality imposed on their ‘enjoyment,’”⁸ impermissible under the Berne Convention.⁹ And while news publishers are willing to pay their reasonable share to support the efficient registration of copyrightable works, it is by design that the copyright registration system is not entirely self-funded (let alone able to subsidize other services and educational or policy initiatives of the Office). As the Office previously explained, while “registration provides crucial benefits for copyright owners,”¹⁰ it also facilitates the public record, helps users license works, and contributes to the collections of the Library of Congress more than \$57 million worth of deposit materials.¹¹

⁴ Pengjie Gao, Chang Lee & Dermont Murphy, *Financing Dies in Darkness? The Impact of Newspaper Closures on Public Finance* (Hutchins Ctr. Working Paper No. 44, 2018), <https://www.brookings.edu/wp-content/uploads/2018/09/WP44.pdf>.

⁵ See David J. Neal, *Miami Herald’s Julie Brown receives Polk Award for ‘Perversion of Justice’ stories*, Miami Herald (Feb. 9, 2019, 6:03 PM), <https://www.miamiherald.com/news/local/crime/article226462555.html>; Justin L. Mack, *IndyStar journalists who helped put Larry Nassar in jail win major journalism award*, IndyStar (Mar. 29, 2018, 11:04 AM), <https://www.indystar.com/story/news/2018/03/29/indystar-journalists-who-helped-put-larry-nassar-jail-win-major-journalism-award/469161002/>.

⁶ Other publishers, meanwhile, rely on reader donations. See, e.g., Sarah Scire, *How The Guardian Raised a Record Amount of Reader Revenue in the U.S.*, NIEMANLAB (Jan. 18, 2024), <https://www.niemanlab.org/2024/01/how-the-guardian-raised-a-record-amount-of-reader-revenue-in-the-u-s/>.

⁷ *Washingtonian Publ’g. Co. v. Pearson*, 306 U.S. 30, 40 (1939).

⁸ Shira Perlmutter, *Freeing Copyright from Formalities*, 13 *Cardozo Arts & Ent. L.J.* 565, 574-75 (1993).

⁹ Berne Convention for the Protection of Literary and Artistic Works art. 5, Sept. 9, 1886, as revised at Paris on July 24, 1971 and amended in 1979, S. Treaty Doc. No. 99-27 (1986).

¹⁰ Copyright Office Fees, 83 Fed. Reg. 24,054, 24,056 (May 24, 2018).

¹¹ George Thuronyi, *Year in Review: The U.S. Copyright Office*, Library of Congress Blogs (Dec. 29, 2025), <https://blogs.loc.gov/copyright/2025/12/year-in-review-the-u-s-copyright-office/>.

The history of news media registration practices makes continued participation in the system especially important. As the Copyright Office has wisely recognized, for too long, registration options for news publishers were subpar, with a requirement to use microfilm lingering until 2018 (well after the format’s end of life),¹² and the long-requested option to register dynamically updated online websites not available until the introduction of GRNW in 2024.¹³ Because GRNW is limited by the existing eCO registration system, the process is burdensome, requiring the submission of specifically labelled individual PDF files for each day of the month, instead of more modern approaches such as by leveraging API-based solutions. These practical demands require many publishers to employ third-party service providers, adding costs on top of Copyright Office filing fees. Despite these technical limitations, publishers welcomed the GRNW option with open arms, and the Office has registered over 1,500 applications via the GRNW option to date.

At the same time, the Office has not yet removed the requirement that a news website cover “all subjects and activities and is not limited to any specific subject matter,” a content-based restraint that raises constitutional concerns and adds to examination costs.¹⁴ As a result, many publishers have had to invest scarce resources in outside counsel and costly appeals to preserve their legal ability to enjoy the full benefits of protection in unambiguously copyrightable material. Nevertheless, we commend the Office for the progress represented by GRNW, and encourage the Office to stay the course by further improving and streamlining this process. GRNW is a success story to be nurtured, not discouraged, to fulfil the objectives of copyright.

Economically accessible copyright registration is particularly important given the explosion of unauthorized uses of news content that has accompanied the more positive aspects of AI innovation. AI models are often developed using unauthorized copies of publisher content, augmented by further copying via retrieval augmented generation (RAG) to reproduce or summarize breaking news, and some AI models power substitutive services that disincentivize users from visiting the original articles.¹⁵ The resulting harm to subscription, advertising, and

¹² 37 C.F.R. §202.19 (2018).

¹³ 37 C.F.R. §§201.3, 202.4 (2024).

¹⁴ 37 C.F.R. § 202.4(m)(1)(i) (2026). A strict interpretation of this rule could exclude many news websites, including those focused on politics, entertainment, sports, or other thematic areas covered by traditional newspapers. In addition, the artificial distinction on “what is news” requires the Copyright Office to make judgement calls that take valuable time and increase costs to registrants; the Office has yet to articulate a governmental interest in this particular exercise. *See also* Letter from Association of American Publishers et al., to Suzanne Wilson, General Counsel and Associate Register of Copyrights, U.S. Copyright Office (Apr. 4, 2024), (hereinafter “Joint GRNW Letter”), <https://www.copyright.gov/rulemaking/newswebsite/Association-of-American-Publishers-et-al-Letter-to-Copyright-Office.pdf> (conveying unanimous support from 9 literary or copyright organizations advocating for removal of this limitation and other changes).

¹⁵ *See, e.g.,* NEWS/MEDIA ALLIANCE, *White Paper: How the Pervasive Copying of Expressive Works to Train and Fuel Generative Artificial Intelligence Systems is Copyright Infringement and Not a Fair Use* (2023), <https://www.newsmediaalliance.org/wp-content/uploads/2025/02/AI-White-Paper-with-Technical-Analysis.pdf>.

licensing revenues, may accelerate the desertification of American journalism.¹⁶ At this critical inflection moment in digital copyright, it is incredibly important that the Office avoid increases that depress participation in registration, especially increases targeted directly at sectors affected by ongoing litigation.

b. News Media Registration is Subject to Very High Price Elasticity.

As vital as registration is to publishers, economic reality makes continued participation in the system fragile. The vast majority of publishers simply are not large corporations that can subsidize other registrants and users of Copyright Office services. Many publishers operate on low or declining profit margins, with some small publishers operating on margins as low as 2 to 3 percent.¹⁷ Such publishers are essentially high-risk businesses with “very little room for error because they measure annual revenue in the low millions or hundreds of thousands of dollars. A slip-up in projecting revenue or expenses can lead to bankruptcy.”¹⁸ Over the past two decades, the United States has lost more than 3,500 newspapers and 270,000 newspaper jobs.¹⁹ Almost two-fifths of all local newspapers have disappeared, “leaving 50 million Americans with limited or no access to a reliable source of local news.”²⁰ Indeed, some small publishers resort to crowdfunding, seeking as little as \$7,500 keep publishing the news their communities rely on.²¹ As the *Groton Independent*, which has published local news for over 143 years, recently appealed “today, running a weekly newspaper is harder than ever,” and “once

¹⁶ See Northwestern Medill, *News deserts hit new high and 50 million have limited access to local news, study finds* (Oct. 20, 2025), <https://www.medill.northwestern.edu/news/2025/news-deserts-hit-new-high-and-50-million-have-limited-access-to-local-news-study-finds.html>; Angela Fu, *An alarming number of independent publishers and small chains closed papers last year, new Medill study finds*, Poynter (Oct. 20, 2025), <https://www.poynter.org/business-work/2025/medill-report-local-news-closures-independent-papers-news-deserts/>.

¹⁷ Brier Dudley, *These publishers won't sell out. But staying independent keeps getting harder*, Poynter (Nov. 5, 2025), <https://www.poynter.org/business-work/2025/independent-newspapers-fight-to-survive-local-news-decline/>; Penelope M. Abernathy, *The Expanding News Desert*, Hussman Sch. Journalism & Media, Univ. N.C. (2018), <https://www.usnewsdeserts.com/reports/expanding-news-desert/loss-of-local-news/bigger-and-bigger-they-grow/>.

¹⁸ Penelope M. Abernathy, *The Expanding News Desert*, Hussman Sch. Journalism & Media, Univ. N.C. (2018), <https://www.usnewsdeserts.com/reports/expanding-news-desert/loss-of-local-news/bigger-and-bigger-they-grow/>.

¹⁹ Angela Fu, *An alarming number of independent publishers and small chains closed papers last year, new Medill study finds*, Poynter (Oct. 20, 2025), <https://www.poynter.org/business-work/2025/medill-report-local-news-closures-independent-papers-news-deserts/>.

²⁰ Zach Metzger et al., *The State of Local News Project, 2025*, Medill Local News Initiative, 8 (2025), <https://localnewsinitiative.northwestern.edu/projects/state-of-local-news/>.

²¹ Paul Kosel, *Local News Matters! Stand with The Groton Independent*, GoFundMe (Feb. 28, 2026), <https://www.gofundme.com/f/keep-the-groton-independent-alive-c8e45/>; Lois Allen, *Save Your Local Newspaper!*, GoFundMe (Feb. 8, 2022), <https://www.gofundme.com/f/sh92h-save-your-local-newspaper/>; Jill Meier, *Help keep the BV journal telling “our community” stories*, GoFundMe (Feb. 22, 2026), <https://www.gofundme.com/f/help-keep-the-brandon-valley-journal-alive/>; Kurt Johnson, *Support Local Journalism in Las Cruces*, GoFundMe (Dec. 8, 2025), <https://www.gofundme.com/f/support-local-journalism-in-las-cruces/>.

they disappear, they rarely come back. When a local paper closes, a town loses more than news — it loses accountability, history, connection, and a trusted local voice.”²²

Large publishers are not immune from the realities of the publishing industry economics, with recent reports of significant layoffs by the Washington Post, People, Inc., CBS, NBC, and the Chicago Tribune.²³ These losses reverberate throughout the entire publishing and media industry with “17,000 jobs” cut in 2025 alone.²⁴ News organizations must navigate challenging headwinds due to multiple factors, including monopolistic practices in the digital advertising markets, inflation, and other economic volatility.²⁵ Meanwhile, the rise of bot scraping and unauthorized reuse of publisher content for commercial AI purposes is further pressuring publishing economic models.²⁶ And publishers are generally not well-positioned to absorb increased costs by raising prices due to the demand for newspapers being “not nearly as inelastic as it used to be.”²⁷

As the Office has recognized, news media publishers of all sizes struggled to comprehensively register their works until the advent of the GRNW option, and many had refrained from registering at all. NMA regularly outreaches to news publishers who do not yet register to encourage their participation, and while registration rates are increasing, cost remains a primary concern. While we commend the Office for the 2024 introduction of GRNW, now is the

²² Paul Kosel, *Local News Matters! Stand with The Groton Independent*, GoFundMe (Feb. 28, 2026), <https://www.gofundme.com/f/keep-the-groton-independent-alive-c8e45/>.

²³ Benjamin Mullin, Katie Robinson & Erik Wemple, *Washington Post Lays Off More Than 300 Journalists*, The NY Times (Feb. 4, 2026), <https://www.nytimes.com/2026/02/04/business/media/washington-post-layoffs.html>; Charlotte Tobitt, *More than 3,000 journalism job cuts tracked in UK and US in 2025*, The Press Gazette (Jan. 13, 2026), <https://pressgazette.co.uk/publishers/journalism-job-cuts-2025-tracked/>.

²⁴ *Media Industry Continues Reshaping Workforce in 2025 Amid Digital Shift*, InsideRadio (Dec. 31, 2025), https://www.insideradio.com/free/media-industry-continues-reshaping-workforce-in-2025-amid-digital-shift/article_403564f7-08ce-45a1-9366-a47923cd2c09.html.

