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Antitrust Division  
U.S. Department of Justice  
950 Pennsylvania Ave. NW  
Washington, DC 20530

VIA EMAIL: [ATR.MEP.Information@usdoj.gov](mailto:ATR.MEP.Information@usdoj.gov)

International Association of Venue Managers (IAVM) currently represents 6,744 venue professional members that manage public venues including Arenas, Amphitheaters, Convention Centers, Fair Grounds, Performing Arts Theaters, Universities, and Stadiums. On behalf of these venue professionals we strongly encourage the DOJ to maintain the current consent decrees for BMI and ASCAP. The consent decrees serve a vital role in maintaining equitable licensing for all venue types and sizes and protect licensees against anticompetitive behavior of the two licensing giants; ASCAP and BMI.

Many of the IAVM member venues have received letters this week which insist that a new license agreement is signed; this new agreement more than triples rates. In addition, we've been told they will begin to seek a portion of new revenue sources the venues generate that are currently not a part of the past license agreements. The letter closes with a veiled threat to cancel the venue's license should the new agreement not be signed and returned. Abolishment of these decrees will only allow monopolistic entities to become more powerful which will certainly result in complete unbalance in the music licensing world.

On behalf of our member professionals and the venues they manage, IAVM requests that DOJ maintain the current decrees as the removal of the decrees, without an alternative solution, will create an untenable situation for licensees, venues and the Americans who work in these public venues. Our venues collectively host millions of guests in our member venues, and should licensing fees increase exponentially by altering the consent decrees, those guests will experience the increase. In addition, many of the venues serve the communities in which they reside and change of these decrees will negatively affect the community outreach, engagement, and education efforts the venues provide to the communities they serve.

Respectfully,

Brad Mayne, CVE  
Chief Executive Officer