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THE INDIAN
IMI
MUSIC INDUSTRY
Formerly IPI Estd. 1936

To,

Ms. Vandana Sethi,

Advisor Admin & IR,

TRAI

Subject: The Indian Music Industry's counter comment to Meta's representation to TRAI's Consultation Paper on Digital Transformation through 5G Ecosystem ('Consultation Paper')

Respected Ma'am,

The Indian Music Industry (IMI) is the apex body that represents the business and trade interests of the recorded music industry in India. IMI is registered under the West Bengal Societies Registration Act, 1961. We are writing this representation with reference to the counter comments invited on responses to the Consultation Paper.

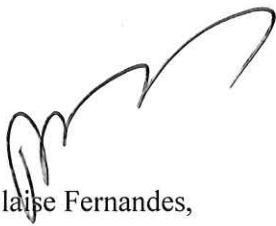
Meta through its representation called for interoperability of systems on the Metaverse and amongst its platforms to further boost the Virtual Reality market from a technology development aspect. Interoperability of systems on the Metaverse could raise the potential concern of online piracy considering the nature of interoperability being such that it enables users to access and share content across multiple services in the connected metaverse.

In an interoperable environment, different platforms may have varying levels of copyright enforcement measures and policies. This lack of standardized practices can lead to inconsistencies in addressing online music piracy, creating loopholes that pirates can exploit in order to evade liability. Interoperability can also complicate licensing agreements and royalties

receivable by music rightsholders from music streaming services. Different platforms may have distinct licensing terms and revenue-sharing models, leading to disputes and uncertainties in compensating artists and rights holders. Specifically on user generated platforms and platforms enabled on the Metaverse itself, - cross-sharing of copyrighted material by users can lead to potential copyright concerns. In light of interoperability, the authorised music available on music library of Metaverse platforms could be disseminated along with users of other platforms that lack music license. Such issues could deprive rightsholders in the Indian music industry from getting their due revenues that in turn employees nearly 14 million people in the informal music sector.¹

IMI hence implores TRAI to keep in mind the dangers posed by the interoperability of online platforms- especially ones hosting user generated content. The enabling of an interoperable system in a landscape such as virtual reality would cripple the recorded music industry in light of the blatant piracy.

Regards,



Blaise Fernandes,

CEO and President,

The Indian Music Industry (IMI)

¹ <https://indianmi.org/wp-content/uploads/2022/09/The-Untold-Potential-of-India-s-Informal-Music-Industry-1.pdf>