²⁵ See, e.g., Catherine Wolf and Li Lu, *Digiday+ Research: How Dow Jones, Forbes, The Guardian and Other Publisher Revenue Streams Are Shifting in 2026*, DIGIDAY (Apr. 1, 2026), <https://digiday.com/media/digiday-research-how-dow-jones-forbes-the-guardian-and-other-publisher-revenue-streams-are-shifting-in-2026/>; *Explainer: What does ruling on Google's illegal ad tech monopoly mean?*, REUTERS (Apr. 17, 2025), <https://www.reuters.com/sustainability/boards-policy-regulation/what-does-ruling-googles-illegal-ad-tech-monopoly-mean-2025-04-17/>; Gilad Edelman, *Will Google Ever Have to Pay for Its Sins?*, THE ATLANTIC (Jan. 14, 2026), <https://www.theatlantic.com/ideas/2026/01/google-antitrust-lawsuit-media/685619/>.

²⁶ See, e.g., Sophie Nichole Salivio, *AI Bots Hit Publishers as Referral Traffic Plummet*, SECURITYBRIEF (Apr. 8, 2026), <https://securitybrief.co.uk/story/ai-bots-hit-publishers-as-referral-traffic-plummet>; Rob Waugh, *Third-Party Scrapers Are Stealing Publisher Content to Order for AI Companies*, PRESS GAZETTE (Jul. 24, 2025), <https://pressgazette.co.uk/platforms/third-party-scrapers-are-stealing-publisher-content-to-order-for-ai-companies/>; Alex Reisner, *The End of Publishing as We Know It*, THE ATLANTIC (Jun. 25, 2025), <https://www.theatlantic.com/technology/archive/2025/06/generative-ai-pirated-articles-books/683009/>.

²⁷ See, e.g., Bob Miller, *Pew Study Examines Why Americans Hesitate to Pay for News*, EDITOR & PUBLISHER (Apr. 28, 2026), <https://www.editorandpublisher.com/stories/pew-study-examines-why-americans-hesitate-to-pay-for-news,261264>; Hsiang Iris Chyi & Ori Tenenboim, *Charging More and Wondering Why Readership Declined? A Longitudinal Study of U.S. Newspapers' Price Hikes, 2008-2016*, 20 Journalism Stud. 14, 2113, 2126 (2019).

time to build, not retrench, on that progress. At a time when any additional costs are heavily scrutinized, all available economic evidence suggests that increased registration fees on news publishers would materially discourage copyright registration and reduce their presence in the public record.

c. The Proposed GRNW Fee Increase Exceeds the Office’s Authority.

i. The Proposed GRNW Fee Increase Is Based on Unsupported Assumptions and Insufficient Data to Require Newspapers to Heavily Subsidize Other Filers, including the World’s Largest Companies.

The proposed GRNW fee hike greatly exceeds the zone of reasonable increases acceptable to levy upon a highly elastic, public-service oriented industry, and the NPRM lacks the economic and legal analysis that would be necessary before requiring newspapers to subsidize the largest corporate filers. Nowhere does the NPRM examine whether, out of all of the constituents who register copyright, local journalism providers are best placed to subsidize other applicants. They cannot.

Although the Copyright Office must “collect fees to apply toward the costs of providing certain services,” “central to the Office’s mission is ensuring that our fees do not impose undue barriers to access copyright services.”²⁸ Any hikes to registration-related fees must be based on a study, should not be “more than that necessary to cover the reasonable costs incurred by the Copyright Office” plus a reasonable inflation adjustments, and must be “fair and equitable and give due consideration to the objectives of the copyright system.”²⁹ Under the last step, the Office must consider whether fees would discourage voluntary participation in the registration scheme, contrary to the national objectives to allow applicants to realize the benefits of copyright protection and for the Office to maintain a robust public record and contribute significant benefits to the Library of Congress’ collection.³⁰ To the extent that cross-subsidization between fees is allowed, it must be supported by careful study and documentation: Congress has not yet enacted the Office’s requested statutory changes that would permit broader subsidization “based on the aggregate costs of operating the Copyright Office, rather than specific services.”³¹

The proposed GRNW fee increase is arbitrary and unsupportable under these standards. A 268% price increase for GRNW far exceeds inflationary costs or proposed increases for other

²⁸ Copyright Office Fees, 91 Fed. Reg. 13,529, 13,530 (Mar. 20, 2026) (hereinafter “Fee Study NPRM”).

²⁹ See 17 U.S.C. § 708(a)(1); (b).

³⁰ Fee Study NPRM at 13,531-32.

³¹ Letter from Maria Pallante to the Chair of the House Subcomm. on the Legislative Branch (May 9, 2016), <https://www.copyright.gov/reports/usco-it-funding-strategy.pdf>.

services, which generally hover around 50 percent.³² The NPRM does not argue that a 268% price hike is “necessary to cover the reasonable costs incurred” in administering GRNW, or would improve services for news publishers but, instead, makes a misguided statement: “due to the relative inelasticity of the demand ... the additional revenue from [GRNW and photographic and non-photographic databases] fees can subsidize group registrations used primarily by individuals, for which greater cost recovery is impracticable,”³³ and states because “these options primarily serve corporate applicants, we are allocating a greater portion of costs to these fees.”³⁴ The attached letters from over 30 publishers and state press associations demonstrate unequivocally the economic realities of publishers big and small, the difficulty of absorbing additional costs while keeping their communities informed and investing in high-quality journalism, and the devastating effect a massive registration fee increase would likely have on the sector’s registration practices. For example:

- *The Bloomfield Democrat*: “In the past five years, the economic effects of COVID, inflation, increased postal costs, insurance costs that have more than doubled, and reduced revenue due to the chaotic social media landscape have made it very difficult to survive despite a subscriber base that has only slightly decreased.”
- *CherryRoad Media Inc.*: “With knowledge drawn from our digital-forward approach, I write in opposition of the proposed fee increase ... This 3.5-fold increase is untenable for news publishers already struggling to provide quality journalism amid industry-wide economic challenges.”
- *Trib Total Media*: “Registering online content is particularly important considering the new challenges we face with AI, and while the recent adoption of the GRNW option is a significant improvement, the proposed increase would make the option unfeasible for many community publishers...”
- *Indianola Independent Advocate*: “As an online first newspaper, we employ two full-time journalists as well as 10 others in supporting roles. ... We work continuously to convince our readers that they need accurate local news, versus the assumptions they find, and often believe, on social media. ...To protect our content and enforce our rights when necessary, we must be able to register all of our copyrightable works efficiently – something we have not done before.”
- *McClatchy Media Company, LLC*: “Despite the critical role we play in the communities we serve, we are struggling just like many of our fellow publishers across the nation.”

³² Fee Study NPRM at 13,535. The NPRM notes that inflation has been only 23% since 2020, and is expected to be 3% per annum between 2026-2030. Similarly, the proposed hike for GRNW is exceeded only by a 333% increase in fees to register a mask work; however, it appears from the public record that appetite for mask work registration is minimal or non-existent.

³³ Fee Study NPRM at 13,534.

³⁴ Fee Study NPRM at 13,534.

From October 2023 to April 2026, McClatchy's portfolio experienced a 44.5% decline in unique pageviews and a 40.1% decline in total pageviews, representing a sustained erosion of both reach and volume across the entire footprint. ... To protect quality local journalism in America, copyright registration needs to be accessible to all publishers”

- *The Economist Group*: “Even for established publishers, copyright registration is not an unlimited compliance budget. A sharp increase would require publishers to reconsider the scope, frequency and economics of their registration programmes. For some, it may mean fewer registrations or trade-offs against other activities that support journalism and enforcement.”
- *The New York Times*: “As this Office is aware, our ability to serve as an essential source of journalism for readers around the world depends on our ability to receive fair compensation for our work... To protect journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.”
- *The Atlantic Monthly Group LLC*: “Our enduring commitment to inform our readers faces significant, industry-wide economic headwinds. ... The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges for our industry.”
- *Vox Media, LLC*: “This is particularly important as publishers navigate a rapidly-evolving digital landscape, including the unauthorized use of content by third parties and emerging AI technologies. Effective and accessible copyright registration remains a critical component of protecting original reporting and creative work.”
- *Lee Enterprises*: “Large AI companies routinely scrape our intellectual property without authorization and use it in a manner that reduces our referral traffic, threatening advertising and subscription-based monetization strategies. To protect our content and enforce our rights, when necessary, we must be able to register all our copyrightable works efficiently – something we started in October 2024 for all our major news websites.”

Several state associations further described the challenging economic conditions facing their local press:

- *Missouri Press Association*: “Our daily papers currently pay around \$90 per month, or \$1,080 annually, for copyrighting. That may not sound like much, but by virtue of operating on shoestring budgets, they simply cannot afford any kind of an increase. Some Missouri papers have stopped entering our annual state newspaper contest, in order to save money on the entry fees. Others have dropped health-care insurance for their employees.”

- *Hawai'i Publishers Association*: describing reduced printing schedules and economic challenges to three leading Hawai'i publishers and expressing concern the fee increase will limit publishers' ability to register their content.
- *Washington Newspaper Publishers Association*: "We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content. ... The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start."
- *Minnesota Newspaper Association*: "Despite representing the most civically-engaged state and a passionate dedication to playing an integral role in the communities they serve, Minnesota is not immune to the overall challenges facing the news media industry. ... [Local News Initiative's] 2025 report revealed Minnesota's first news desert ... Minnesota publishers are innovating – embracing new revenue models and engagement, including April 30, 2026, the inaugural Minnesota Local News Giving Day. Significant costs have led to a decline in print and an increased utilization of digital-first strategies, underscoring the importance of protecting news media content online from unauthorized misappropriation."
- *North Carolina Press Association*: "Despite their integral role in the communities they serve, far too many of our members are struggling. Our member publishers' revenues have declined drastically in recent years, following over a decade of slow decline of local journalism that has already placed considerable stress on far too many publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and in many cases, shut down entirely."
- *Texas Press Association*: "The overwhelming majority of the 360 Texas newspapers we represent are small businesses. Many, in fact, are prototypical "mom-and-pop" family-owned publications. ... The hammers keep falling from every direction. Fuel costs, office supplies, plates and newsprint ... [are]forcing us to look at reducing our print quantities, page counts, how much color we can print. ... For small mom & pop newspapers, the rising expenses likely mean a sharp reduction in your own paycheck. This is our reality. Every added dollar must be absorbed somewhere, and for many there truly is very little left to trim." (internal quotation marks removed)
- *Utah Press Association*: "These economic pressures have forced difficult decisions across the state, including reductions in newsroom staffing, decreased coverage in rural and underserved areas, and increased strain on independently owned publications that serve as the backbone of local journalism in Utah."

Each letter expresses concern that the proposed increase will reduce news publishing registrations and serves as economic evidence of high elasticity that this rulemaking process must take into account when considering the GRNW fee.

The NPRM inaccurately assumes that GRNW and the photographic and non-photographic database applications are the only applications “primarily serving” corporate filers and therefore best placed to subsidize everyone else. This assumption is not supported by data. In fact, many corporate filers use the standard application with Microsoft registering works such as *Age of Empires IV*³⁵ and Microsoft 365 Products,³⁶ Netflix registering episodes from TV shows *Bridgerton*³⁷ and *Stranger Things*,³⁸ and Oracle registering Java Standard Edition 11,³⁹ to mention a few. Users of the standard application come in all sizes, including the largest companies in the world. Meanwhile, news publishers also range in size, including individual publishers and nonprofit charities as described above.⁴⁰

The NPRM and supporting FRD study fall short of setting out the record required to support a severe differential treatment of news publishers. The study includes no elasticity analysis of news publishers (as compared with prior fee study methodologies), who, as demonstrated herein, are actually highly price sensitive. Nor is there thorough analysis regarding publishers’ relative elasticity as compared to other filers, as would be required to promulgate this level of subsidization. From an economic analysis perspective, the fee study does not adequately document, interrogate, and justify the disproportionate GRNW fee hike at the level the Administrative Procedures Act and the Copyright Act require.

While we are supportive of the Office having the resources it needs, the logic underlying the proposed GRNW increase is better suited to the Office’s concurrent notice of inquiry regarding alternative fee structures for registration, which NMA looks forward to participating in.⁴¹ It is premature, however, to move forward with a differentiation based on presumed corporate status in piecemeal fashion, especially given that entity status differentiation is an alternative

³⁵ Microsoft Corporation, *Age of Empires IV*, U.S. Copyright Registration No. TX 9-136-225 (Apr. 25, 2022).

³⁶Microsoft Corporation, *Microsoft 365 Products, Apps, and Services*, U.S. Copyright Registration No. TX 9-472-761 (Dec. 12, 2024).

³⁷Netflix Worldwide Entertainment, LLC, *Bridgerton: Season 4: Episode 1: “The Waltz”*, U.S. Copyright Registration No. PA 2-565-487 (Feb. 5, 2026).

³⁸ Netflix Worldwide Entertainment, LLC, *Stranger Things: Season 5: Episode 7, Chapter 7, The Bridge*, U.S. Copyright Registration No. PA 2-575-821 (Jan. 5, 2026).

³⁹Oracle America, Inc., *Java Standard Edition 11*, U.S. Copyright Registration No. TX 9-411-036 (July 3, 2024).

⁴⁰ Some publishers, whether nonprofit or for-profit, also derive support from philanthropic giving. See Jennifer Preston et al., *Final Report: Journalism and Philanthropy: Growth, Diversity & Potential Conflicts of Interest* (Oct. 2023), <https://www.norc.org/research/projects/journalism-and-philanthropy-growth-diversity-and-potential-conflicts-of-interest.html>.

⁴¹ Alternative Fee Structures for Registration, 91 Fed. Reg. 14724 (Jun. 24, 2026).

fee structure of a kind “expected to be technically feasible within the Enterprise Copyright System,” yet to be adopted.⁴²

ii. The Proposed GRNW Increase Does Not Give Due Consideration to the Objectives of the Copyright Act.

Because the NPRM does not adequately account for news publisher price elasticity, the expected depression on registration rates is contrary to the objectives of the Copyright Act. Those objectives should guide the Office to ensure that news publishers *continue to increase* rates of registration, both as a matter of general policy and due to publishers’ specific historical and current experiences in registering their content. Many publishers missed out on efficient registration that the NPRM notes is necessary to avoid “undue barriers to access” due to the historical deficits in the options for registering news.⁴³ Maintaining the current fee will best mitigate the historic inequity and current shortcomings in the registration system.

The broader public interest strongly supports incentivizing comprehensive participation in registration of news media content. News content is one of the earliest categories of copyright-protected material, with the Framers clearly articulating the complementary goals of supporting the press through the First Amendment and incentivizing publishers through the Copyright Clause. News publications are typically “selected” for the Library of Congress’ collections, unlike other categories that may be more ephemeral or otherwise unselected. Newspapers and magazines are America’s yearbooks and historians, and the public record and research opportunities are enriched by publishers’ voluntary registration. An overly aggressive fee increase may lead to many publishers simply choosing not to register their digital works, weakening protection for a huge chunk of American journalism. All else equal, the Office should consider having other filers subsidize news registrations, not the other way around.

Finally, the NPRM states that “while the proposed increase in fees may reduce service volume, at least temporarily, the decrease should be offset by a more consistent long-term level of cost recovery.”⁴⁴ This logic is dangerous and contrary to the legal standard, as the success of copyright registration must be measured by participation in the system, not just costs recovered.

d. The Proposed GRNW Fee Increase Inappropriately Singles Out the Press.

By singling out news websites for the largest fee increase of all, the proposed excessive GRNW fee is uncomfortably close to a differential tax on the press, which the Supreme Court has expressly struck down. The Government must be cautious when targeting an industry whose

⁴² Fee Study NPRM at 13,530.

⁴³ See Fee Study NPRM; Group Registration of Updates to a News Website, 89 Fed. Reg. 311 (Jan. 3, 2024).

⁴⁴ Fee Study NPRM at 13,533.

unique importance in supporting our democracy is enshrined in the Constitution. As the Supreme Court noted in a tax context, “[t]here is substantial evidence that differential taxation of the press would have troubled the Framers of the First Amendment. The role of the press in mobilizing sentiment in favor of independence was critical to the Revolution.”⁴⁵ Raising of revenue alone “cannot justify the special treatment of the press” and the “very selection of the press for special treatment threatens the press not only with the current *differential* treatment, but also with the possibility of subsequent differentially *more burdensome* treatment.”⁴⁶ Therefore, a “tax that singles out the press, or that targets individual publications within the press, places a heavy burden on the State to justify its action.”⁴⁷

While fees for copyright registration may be calibrated to the specific services offered, that is not what happened here. The NPRM proposes that news websites accept a 3.5-fold increase *by virtue of the identity of the applicants as news organizations*, to maintain lower fees for other content producers and subsidize unrelated functions. This differential and more burdensome treatment of the press to obtain the benefits of copyright is not permitted. The Office should limit increases to GRNW to increases for other fees, such as the Standard application.

e. Before Increasing Costs, the Office Must Promptly Remove the Content-Based Limitation That Negatively Impacts the Efficacy of GRNW.

To increase efficiency and certainty and to achieve cost reductions, the Office should amend the rule to broaden or delete the definition of a “news website.”⁴⁸ This issue, along with other recommended changes that NMA stands by, were previously discussed in detail in NMA’s comments to the original GRNW NPRM.⁴⁹

The removal or broadening of the definition of “news websites” is particularly important given that online publications are often segmented in response to user demand and how online news is discovered, accessed, and consumed by readers. While many publications cover a range of news content, others provide a broad range of news about particular subject matter areas, and specialization on a topic does not mean those dynamically updated websites do not publish

⁴⁵ *Minneapolis Star v. Minnesota Comm’r*, 460 U.S. 575, 583-5 (1983).

⁴⁶ *Minneapolis Star v. Minnesota Comm’r*, 460 U.S. 575, 586-588 (1983).

⁴⁷ *Minneapolis Star v. Minnesota Comm’r*, 460 U.S. 575, 592-3 (1983). See also *Ark. Writers’ Project, Inc. v. Ragland, Comm. of Rev. of Ark.*, 481 US 221, 228 (1987) (“Our cases clearly establish that a discriminatory tax on the press burdens rights protected by the First Amendment.”).

⁴⁸ Interested stakeholders uniformly agreed with this request, and the Office can change the subject matter eligibility without engaging in notice and comment process.

⁴⁹ NMA maintains its additional requests, including to revisit the statements regarding the independent economic value test, which while not authoritative, are confusing and unnecessary in the context of administering the registration system and could depress participation and devalue publishers’ investments in high-quality journalism. News/Media Alliance, Comment Letter on Proposed Rulemaking to Create a New Group Registration of Updates to a News Website, at 11 (Feb. 20, 2024), <https://www.newsmediaalliance.org/wp-content/uploads/2024/02/News-Media-Alliance-USCO-NPRM-Comments-2.20.24.pdf>. See also Joint GRNW Letter.

news comparable to traditional newspapers. The current definition creates uncertainty for some publishers, and potential denials would leave them without any realistic way to register their works, an end-result we believe the Office does not intend. While the Office has shown leniency in some applications, the fundamental uncertainty as to the scope of the rule increases publishers' wariness around the option and increases costs for the Office as it makes content-based determinations. All stakeholders would be well-served by the elimination of the subject matter limitation.

We urge the Office to consider broader changes and for the completion of IT modernization before the Office considers notable amendments to the GRNW registration fee. Until then, the Office should limit costs to news publishers who have only recently become able to meaningfully protect their works.

II. The Office Should Reduce Increases to Fees for Reconsideration and Special Handling Workflows.

News publishers also have increased concerns about the costs associated with appeals and special handling, which are compounded by the need for updated GRNW regulatory language.

a. Requests for Reconsideration.

We urge the Office to limit any increases to fees for requests of reconsideration, which are currently proposed to increase by over \$200 for the first appeal and \$500 for the second appeal. Considering GRNW's subject matter limitation – which significantly increases examination costs as the Office is required to act as a First Amendment arbiter – the ability of publishers to appeal registration denials is vital to retain eligibility for statutory damages. More generally, Copyright Office appeals serve an important public interest, clarifying the state of copyright law in areas of uncertainty and protecting rightsholders against erroneous decisions that would jeopardize their investments in new, original content production. Unfortunately, as the Office's own records will show, news organizations' appetites for the reconsideration process are already quite elastic, with some declining to appeal out of cost sensitivity, despite denials being on content-based grounds and not due to lack of copyrightable subject matter, deposit, fee, or authorship/ownership information provided. This outcome depletes the public record and diminishes the incentives to register.

b. Special Handling.

Similarly, the Office proposes a substantial increase to the cost of special handling, raising the cost of expedited processing by 37.5 percent from \$800 to \$1,100. This is almost double the cost recovery amount of \$659. While we understand the rationale for charging more for expedited registration, special handling is important for publishers and other rightsholders alike

as a facilitator of meaningful enforcement. It should remain attainable for registrants of all sizes.

This is especially true given ongoing enforcement challenges combined with delays in registration processing times. The proliferation of AI systems and their systemic and unauthorized uses of publisher works places unprecedented burdens on publishers, and many are actively litigating against such uses. We are grateful for the Office’s recognition of the difficulties surrounding transparency by AI developers and deployers, and ask it to connect the dots by not increasing the cost of special handling when investigation or obfuscation makes it necessary to rush a registration application in connection with pending or ongoing litigation.⁵⁰ It is imperative that special handling be accessible to publishers so that they can continue to participate in and help shape this moment of judicial clarity.⁵¹

III. The Proposed Fee Schedule Should Be Re-Examined as a Whole in Light of Broader Deficiencies.

The fee study raises additional, more general concerns that should prompt reexamination before proceeding, especially with respect to IT modernization.

a. The Fee Study Does Not Adequately Balance Cost Recovery with Public Interests and Fails to Rationally Connect the Proposed Increases to the Underlying Facts.

The NPRM as a whole does not adequately balance cost recovery with public interest in encouraging copyright registrations. With an average increase of 43 percent, many proposed fees outpace inflation, despite declining services due to an outdated IT system. Considering that rightsholders, too, already struggle with inflation in general costs and services, their ability to deal with well-above actual inflation increases in Copyright Office fees may be limited.⁵²

⁵⁰ See, e.g., Artificial Intelligence and Copyright, 88 Fed. Reg. 59,942 (Aug. 30, 2023).

⁵¹ See The White House, *National Policy Framework for Artificial Intelligence* (Mar. 20, 2026), <https://www.whitehouse.gov/wp-content/uploads/2026/03/03.20.26-National-Policy-Framework-for-Artificial-Intelligence-Legislative-Recommendations.pdf> (noting that the Administration “supports allowing the Courts to resolve this issue. Similarly, Congress should not take any actions that would impact the judiciary’s resolution of whether training on copyrighted material constitutes fair use.”)

⁵² See Lucia Mutikani, *US Business Activity Cools Further, No Widespread Price Increases*, Reuters (Sep. 23, 2025), <https://www.reuters.com/world/us/us-business-activity-moderates-further-september-2025-09-23/>; U.S. Chamber of Com., *Revenue Concerns Surge As Inflation Remains Dominant Challenge for Small Businesses* (Mar. 26, 2025), <https://www.uschamber.com/small-business/revenue-concerns-surge-as-inflation-remains-dominant-challenge-for-small-businesses>.

Meanwhile, the Office’s modernization efforts, which may increase efficiency and lower costs, is not planned to be available until 2028 at the earliest.⁵³

As noted above, the NPRM errs in stating “while the proposed increase in fees may reduce service volume, the decrease should be offset by a more consistent long-term level of cost recovery.”⁵⁴ This statement is contrary to the Office’s mission to encourage participation in the copyright system. As the Office itself opined in the last fee-setting proceeding, “the Copyright Office must set fees such that each new fee recovers a reasonable percentage of the cost of processing the claim, but **does not result in a more permanent disincentive to register works** and a long-term decrease in fee receipts.”⁵⁵ Anticipated volume reduction is a red flag and a reason to not substantially increase the fee for a specific service. Meanwhile, it is premature for the Office to count on mitigating potential price increases through its separate Notice of Inquiry “on possible future alternative fee structures,” given the project has just kicked off and no benefits will be realized until at least the deployment of the ECS.⁵⁶ At the same time, the NPRM fails to consider any potential efficiency increases resulting from IT modernization that may justify limiting any fee increases – instead, the only forward looking price adjustment the NPRM considers is potential inflation increases.

b. The Proposed Cross-Subsidization of Other Copyright Office Services is Disproportionate and Far Exceeds the Last Fee Study’s Approach.

While the Office may have reasonable authority to engage in cross subsidization of fee-bearing services in light of the objectives of the Copyright Act, the proposed fee schedule diverges from existing practice and goes past permissible use of this offsetting authority. Specifically, the Office should reconsider (i) the amount and type of indirect costs charged to registration options and (ii) the amount of subsidization proposed to rarely utilized fees.

Rather than being closely based on services provided to applicants, the FRD study models a system where the registration program is used to subsidize different programs, including public education, international policy, rate-setting and licensing legal work, and collection demands on behalf of the Library of Congress. In the last fee-setting proceeding, the Office opined that it may “set fees that account for indirect costs of providing services, and to use fee revenue from some services to offset losses from others for which the fees are kept low to encourage the public to take advantage of the service.”⁵⁷ But while under this reading, the Office may offset

⁵³ Transcript of *Copyright Public Modernization Committee Public Meeting February 2026* (Feb. 25, 2026), https://tile.loc.gov/streaming-services/iiif/media:webcasts:2026:260225cio1300:260225cio1300-1920x1080_6000/full/full/0/full/default.txt.

⁵⁴ Fee Study NPRM at 13,533.

⁵⁵ Copyright Office Fees, 85 Fed. Reg. 9,374, 9,377-8 (Feb 19, 2020) (emphasis added).

⁵⁶ Alternative Fee Structures for Registration, 91 Fed. Reg. 14724 (June 24, 2026).

⁵⁷ Copyright Office Fees, 83 Fed. Reg. 24,054, 24,055 (May 24, 2018).

costs for some *services* through fees for other *services*, it is not clear that the Office has authority to impose surcharges on registration to support not fee-bearing governmental functions.

It appears that the last fee setting proceeding accordingly excluded non-service functions and offices from the calculations, while the current proposal goes beyond this limit with the average overhead burden ***nearly five times higher in 2026 than in 2018***. Whereas the previous fee study excluded "costs associated with the policy and international programs, the mandatory deposit program, and programs dedicated to providing general education and information to the public,"⁵⁸ the FRD's revised overhead pool includes "*all personnel and non-personnel costs*" (emphasis added).⁵⁹ The expanded indirect cost pool would require registrants to pay for divisions not previously funded by copyright registration. Group registrants are seemingly being asked to disproportionately subsidize these divisions. While, based on available data on a cross-section of registration categories, in 2018 the Copyright Office required approximately ***\$1.14 in overhead costs to support every \$1 of direct work*** for a cross-section of applications, by 2026 this overhead ratio has ***skyrocketed to \$5.41 for every \$1 of direct work*** – nearly five times higher.⁶⁰ To maintain sufficient incentives for participation in copyright registration, we urge the Office to remove these additional indirect costs, which instead should continue to be well-supported through appropriated dollars and/or offset through the value of works provided for the Library's collections.

The Office should also look for places to adopt fees for less utilized registrations and other services that are more closely aligned with cost recovery. Services such as registration of claims in restored copyrights, designation of agent under 17 U.S.C. 512(c)(2), preregistration of certain unpublished works, and services related to pre-1972 sound recordings all have limited user bases and high calculated costs of service, yet are heavily subsidized to keep the fees well below cost recovery.

c. IT Modernization Should Be Addressed and Funded, but Separate from Hikes to Registration Options, Given the Delay and State of the Current Registration System.

NMA supports the Office's IT modernization efforts and remains optimistic it will provide considerable advantages to the Office, applicants, and the general public. We also, however,

⁵⁸ Karyn A Temple, Register of Copyrights, *Proposed Schedule and Analysis of Copyright Fees to Go into Effect in Spring 2020*, 11 (2019), <https://www.copyright.gov/rulemaking/feestudy2018/proposed-fee-schedule.pdf>.

⁵⁹ Fed. Rsch. Div., Libr. of Cong., *U.S. Copyright Office FY2024 Fee Study: Cost Assessment Report* 6-7 (2025).

⁶⁰ 2018 numbers exclude IT modernization costs. See Fed. Rsch. Div., Libr. of Cong., *U.S. Copyright Office FY2024 Fee Study: Cost Assessment Report* 18–31 (2025); Booz Allen Hamilton, *2017 Fee Study Report app. B* (2017); U.S. Copyright Office, *2017 Revised Fee Study Model Summary* (2017) (ratio derived by comparing and averaging indirect costs to direct costs for most registration categories included in both 2018 and 2026 fee studies).

believe that additional funding for IT modernization must be decoupled from registration fee increases and come from Congressional appropriations or Library support instead, especially considering the state of the current registration system. This approach would also be most consistent with the last fee schedule, where the Office reduced the proposed fee increases for certain options in light of concern over the impact of added modernization costs.⁶¹

The NPRM notes that indirect costs included in the calculated cost of delivery “include the costs of IT infrastructure and modernization.”⁶² Since the advent of the Office’s IT modernization efforts eight years ago, there has been little progress noticeable to rightsholders wishing to register their works, in part because of earlier prioritization to the recordation, licensing, and public records systems, and perhaps internal deposit workflows. Throughout this time, the Office has been granted appropriations for the modernization project and it most recently requested an increase of \$6.8 million over three years for the development of the Enterprise Copyright System’s registration component.⁶³ In addition, during the last fee cycle, registration fees were raised in part to fund modernization efforts, but those additional funds have not yet translated to improvements for copyright registration applicants.

Copyright applicants already stuck with a deficient, outdated system should not be asked to subsidize IT development even more. To make meaningful advances in registration IT for external users, we strongly support additional appropriated resources to “supplement [the already appropriated] amounts to keep pace with [the] timeline for ECS planning and development and to account for the increased costs of IT services.”⁶⁴

IV. Conclusion.

An efficient and easily accessible copyright registration system is vital for publishers to protect their works and to ensure the sustainability of high-quality journalism across America. Without reasonable fees for copyright registration, the full benefits and incentives of our copyright system are unreachable, ultimately harming the public interest. While we strongly support the Office having the resources it needs to fulfill its role as the facilitator of America’s copyright system, news publishers are not in a position to subsidize other users of the Office’s services. We therefore urge the Office to withdraw its proposed increases to GRNW, reduce the proposed increases for special handling and appeals, and make any further adjustments necessary to ensure that rightsholders of all sizes can continue to use the Office’s services.

⁶¹ Copyright Office Fees, 85 Fed. Reg. 9,374, 9,378 (Feb. 19, 2020).

⁶² Fee Study NPRM at 13,531.

⁶³ Hearing on the Fiscal 2026 Budget Request Before the Subcomm. on the Legis. Branch of the H. Comm. on Appropriations, 119th Cong. (Apr. 8, 2025) (statement of Shira Perlmutter, Register of Copyrights and Dir., U.S. Copyright Off.), <https://www.copyright.gov/laws/hearings/US-Copyright-Office-Statement-for-FY26-House-Legislative-Branch-hearing-April-8-2025-FINAL.pdf>.

⁶⁴ Fee Study NPRM at 13,532.

Sincerely,

- News/Media Alliance
- America's Newspapers
- Allied Daily Newspapers of Washington
- Arizona Media Association
- Arkansas Press Association
- California News Publishers Association
- Colorado Press Association
- Connecticut Daily Newspaper Association
- Florida Press Association
- Georgia Press Association
- Hawaii Publishers Association
- Hoosier State Press Association
- Illinois Press Association
- Iowa Newspaper Association
- Kansas Press Association
- Kentucky Press Association
- Louisiana Press Association
- Maine Press Association
- Massachusetts Newspaper Publishers Association
- MDDC Press Association
- Michigan Press Association
- Minnesota Newspaper Association
- Mississippi Press Association
- Missouri Press Association
- Montana Newspaper Association
- Nebraska Press Association
- Nevada Press Association
- New Jersey Press Association
- New Mexico Press Association
- New York News Publishers Association
- New York Press Association
- Newspaper Association of Idaho
- North Carolina Press Association
- North Dakota Newspaper Association
- Ohio News Media Association
- Oklahoma Press
- Oregon Newspaper Publishers Association
- Pennsylvania NewsMedia Association
- Rhode Island Press Association
- South Carolina Press Association
- South Dakota Newspaper Association
- Tennessee Press Association
- Texas Press Association
- Utah Press Association
- Vermont Press Association
- Virginia Press Association
- Washington Newspaper Publishers Association
- West Virginia Press Association
- Wisconsin Newspaper Association
- Wyoming Press Association

APPENDIX A

This Appendix includes letters opposing the proposed GRNW fee increase and discussing the publishing industry landscape, including the price elasticity of small, local publications. Each letter is from either an individual publisher or a state press association, collectively representing thousands of properties across the country.



CherryRoad Technologies Inc.
6 Upper Pond, 2nd Floor
Parsippany, New Jersey 07054

TEL: 973-402-7802
FAX: 973-402-7808
www.cherryroad.com

May 1, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

CherryRoad Media Inc. is addressing the local news crisis with a novel but straightforward approach. We focus on using technology to strengthen communities through their local newspapers. We believe the newspaper is an essential resource for developing strong communities. By using technology, we can supplement the printed newspaper with enhanced digital capabilities.

With knowledge drawn from our digital-forward approach, I write in opposition of the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. This 3.5-fold increase is untenable for news publishers already struggling to provide quality journalism amid industry-wide economic challenges.

CherryRoad Media owns and operates more than 100 newspapers across 19 states. CherryRoad Media's priority is to keep local, local. We strive to serve the communities we operate in by engaging in the coverage of important local and regional stories and events. By leveraging our technology expertise, we are able to deliver effective technical and media solutions to our customers and local organizations.

I founded CherryRoad Media in 2020 with the goal of saving local newspapers that were in danger of being closed. This was prompted by my passion for journalism and communication, and a calling to address the acute and ongoing decline in local news investment. As I described to the *Wall Street Journal* in 2025, tech giants have disrupted the local media landscape for decades, siphoning away the advertising revenue that once sustained local newsrooms.¹

These challenging economic conditions and competitive misalignment will be made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our intellectual property without authorization and use it in a manner that reduces our referral traffic, threatening advertising and subscription-based monetization strategies.

To protect our content and enforce our rights when necessary, we must be able to register all of our copyrightable works efficiently.

Registering online content is especially important in the current environment, and while the recent adoption of the GRNW option is a significant improvement, the proposed increase would make the option unfeasible, or force trade-offs or reductions in other areas. The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges the industry is already facing.

¹ <https://www.wsj.com/business/media/he-wanted-to-fix-local-news-its-harder-than-he-thought-e56b4f12>



Local news is a public good, as crucial to our democratic systems as utilities are to our homes and businesses.

To protect local news in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeremy Gulban". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeremy Gulban
CherryRoad Media CEO



PO Box 423, Indianola, Iowa 50125 • 515-961-2511

May 1, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Indianola Independent Advocate, a community news publisher in Iowa, in opposition of the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. This 3.5-fold increase is untenable for news publishers already struggling to provide quality journalism amid industry-wide economic challenges.

The Independent Advocate was founded in 2019 and has been providing essential journalism to our community ever since. As an online first newspaper, we employ two full-time journalists as well as 10 others in supporting roles, and we provide local businesses and other advertisers with a trusted medium to reach consumers. We cover everything from local politics to school events and sports. While we charge for subscriptions, we allow everyone to read our election coverage, opinion columns and read and place obituaries at no charge, ensuring that local voices are heard and that our readers feel connected and empowered in their communities.

Despite the critical role we play in the communities we serve, we are struggling just like many of our fellow publishers across the nation. We work continuously to convince our readers that they need accurate local news, versus the assumptions they find, and often believe, on social media. At the same time, we are creating in a sense, a new, digital-first business model, that readers sometimes struggle to understand or adopt.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our intellectual property without authorization and use it in a manner that reduces our referral traffic, threatening advertising and subscription-based monetization strategies. To protect our content and enforce our rights when necessary, we must be able to register all of our copyrightable works efficiently – something we have not done before.

Registering online content is particularly important considering the new challenges we face with AI, and while the recent adoption of the GRNW option is a significant improvement, the proposed increase would make the option unfeasible for us, or force trade-offs or reductions in other areas. The 3.5-fold

increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges the industry is already facing.

To protect local journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amy Duncan".

Amy Duncan
Indianola Independent Advocate



April 24, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of Lee Enterprises, a national publisher with newspapers in 72 states in opposition of the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. This 3.5-fold increase is untenable for news publishers already struggling to provide quality journalism amid industry-wide economic challenges.

Lee Enterprises was founded in 1890 in Iowa, by A.W. Lee. While our roots are in Iowa, our reach now spans communities across the country. We believe our fundamental duty is to watch out for our communities through the exercise of our First Amendment rights and responsibilities.

With a team of almost 700 full-time journalists, we provide in-depth coverage of local community news, politics, business, and high school, college and professional sports. We also provide local businesses and other advertisers with a trusted medium to reach consumers.

Despite the critical role we play in the communities we serve, we have had to navigate significant headwinds over the last several years including revenue shifts and organizational restructuring.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our intellectual property without authorization and use it in a manner that reduces our referral traffic, threatening advertising and subscription-based monetization strategies. To protect our content and enforce our rights, when necessary, we must be able to register all our copyrightable works efficiently – something we started in October 2024 for all our major news websites.

Registering online content is particularly important considering the new challenges we face with AI, and while the recent adoption of the GRNW option is a significant improvement, the proposed increase would make the option unfeasible for us, or force trade-offs or reductions in other areas. The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges the industry is already facing.

To protect quality journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Astrid Garcia

Vice President Human Resources & Legal

5/1/2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of McClatchy Media Company, a national publisher in 30 markets in opposition of the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. This 3.5-fold increase is untenable for news publishers already struggling to provide quality journalism amid industry-wide economic challenges.

With a presence in multiple communities across the US, McClatchy Media Company has a mission to inform, engage, and serve audiences with accurate, credible, relevant content and experiences; deliver them through dynamic data-driven digital platforms and our retail network; continuously learn from our audiences to improve outcomes for users, partners, and communities. We employ 606 employees to cover everything from local news, opinion, sports, politics and accountability, ensuring that breaking news and lifestyle and entertainment is delivered to our readers.

Despite the critical role we play in the communities we serve, we are struggling just like many of our fellow publishers across the nation. From October 2023 to April 2026, McClatchy's portfolio experienced a 44.5% decline in unique pageviews and a 40.1% decline in total pageviews, representing a sustained erosion of both reach and volume across the entire footprint.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our intellectual property without authorization and use it in a manner that reduces our referral traffic, threatening advertising and subscription-based monetization strategies. The decline accelerated most sharply between Q4 2024 and Q1 2025, when unique pageviews fell roughly 26% over just five months, accounting for a disproportionate share of the overall loss and marking the transition from cyclical softness into a structurally lower baseline.

To protect our content and enforce our rights when necessary, we must be able to register all of our copyrightable works efficiently.

Registering online content is particularly important considering the new challenges we face with AI, and while the recent adoption of the GRNW option is a significant improvement, the proposed increase would make the option unfeasible for us, or force trade-offs or reductions in other areas. The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges the industry is already facing.

To protect quality local journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Tony Hunter

Chairman & Chief Executive Officer

thunter@mcclatchy.com

EA Julie Pendley, jpendley@mcclatchy.com, 916-835-5924

The Atlantic

May 1, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of The Atlantic Monthly Group LLC, publisher of *The Atlantic*, in opposition to the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. Protecting copyrights in online journalism is more critical to newsrooms – and to our democracy – than ever. The proposed 3.5-fold fee increase is untenable for publishers already struggling amid the rise of general artificial intelligence (AI) companies scraping and exploiting news websites without permission and upending digital media revenue strategies.

Founded in 1857 in Boston, *The Atlantic* magazine began by publishing commentary on opposition to slavery, alongside coverage of literature, politics, and arts, from great American writers, including Ralph Waldo Emerson, Oliver Wendell Holmes, Harriet Beecher Stowe, and Henry Wadsworth Longfellow. Our founders believed that the free exchange of ideas across ideological lines was crucial to the great American experiment. We continue that tradition today with rigorous coverage of consequential political and social issues. We employ over 400 people to create and support our print and digital publications and reach nearly 1.5 million subscribers across all 50 states and internationally.

Our enduring commitment to inform our readers faces significant, industry-wide economic headwinds. AI companies routinely scrape our intellectual property without authorization and use it in a manner that reduces our website referral traffic, undermining advertising and subscription-based monetization strategies. To protect our content and enforce The Atlantic's rights when necessary, we must be able to register all of our copyrightable works efficiently.

To that end, the recent adoption of the GRNW option is a significant improvement, and The Atlantic has used this process to protect our work systematically since the fall of 2024. But the proposed fee increase could make the option unfeasible for us, and will force other tradeoffs or reductions. The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges for our industry.

To protect quality journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,
Allison Prevatt
Deputy General Counsel
The Atlantic Monthly Group LLC



Bloomfield Communications, Inc.

**The Bloomfield Democrat
Bloomfield Cable News
Bloomfield Democrat Online**

April 27, 2027

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

We are writing to you on behalf of *The Bloomfield Democrat*, a countywide newspaper in southern Iowa, in opposition of the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. This 3.5-fold increase is untenable for news publishers already struggling to provide quality journalism amid industry-wide economic challenges

The Bloomfield Democrat was founded in 1869 and has been providing essential journalism to our community ever since. We employ two full-time journalists as well as five others in supporting roles, and we provide local businesses and other advertisers with a trusted medium to reach consumers. We cover local politics and government, school events and sports, community events, the fine arts, features on local residents, and ensure that local voices are heard and our readers feel connected and empowered in their communities.

Despite the critical role we play in the communities we serve, we are struggling just like many of our fellow publishers across the nation. In the past five years, the economic effects of COVID, inflation, increased postal costs, insurance costs that have more than doubled, and reduced revenue due to the chaotic social media landscape have made it very difficult to survive despite a subscriber base that has only slightly decreased.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our intellectual property without authorization and use it in a manner that reduces our referral traffic, threatening advertising and subscription-based monetization strategies. To protect our content and enforce our rights when necessary, we must be able to register all of our copyrightable works efficiently – something we have not done before.



Bloomfield Communications, Inc.

**The Bloomfield Democrat
Bloomfield Cable News
Bloomfield Democrat Online**

Page 2

Registering online content is particularly important considering the new challenges we face with AI, and while the recent adoption of the GRNW option is a significant improvement, the proposed increase would make the option unfeasible for us, or force trade-offs or reductions in other areas. The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges the industry is already facing.

To protect local community journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Karen Spurgeon, Publisher

Scott Spurgeon, Editor

The Bloomfield Democrat

April 29 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis

I am writing on behalf of The Economist Group in opposition to the proposed fee increase for the Group Registration of Updates to a News Website application.

The Economist Group is an international media organisation and the publisher of *The Economist*. We produce journalism and analysis for readers in the United States and around the world, covering global politics, economics, business, science, technology, finance and culture. Copyright protection is central to our ability to invest in original journalism, maintain editorial independence, and protect the value of our reporting across print and digital formats.

We currently register U.S. copyright for both print and website content. That registration programme helps us maintain a public record of our works and preserves our ability to enforce our rights where our content is copied, scraped, republished or otherwise misused without authorisation.

We are concerned that the proposed 3.5-fold increase in the GRNW filing fee would materially increase the cost of registering online news content. Even for established publishers, copyright registration is not an unlimited compliance budget. A sharp increase would require publishers to reconsider the scope, frequency and economics of their registration programmes. For some, it may mean fewer registrations or trade-offs against other activities that support journalism and enforcement.

The proposed increase is particularly concerning because online news content is highly exposed to unauthorised copying and commercial exploitation. Generative AI has intensified this risk. Large technology companies and AI developers have used, or are alleged to have used, publisher content at scale to train and operate AI systems. AI-powered products can also reproduce, summarise or substitute for original journalism in ways that reduce referral traffic and undermine subscription, advertising and licensing models. In this environment, accessible copyright registration is more important.

The GRNW option is a welcome improvement because it recognises the practical reality of modern digital publishing. News websites are updated continuously, and publishers need a workable mechanism to register those updates. If the fee becomes disproportionately expensive, the practical benefit of the GRNW option will be weakened, reducing participation in the registration system at a time when the public record and enforceability of high-quality journalism should be strengthened.

The Economist Group supports the U.S. Copyright Office having the resources it needs to operate an efficient copyright system. Reasonable fee adjustments may be necessary from time to time. However, any increase should be carefully calibrated so that it does not create an undue barrier to registration or discourage participation by news publishers.

We therefore urge the Copyright Office to withdraw the proposed GRNW fee increase or, at minimum, reduce any increase to the lowest level necessary. Copyright registration should remain accessible to publishers that invest in original journalism and need a practical means to protect their works in a rapidly changing digital environment.

Sincerely

Oscar Grut

Chief legal officer | Group company secretary | Head of ESG

1-11 John Adam Street, London WC2N 6HT, United Kingdom

Tel. +44 (0) 20 7576 8000 | www.economistgroup.com



The New York Times
Company

April 30, 2026

Simone Procas
V.P. & Assistant General Counsel
T 212 556 7591
simone.procas@nytimes.com

620 8th Avenue
New York, NY 10018
nytimes.com

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis:

I am writing to you on behalf of The New York Times (“The Times”), a global news organization headquartered in New York, NY, in opposition to the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. This proposed 3.5-fold increase will be a burden for news publishers, particularly local news outlets, already struggling to provide quality journalism amid industry-wide economic challenges.

The Times has been providing groundbreaking, frontline coverage of the world’s events for 175 years in service of our mission: to uncover the truth and help people understand the world. We employ thousands of employees, including our journalists who investigate and report the news from more than 160 countries. This type of newsgathering requires tremendous effort and enormous resources. We pay salaries, conduct research, cover travel, provide security, and much more, which is possible thanks to our subscribers, advertisers, and licensees.

As this Office is aware, our ability to serve as an essential source of journalism for readers around the world depends on our ability to receive fair compensation for our work – and this has become more challenging due to the misconduct of many AI companies. These companies routinely and unlawfully scrape our intellectual property, and the intellectual property of other publishers, and then use it in a manner that substitutes for our journalism. As a result, we have been forced to dedicate increasing time and resources to content protection and enforcement measures. And to protect our content and enforce our rights, news organizations must be able to register copyrightable works efficiently.

While the recent adoption of the GRNW option is a significant improvement, the proposed increase in registration fees would substantially increase the spiraling costs news organizations incur simply to protect their content – costs we are concerned may become unaffordable for smaller and

Emily Chapuis
General Counsel
U.S. Copyright Office
April 30, 2026
Page 2

local news organizations. The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the significant economic challenges the industry is already facing.

To protect journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in blue ink that reads "Simone Procas". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Simone Procas

May 1, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of Trib Total Media, a dynamic community news organization with a multimedia network of products and services three key markets in Pennsylvania, to express opposition of the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. This 3.5-fold increase is untenable for news publishers already struggling to provide quality journalism amid industry-wide economic challenges.

We strive to improve people's lives each day by delivering the news they want and the information they need through our 2 daily newspapers, 14 community newspapers, and multiple digital properties including TribLIVE.com, TribLIVE High School Sports Network and the TribLIVE Local.

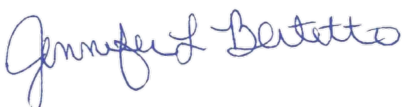
We have roots in local Pennsylvania journalism stretching back to 1799, and today Trib Total Media publications delivers news, information and advertising to portions of Allegheny, Westmoreland, Armstrong and Butler counties in Southwestern Pennsylvania. Despite our critical role in strengthening the communities we serve, Pennsylvania has not been immune to the significant contractions in the news media ecosystem. The Northwestern University Medill School of Journalism's "The State of Local News 2025" report estimates that our state has lost 42.1% of our newspapers since 2005.

As a multimedia news company, we are particularly sensitive to the impact on our industry by the rise of generative artificial intelligence (AI). Tough economic conditions will only get worse as large AI companies routinely scrape publishers' intellectual property without authorization and use it in a manner that reduces our referral traffic, threatening advertising, and subscription-based monetization strategies. To protect our content and enforce our rights, when necessary, we must be able to register all of our copyrightable works efficiently.

Registering online content is particularly important considering the new challenges we face with AI, and while the recent adoption of the GRNW option is a significant improvement, the proposed increase would make the option unfeasible for many community publishers, or force trade-offs or reductions in other areas. The 3.5-fold increase for news organizations is larger than any other proposed price change, despite the already-significant economic challenges the industry is already facing.

To protect community journalism in America, copyright registration needs to be accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,



Jennifer Bertetto
President and Chief Executive Officer

VOX MEDIA

May 4, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

We are writing on behalf of Vox Media, LLC (“Vox Media”) to express opposition to the proposed increase in fees for the Group Registration of Updates to a News Website (“GRNW”) application.

Vox Media is a national modern media company with a portfolio of widely recognized and influential editorial brands, including *Vox*, *New York Magazine*, *The Verge*, *SB Nation*, *The Cut*, *Eater*, *Vulture*, *The Dodo*, *The Strategist*, *Intelligencer*, *Thrillist*, and *Popsugar*. Vox Media employs hundreds of journalists and creators who produce original reporting and storytelling that informs and shapes conversations across news, culture, technology, sports, and more.

The GRNW option represents an important step forward in enabling publishers, like Vox Media, to register digital content. The proposed 3.5-fold fee increase, however, would significantly limit the utility of this tool and create new barriers to comprehensive registration.


This is particularly important as publishers navigate a rapidly-evolving digital landscape, including the unauthorized use of content by third parties and emerging AI technologies. Effective and accessible copyright registration remains a critical component of protecting original reporting and creative work.

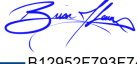
We respectfully urge the Copyright Office to reconsider the proposed increase and ensure that GRNW remains a practical and scalable option for publishers.

Sincerely,

Signed by:

D87827B26AE44B8...
Pam Wasserstein
President

Signed by:

62DA52295D414D7...
Ryan Pauley
President

DocuSigned by:

B12952F793F7441...
Brian Leung
General Counsel

VOX MEDIA, LLC



Florida Press Association
336 E. College Ave., Suite 304
Tallahassee, Florida 32301

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Florida Press Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent over 140 publishers across Florida. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite the essential role newspapers play in supporting informed communities and civic transparency, many of Florida's local publishers are struggling to remain viable. In recent years, the industry has continued to contract, with publications closing, consolidating, or reducing operations—limiting access to reliable local news.

Revenues have declined significantly due to falling print circulation and the shift of advertising to digital platforms, placing sustained financial pressure on publishers. As a result, many have been forced to cut staff, reduce coverage—especially in rural areas—or cease publication altogether.

Without thoughtful public policy and support, these trends will continue, further eroding access to trusted local information across Florida.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in black ink that reads "Carolyn B. Nolte".

Carolyn Nolte
President & CEO
Florida Press Association



45-614 Apapane Street • Kāneʻohe, Hawaiʻi 96744
Email: hawaii-publishers-association@gmail.com

April 30, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Hawaii Publishers Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application.

We represent five publishers across Hawaiʻi. Our members and industry colleagues provide essential journalism to our communities; keeping them informed, engaged, and entertained. By covering everything from local and state politics to school and community events and sports, regional and industry developments, our members and colleagues play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, too many of our members and colleagues are struggling. In the past five years, there have been multiple changes. The daily-printed Maui News transitioned to once-a-week in print in 2024, with the focus on delivering content online. The West Virginia-based owners, Ogden Newspapers, are reportedly pursuing a sale.

The Canadian owners of our colleagues at the Honolulu Star-Advertiser ceased printing on Saturdays in 2020, and bankruptcy forced them to sell their Oahu Publications group (which includes The Garden Island newspaper on Kauaʻi, MidWeek, and the Big Island newspapers -West Hawaii Today and Hawaii Tribune-Herald) to the Carpenter Media Group two years ago. That company is based in Alabama. The previously-four-section newspaper in Honolulu now has two sections.

These changes and others have reduced residents' access to high-quality journalism. Our member publishers' revenues continue to decline, and declining revenues have forced publishers to cut staff and reduce coverage.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Local newspapers have limited leverage when it comes to negotiating licensing deals, and copyright registration is key to protecting their content.

We commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would make the option economically unfeasible for publishers, and some may stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the minimum.

Thank you for considering this plea.

Sincerely,



Jay Hartwell
President



Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of Iowa Newspaper Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent 200 publishers across Iowa. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. In the past five years, Iowa has lost 32 publishers, significantly reducing residents' access to high-quality journalism. Our member publishers' revenues have declined significantly in recent years, following over a decade of slow decline of local journalism that has already placed considerable stress on far too many publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and in many cases, shut down entirely.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in blue ink that reads 'Debbie Anselm'.



Debbie Anselm
Executive Director
Iowa Newspaper Association
515-422-9050 | 219-406-5563
www.INAnews.com



Kansas Press Association, Inc.

Dedicated to serving and advancing the interests of Kansas newspapers

4011 SW 29th Street, #351 • Topeka, Kansas 66614 • Phone (785) 271-5304 • www.kspress.com

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Kansas Press Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent more than 160 publishers across Kansas. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. Over the past five years, Kansas has lost 10 publishers, significantly reducing residents' access to high-quality journalism. Our member publishers' revenues have declined sharply in recent years, following more than a decade of slow decline in local journalism, which has already placed considerable stress on far too many publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and, in many cases, shut down entirely. I am not one to succumb to theatrics, but here the description "the house is on fire" suits.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in ways that reduce their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when negotiating licensing deals, and to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content. The proposed 3.5-fold fee increase for GRNW would make the option economically unfeasible for most of our publishers, and we expect some to stop registering and others to never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers. We therefore join others in calling on you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Emily Bradbury
Executive Director, Kansas Press Association and the Kansas Newspaper Foundation



Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Minnesota Newspaper Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. MNA, and the Minnesota News Media Institute, our 501(c)(3) arm, represent more than 240 general-interest newspapers in the state. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite representing the most civically-engaged state and a passionate dedication to playing an integral role in the communities they serve, Minnesota is not immune to the overall challenges facing the news media industry. The Northwestern University Medill School of Journalism Local News Initiative estimates that the number of journalists in Minnesota decreased by 64% between 2005 and 2022, and its 2025 report revealed Minnesota's first news desert – a county without a local news outlet.¹

Minnesota publishers are innovating – embracing new revenue models and engagement, including April 30, 2026, the inaugural Minnesota Local News Giving Day.²

Significant costs have led to a decline in print and an increased utilization of digital-first strategies, underscoring the importance of protecting news media content online from unauthorized misappropriation.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are working with and encouraging our members to take advantage of this new opportunity and register their content.

¹ <https://localnewsinitiative.northwestern.edu/projects/state-of-local-news>

² <https://www.givemn.org/organization/Mnainstitute>



**MINNESOTA
NEWSPAPER
ASSOCIATION**

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Lisa Hills

Executive Director

Minnesota Newspaper Association | Minnesota News Media Institute



Trusted Local Journalism

371 Edgewood Terrace
Jackson, MS 39206
Phone 601.981.3060
mspess.org
mpa@mspess.org

OFFICERS & DIRECTORS

GEORGE R. TURNER
President
Greene County Herald
Leakesville

PETER IMES
Vice President
The Commercial Dispatch
Columbus

KEVIN COOPER
Past President
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Natchez

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MPA-MPS
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Oxford

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Journal, Inc.
Tupelo

LISA BRYANT
Pontotoc Progress
Pontotoc

JACKIE HAMPTON
The Mississippi Link
Jackson

JAMIE PATTERSON
The Yazoo Herald
Yazoo City

May 1, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

On behalf of the Mississippi Press Association and our 100 member publishers, I write to express concern about the proposed increase in fees for the Group Registration of Updates to a News Website (GRNW).

Local news organizations are essential to the communities they serve, yet many are under significant financial strain. In the past five years, several communities in Mississippi have lost local coverage due to closures or cutbacks. At the same time, generative AI platforms are using publishers' content without authorization, reducing referral traffic and undermining core revenue streams. For many small publishers, copyright registration is one of the few practical tools available to protect their work.

We commend the Office for establishing the GRNW option and have encouraged our members to use it. However, the proposed 3.5x fee increase would make registration cost-prohibitive for many. As a result, some publishers will stop registering their content, and others will not participate at all.

To support and sustain local journalism, copyright registration must remain accessible. We respectfully urge you to withdraw the proposed fee increase and limit any adjustments to the minimum necessary.

Sincerely,

George R. Turner
President, Mississippi Press Association
Publisher, The Greene County Herald

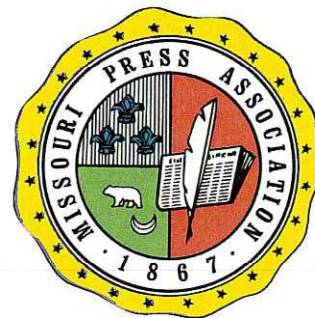
MISSOURI PRESS ASSOCIATION

802 Locust Street / Columbia, Missouri 65201

Phone: 573-449-4167 / Fax: 573-874-5894 / www.mopress.com

April 9, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559



Dear Ms. Chapuis,

I am writing to you on behalf of the Missouri Press Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent 190 publishers across Missouri. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. In the past five years, Missouri has lost 20 publishers, significantly reducing residents' access to high-quality journalism. Our member publishers' revenues have declined significantly in recent years, following over a decade of slow decline of local journalism that has already placed considerable stress on far too many publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and in many cases, shut down entirely.

Our daily papers currently pay around \$90 per month, or \$1,080 annually, for copyrighting. That may not sound like much, but by virtue of operating on shoestring budgets, they simply cannot afford any kind of an increase. Some Missouri papers have stopped entering our annual state newspaper contest, in order to save money on the entry fees. Others have dropped health-care insurance for their employees.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chad Stebbins".

Chad Stebbins
Executive Director
Missouri Press Association

2026 MPA Board of Directors -- President: Bryan Chester, *Columbia Missourian* - **First Vice President:** Bryan E. Jones, *Morgan County Statesman, Versailles* - **Second Vice President:** Mike Scott, *NEMO News Media Group, Kahoka* - **Secretary:** Allen Edmonds, *North Cass Herald, Belton* - **Treasurer:** Hannah Spaar, *The Odessan, Odessa* - **Past President:** Peggy Scott, *Leader Publications, Festus* - **Directors:** Ron Schott, *Wright County Journal, Mountain Grove* - Ken Garner, *Garner Media Holdings, Maryville* - Kimberly Combs, *Paxton Media, Piedmont* - Gary Castor, *Leader Publications, Festus* - Tim Schmidt, *Westplex Media Group, Montgomery City* - Donna Bischoff, *BridgeTower Media, St. Louis* - Jaime Mowers, *Webster-Kirkwood Times, St. Louis*
National Newspaper Association Representative: Dawn Suggs, *The St. Louis American*



Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing on behalf of the Montana Newspaper Association (MNA) regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. The Montana Newspaper Association represents newspapers and digital news publishers across the state of Montana. Our members provide essential journalism to their communities, keeping residents informed, engaged, and connected. From covering local and state government to school events, agricultural issues, and community life, Montana's newspapers play a vital role in strengthening civic engagement, supporting local businesses, and ensuring that local voices are heard.

Despite their importance, many of our member organizations are facing significant economic challenges. Like much of the country, Montana's local news industry has experienced sustained revenue declines over the past decade, driven by the disruption of traditional advertising models and shifts in consumer behavior. These challenges are especially pronounced in Montana, where the state's vast geography and small, dispersed population make community newspapers the primary—and often only—source of reliable local news in many areas.

These economic pressures have forced difficult decisions across the state, including reductions in newsroom staffing, decreased coverage in rural and frontier communities, and increased strain on small, independently owned publications that serve as the backbone of Montana's news ecosystem. In some areas, the risk of "news deserts" is growing as resources shrink and long-standing publications face increasing financial pressure. Even for organizations that remain viable, margins are increasingly tight, limiting their ability to invest in coverage, innovation, and long-term sustainability at a time when access to accurate, locally relevant information is critical.

These challenges are compounded by the rapid rise of generative artificial intelligence (AI). Large AI companies routinely scrape and use our members' original reporting without authorization, often in ways that diminish referral traffic and weaken traditional advertising and subscription-based revenue models. For many local publishers with

limited leverage in negotiating licensing agreements, copyright protection—and the ability to efficiently register that content—is one of the few meaningful tools available to safeguard their work.

We commend the U.S. Copyright Office for developing the GRNW option, which provides an efficient and practical pathway for publishers to register their online content. The Montana Newspaper Association is actively encouraging our members to take advantage of this tool as part of their broader efforts to protect their intellectual property.

However, we are deeply concerned that the proposed 3.5-fold increase in GRNW fees would significantly undermine these efforts. For many local publishers—particularly small and mid-sized organizations, such an increase would make participation financially impractical. As a result, some publishers may be forced to stop registering their content altogether, while others may never begin. This would ultimately weaken the very protections the system is intended to provide.

To protect local journalism and ensure continued access to copyright safeguards, we respectfully urge the Copyright Office to withdraw the proposed GRNW fee increase and limit any adjustments to the minimum necessary. Keeping this process accessible is essential to preserving the viability of local news organizations and the communities they serve.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Allfrey', written over a horizontal line.

Brian Allfrey
Executive Director
Nevada Press Association



Nebraska Press Association

845 "S" St.

Lincoln NE 68508

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Nebraska Press Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent 131 print and digital publishers across Nebraska. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their essential role in the communities they serve, far too many of our members are struggling. Over the past five years, Nebraska has lost 25 publishers due to consolidations, mergers, or closures—many of them in rural areas. At the same time, member publishers have experienced significant revenue declines while facing rising costs across nearly every aspect of their business, including newsprint and postal services. These financial pressures have forced publishers to reduce staff, cut publication days, scale back coverage in underserved areas, merge operations, and in some cases, shut down entirely.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Derossett".

Dennis Derossett
Executive Director | Nebraska Press Association



NEVADA PRESS ASSOCIATION

THE BEST IN JOURNALISM SINCE 1924

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing on behalf of the Nevada Press Association (NPA) regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. The Nevada Press Association represents newspapers and digital news publishers across the state of Nevada. Our members provide essential journalism to their communities, keeping residents informed, engaged, and connected. From covering local and state government to school events, regional development, and community issues, Nevada's newspapers play a vital role in strengthening civic engagement, supporting local businesses, and ensuring that local voices are heard.

Despite their importance, many of our member organizations are facing significant economic challenges. Like much of the country, Nevada's local news industry has experienced sustained revenue declines over the past decade, driven by the disruption of traditional advertising models and shifts in consumer behavior. These challenges are especially pronounced in Nevada, where a large portion of the population is concentrated in Clark County while vast rural regions rely on small, community-based newspapers as their primary source of local information.

These economic pressures have forced difficult decisions across the state, including reductions in newsroom staffing, decreased coverage in rural and underserved communities, and increased strain on smaller, independently owned publications. In some areas, the risk of "news deserts" is growing as resources shrink and sustainability becomes more difficult. Even for organizations that remain viable, margins are increasingly tight, limiting their ability to invest in coverage, innovation, and long-term sustainability at a time when reliable local journalism is more critical than ever.

These challenges are compounded by the rapid rise of generative artificial intelligence (AI). Large AI companies routinely scrape and use our members' original reporting without authorization, often in ways that diminish referral traffic and weaken traditional advertising and subscription-based revenue models. For many local publishers with limited leverage in negotiating licensing agreements, copyright protection—and the

ability to efficiently register that content—is one of the few meaningful tools available to safeguard their work.

We commend the U.S. Copyright Office for developing the GRNW option, which provides an efficient and practical pathway for publishers to register their online content. The Nevada Press Association is actively encouraging our members to take advantage of this tool as part of their broader efforts to protect their intellectual property.

However, we are deeply concerned that the proposed 3.5-fold increase in GRNW fees would significantly undermine these efforts. For many local publishers—particularly small and mid-sized organizations, such an increase would make participation financially impractical. As a result, some publishers may be forced to stop registering their content altogether, while others may never begin. This would ultimately weaken the very protections the system is intended to provide.

To protect local journalism and ensure continued access to copyright safeguards, we respectfully urge the Copyright Office to withdraw the proposed GRNW fee increase and limit any adjustments to the minimum necessary. Keeping this process accessible is essential to preserving the viability of local news organizations and the communities they serve.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Allfrey', written over a horizontal line.

Brian Allfrey
Executive Director
Nevada Press Association

April 30, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the New Jersey Press Association (NJPA) regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. NJPA is a non-profit organization with members comprising of daily newspapers, weekly newspapers, affiliate newspapers, digital newspapers and news organizations, specialty newspapers, and corporate and non-profit associate members with an interest in news media and the news business. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. New Jersey news publishers are not immune from the national challenges felt across the news media industry. Despite strong headwinds, NJPA members are committed to adapting to the new landscape in order to continue serving our communities. In 2025, a number of our state dailies ceased printing and switched to all digital – heightening the importance of strong copyright protections for our work. Other NJPA members have ceased publishing altogether.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

New Jersey legislators have recognized the extremely thin economic margins supporting the state's news publishers, and New Jersey is the first state to launch a Civic Information

Consortium, which invests in local news and information to strengthen communities across the Garden State. As an industry with high price elasticity, every cent matters.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in black ink, appearing to be 'CJ Griffin', written in a cursive style.

CJ Griffin, Esq., General Counsel
NEW JERSEY PRESS ASSOCIATION
Tel: 201-488-8200
Email: cgriffin@pashmanstein.com



New York News Publishers Association, Inc.

252 Hudson Ave, Albany, New York 12210 – Phone/Fax (518) 449-1667 – www.nynpa.com

April 15, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the New York News Publishers Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent 60 publishers of print and digital, for-profit and not-for-profit newspapers of all sizes across New York State. Some of our member newspapers have been in the same family for five generations, while others are in their second or third year of publication. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. In recent years, New York has lost approximately 40 percent of its newspapers, primarily weekly publications covering small towns and rural communities. Many others, often in areas not served by other media, are struggling as a result of the migration of advertising to digital formats, which are cheap because the platforms on which they appear do not pay staff to generate the content that attracts viewers.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place.

Albany—*Times Union*
Auburn—*The Citizen*
Batavia—*The Daily News*
Brooklyn—*Brooklyn Daily Eagle*
Binghamton—*Press & Sun-Bulletin*
Buffalo—*The Buffalo News*
Canandaigua—*The Daily Messenger*
Cold Spring—*Highlands Current*
Dunkirk—*The Observer*
Elmira—*Star-Gazette*
Geneva—*Finger Lakes Times*
Glens Falls—*The Post-Star*
Herkimer—*The Times Telegram*
Hornell—*The Evening Tribune*
Ithaca—*The Ithaca Journal*
Jamestown—*The Post-Journal*
Kingston—*Daily Freeman*
Lockport—*Union-Sun & Journal*
Long Island—*Newsday*
Malone—*The Malone Telegram*
Massena—*Courier-Observer/The Advance News*
Mendon—*Mendon-Honeye Falls-Lima Sentinel*
Middletown—*The Times Herald-Record*
New York City—*The New York Post*
New York City—*The New York Times*
New York City—*The Wall Street Journal*
Niagara Falls—*Niagara Gazette*
Norwich—*The Evening Sun*
Olean—*The Times Herald*
Oneida—*Oneida Daily Dispatch*
Oswego—*The Palladium Times*
Plattsburgh—*Press-Republican*
Poughkeepsie—*Poughkeepsie Journal*
Ravena—*Ravena News-Herald*
Red Hook—*The Daily Catch*
Rochester—*Democrat and Chronicle*
Rochester—*The Daily Record*
Rochester—*Rochester Business Journal*
Salamanca—*Salamanca Press*
Saranac Lake—*Adirondack Daily Enterprise*
Saratoga Springs—*The Saratogian*
Staten Island—*Staten Island Advance*
Syracuse—*The Post-Standard*
Troy—*The Record*
Utica—*Observer-Dispatch*
Watertown—*Watertown Daily Times*
Wellsville—*Wellsville Daily Reporter*
White Plains—*The Journal News*

The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in black ink that reads "Diane Kennedy". The signature is written in a cursive style with a loop at the end of the last name.

Diane Kennedy
President



North Carolina Press Association
Fighting for [your right to know](#) since 1873

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the North Carolina Press Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent over 180 publishers across North Carolina. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. Our member publishers' revenues have declined drastically in recent years, following over a decade of slow decline of local journalism that has already placed considerable stress on far too many publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and in many cases, shut down entirely.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Phil Lucey
Executive Director
North Carolina Press Association



April 21, 2026
Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Pennsylvania NewsMedia Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent more than 200 publishers across Pennsylvania. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. In the past five years, our member publishers' revenues have declined significantly in recent years, following over a decade of slow decline of local journalism that has already placed considerable stress on far too many publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and do more with less which translates to decreased transparency and citizens' ability to hold government officials accountable. This situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

William M. Cotter
President
Pennsylvania NewsMedia Association



106 OUTLET POINTE BLVD.
COLUMBIA, SC 29210
(803) 750-9561
SCPRESS.ORG

2026 - 2027 OFFICERS

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FAIRFIELD COUNTY*

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LEISA RICHARDSON
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CRIS TEMPLES
CHARLESTON CITY PAPER

CO-EXECUTIVE DIRECTORS

JEN MADDEN
RANDALL L. SAVELY

April 27, 2026

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

We are writing to you on behalf of the South Carolina Press Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent more than 100 publishers across South Carolina. Our members provide essential journalism to their communities, keeping them informed and engaged. By covering everything from local and state politics to school events, regional developments and sports, our members play a vital role in supporting local businesses, keeping communities connected and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. Our member publishers' revenues have declined significantly in recent years, following more than a decade of considerable stress on far too many news publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and in some cases, shut down entirely.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key. We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in South Carolina and across the nation, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Jen Madden and Randall Savely
Co-Executive Directors



TEXAS PRESS ASSOCIATION

ESTABLISHED 1880 / 8800 BUSINESS PARK DR STE 100, AUSTIN, TX 78759 / 512-477-6755 / TEXASPRESS.COM

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

The Texas Press Association is deeply concerned about the proposed fee for the Group Registration of Updates to a News Website (GRNW). The proposed fee - three and a half times the existing rate - would deliver a devastating blow to newspapers as they struggle for survival in a rapidly evolving news industry climate.

The overwhelming majority of the 360 Texas newspapers we represent are small businesses. Many, in fact, are prototypical “mom-and-pop” family-owned publications. But whether it’s a metropolitan daily or a rural hometown weekly, a newspaper provides essential news and information to its fellow citizens, and therefore is a key component of a community’s civic and social identity. Newspapers pay salaries to professional journalists who serve as the chroniclers and the watchdogs of local, regional and state governments. Additionally, they cover everything from high school football to local business news, weddings, obituaries, school graduations and the county fair. They quite often are the only original source of reliable, third-party, professional coverage of important local matters. They further connect their communities by making their commentary space available, providing their citizens voice and agency in local affairs.

Today’s newspaper staffs do this important work both in print and online. In fact, the digital dissemination of a newspaper’s content is increasingly vital to its economic survival. Digital is now and will remain a key to easy access by Texans. However, that same easy access is also posing a serious existential threat to newspapers.

At the same time Internet access has connected newspapers with readers, it has provided a digital freeway onramp for unscrupulous generative artificial intelligence developers who “scrape” news sites without permission or payment. Ignoring the intent of copyright laws, such operators present newspapers’ hard-earned intellectual property in crafty ways that reduce referral traffic to the newspapers’ original stories, photographs and graphic illustrations. Needless to say, this is harmful to newspapers’ advertising and subscription-based monetization strategies.

Since many local newspapers have limited leverage when it comes to negotiating licensing deals, copyright registration is key to protecting their content. We appreciate and commend the Office for its work in setting up the GRNW option, which helps publishers easily register their online content. We are informing our members of this opportunity, and we are urging them to take advantage of it. We are concerned, however, that the proposed higher fee schedule would severely hinder this progress. A three and a half-fold fee increase for GRNW would make the option economically unfeasible for many of our publishers. Some would likely stop registering, and others will likely never start.

Despite their integral role in the communities they serve, far too many of our members are struggling. TPA President Lisa Chappell laid out the economic realities for Texas newspapers in an April 2026 recent post:

“The hammers keep falling from every direction. Fuel costs, office supplies, plates and newsprint – which is about to go up once again, unfortunately. This is forcing us to look at reducing our print

quantities, page counts, how much color we can print. These are difficult decisions and conversations, since we know reducing page counts means complaints from our subscribers that our papers just keep shrinking while the cost does not.

“For small mom & pop newspapers, the rising expenses likely mean a sharp reduction in your own paycheck. This is our reality. Every added dollar must be absorbed somewhere, and for many there truly is very little left to trim.

“The other side to the equation is our revenue is slipping away like quicksand below us. We rely on local advertising to pay our bills, but our local businesses are feeling the pinch just like we are. When times get tough advertising and marketing are typically the first line items to be reduced or cut all together. Our business neighbors are simply trying to survive just like we are.”

To protect local journalism in America, we must keep copyright registration affordable and must make it easily accessible to all publishers. We join our colleagues across the nation in in asking you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,



Micheal Hodges, TPA Executive Director



Donnis Baggett, TPA Executive Vice President



Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing on behalf of the Utah Press Association (UPA) regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. The Utah Press Association represents newspapers and digital news publishers across the state of Utah. Our members provide essential journalism to their communities, keeping residents informed, engaged, and connected. From covering local and state government to school events, business developments, and high school sports, Utah's newspapers play a vital role in strengthening communities and supporting local economies.

Despite their importance, many of our member organizations are facing significant economic challenges. Like much of the country, Utah's local news industry has experienced sustained revenue declines over the past decade, driven by the disruption of traditional advertising models and shifts in consumer behavior. These challenges are uniquely shaped by Utah's rapid population growth and geographic dynamics, where a significant portion of residents live along the Wasatch Front while many rural communities rely on small, community-based newspapers as their primary source of local information.

These economic pressures have forced difficult decisions across the state, including reductions in newsroom staffing, decreased coverage in rural and underserved areas, and increased strain on independently owned publications that serve as the backbone of local journalism in Utah. In fast-growing areas, newsrooms are often stretched thin trying to keep pace with expansion, while in rural communities, limited resources heighten the risk of reduced coverage and emerging "news deserts." Even for organizations that remain viable, margins are increasingly tight, limiting their ability to invest in coverage, innovation, and long-term sustainability at a time when reliable local journalism is more critical than ever.

These challenges are compounded by the rapid rise of generative artificial intelligence (AI). Large AI companies routinely scrape and use our members' original reporting without

authorization, often in ways that diminish referral traffic and weaken traditional advertising and subscription revenue models. For local publishers with limited leverage, copyright protection—and the ability to efficiently register that content—is one of the few meaningful tools available to safeguard their work.

We commend the U.S. Copyright Office for developing the GRNW option, which provides an efficient and practical pathway for publishers to register their online content. The Utah Press Association is actively encouraging our members to utilize this tool as part of their content protection strategy.

However, we are deeply concerned that the proposed 3.5-fold increase in GRNW fees would significantly undermine these efforts. For many local publishers—particularly small and mid-sized operations—such an increase would make participation financially impractical. As a result, some publishers may be forced to stop registering their content altogether, while others may never begin. This would ultimately weaken the very protections the system is designed to provide.

To protect local journalism and ensure continued access to copyright safeguards, we respectfully urge the Copyright Office to withdraw the proposed GRNW fee increase and limit any adjustments to the minimum necessary. Keeping this process accessible is essential to preserving the viability of local news organizations and the communities they serve.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Allfrey', written over a horizontal line.

Brian Allfrey
Executive Director
Utah Press Association



Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Washington Newspaper Publishers Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent over 70 publishers across Washington State. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, keeping communities connected, and ensuring that local voices are heard and empowered.

Despite their integral role in the communities they serve, far too many of our members are struggling. In the past five years, Washington has two counties with no local news outlet at all and ten more with only one or two, significantly reducing residents' access to high-quality journalism. Our member publishers' revenues have declined significantly in recent years, following over a decade of slow decline of local journalism that has already placed considerable stress on far too many publishers. Declining revenues have forced publishers to cut staff, reduce coverage in underserved areas, and in many cases, shut down entirely.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and in order to protect their content, copyright registration is key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers' ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

A handwritten signature in black ink that reads "Ellen Hiatt". The signature is written in a cursive, flowing style.

Ellen Hiatt
WNPA Executive Director



WISCONSIN NEWSPAPER ASSOCIATION

Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, DC 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Wisconsin Newspaper Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent over 180 publications across Wisconsin. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained.

Despite the integral role in the communities they serve, far too many of our members are struggling. Like the rest of the U.S., Wisconsin newspapers are losing their main income streams. Print advertising has largely disappeared due to competing platforms; circulation revenue is declining as readers shift online and digital ads exist but generate far less revenue than print once did.

Cumulatively, this has created a long-term “revenue gap” that most local papers have not fully replaced. Consequently, many local newspapers have limited leverage when it comes to negotiating licensing deals. To protect their content, copyright registration remains key.

We strongly commend the Office for promulgating the GRNW option and enabling publishers to easily register their online content. We are actively working with and encouraging our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress and limit publishers’ ability to register their content in the first place. The proposed 3.5-fold fee increase for GRNW would simply make the option economically unfeasible for most of our publishers, and we expect some to stop registering, while others will never start.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Beth Bennett
Executive Director



Emily Chapuis
General Counsel
U.S. Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559

Dear Ms. Chapuis,

I am writing to you on behalf of the Wyoming Press Association regarding the proposed fee increase for the Group Registration of Updates to a News Website (GRNW) application. We represent 39 legal newspapers and their publishers across Wyoming. Our members provide essential journalism to their communities, keeping them informed, engaged, and entertained. By covering everything from local and state politics to school events, regional developments, and sports, our members play a vital role in supporting local businesses, connecting communities, and empowering local voices.

Despite their integral role in Wyoming, far too many of our members are struggling with declining revenues and nearly impossible decisions each day on how to deploy their limited reporting resources to provide relevant journalism in their communities. The stress is real every day.

The situation is made worse by the rise of generative artificial intelligence (AI). Large AI companies routinely scrape our members' intellectual property without authorization and use it in a manner that reduces their referral traffic, threatening advertising and subscription-based monetization strategies. Many local newspapers have limited leverage when it comes to negotiating licensing deals, and to protect their content, copyright registration is key.

We strongly commend the Office for announcing the GRNW option and enabling publishers to easily register their online content. We will encourage our members to take advantage of this new opportunity and register their content.

We are concerned, however, that the proposed fee schedule would severely hinder this progress. The proposed 3.5-fold fee GRNW increase would simply make the option economically unfeasible for many of our publishers.

To protect local journalism in America, we must keep copyright registration accessible to all publishers, and we therefore join others in calling for you to withdraw the proposed GRNW fee increase and limit any adjustments to the bare minimum.

Sincerely,

Steve Kiggins
Executive Director
Wyoming Press Association
steve@wyopress.org
(O): 307-635-3905
(C): 307-287-6019