



September 26, 2025

The Honorable John Squires
Under Secretary of Commerce for Intellectual Property and
Director of the U.S. Patent and Trademark Office
United States Patent and Trademark Office
600 Dulany St.
Alexandria, VA 22314

Dear Director Squires,

On behalf of the American creative sector, the Digital Creators Coalition (DCC) congratulates you on your confirmation as the Director of the U.S. Patent & Trademark Office (PTO). Your Office is vital to the U.S. government's work of championing American global dominance in creativity. As President Trump proclaimed on World IP Day, "The future of our great Nation depends on the continued safeguarding of our intellectual property, which fuels economic growth, technological progress, and global competitiveness." The critical role of PTO supports millions of American creators and their contributions to U.S. jobs, wages, economic growth and national economic security.

DCC member organizations represent American creators, independent producers, small-and-medium-size enterprises, large businesses, and workers from across the copyright-intensive creative sectors, including movies, music, television, illustrators, photographers, authors, and publishers, as well as news, magazine and digital media. We are committed to advancing the interests of the creative community in the digital environment and are united in our resolve that strong copyright protection for American creators should continue to be a top priority for the United States and its international engagement.

The economic contributions of America's creators are unparalleled – leading by virtually every metric, from high-quality, well-paying American jobs to GDP, exports, trade surplus and beyond. The creative sector contributes significantly to U.S. economic growth, employment, exports, and the digital economy. According to the most recent study, the copyright industries added more than \$3.3 trillion to the GDP, accounting for over 12 percent of the U.S. economy.

In terms of the U.S. digital economy, the total copyright industries accounted for more than 63 percent of the U.S. digital economy, contributing over 56.6 percent to the U.S. digital economy employment. The copyright industries employ nearly 21 million workers, who generally earn 50 percent more than the average U.S. annual wage. The copyright industries collectively contribute over \$272 billion to U.S. export earnings.

Promoting American Creators, Defending Copyright and Rejecting Exceptions for AI

PTO's leadership is essential in opposing efforts to diminish copyright protection both at home and abroad. This is particularly true as governments around the world are adopting or considering the adoption of broad exceptions to copyright for the text and data mining (TDM) of American creative content to train artificial intelligence (AI) models. Such exceptions amount to state-sanctioned theft of American creativity for use by AI companies. The DCC strongly opposes TDM exceptions for training AI systems.

Copyright is a property right enshrined in the U.S. Constitution. A government's expropriation of an individual's property to subsidize highly-capitalized AI companies is a private wealth transfer that will harm markets and stifle development necessary to produce new original content. Copyright exceptions for TDM are regulatory intervention that are antithetical to the sanctity of private property rights and the freedom of contract.

Winning the AI race is not a zero-sum game that requires sacrificing U.S. creative superiority to achieve AI dominance globally. Protecting national security does not require AI training on creative content without a license for commercial purposes. While some inputs may be essential to address America's national security imperative for AI, creative content is not. It is critical that foreign countries be stopped from adopting TDM exceptions. These promote offshoring of U.S. AI investment and catalyze foreign AI companies' theft of American copyright.

And the Trump Administration has been clear, not only regarding the vital importance of American creators and innovators to U.S. national economic security, but also about the need to safeguard IP in the context of AI. For example, in the *Statement on AI for Prosperity* (June, 2025), President Trump along with the other G7 leaders confirmed "the need to respect intellectual property rights in enabling these efforts" to accelerate AI readiness and competitiveness. Likewise, the Trump Administration has adopted no policies suggesting the diminution of America's unwavering support for IP, neither in the Special 301 Report nor in the AI Action Plan.

The first Trump Administration was no different and fought hard to stop the wholesale theft of American IP. In the 2018 Section 301 investigation into China, for instance, the Administration found that such theft was occurring on a large scale to the detriment of American manufacturing, services and innovation. In 2020, the Administration issued *Artificial Intelligence for the American People*, which reaffirmed the President's commitment to protecting IP in the AI environment.

Prioritizing PTO's Leadership

PTO's leadership in fueling IP-intensive economic growth and promoting the global dominance of the American creative sector relies heavily on the intellectual capital, hard work, dedication,

creativity and effectiveness of the Office of Policy and International Affairs (OPIA), which the DCC strongly supports. OPIA is exemplary in the U.S. Government or any government in terms of the depth and breadth of their knowledge of IP, including with respect to their mastery of U.S., foreign and international treaty law. The Office plays an essential part in delivering on the President's commitment to IP protection and is instrumental in implementing the Administration's IP policies. This includes their leadership at the World Intellectual Property Organization and their expert counsel regarding the IP equities involved in numerous ongoing U.S. international negotiations as well as critical policy deliberations within the U.S. Government.

The DCC also strongly supports the PTO IP Attaché program. The program, and all of the individuals that are a part of it, have consistently and impeccably delivered on its mission to promote strong IP protection and enforcement globally, including copyright. The IP Attachés and Specialists have proven exceptional in their ability to advance critical U.S. copyright priorities with foreign governments, to provide training to officials of those governments, to raise public awareness around the importance of promoting creativity, to convey the position of the U.S. government regarding the need to protect copyright, and to deliver critical services directly to creators and other stakeholders. The DCC continues to support the appropriate rank of Counselor for the IP Attachés in the U.S. Embassies, Missions and Consulates at which they are posted and also welcomes the continued consideration of initiatives to further strengthen the program to ensure that IP Attachés and Specialists are located in as many critical markets as possible and that the program has the most extensive global coverage that could be available.

Conclusion

The DCC looks forward to working with you to build strong copyright protection systems around the world and to maintain our country's status as a world leader in promoting creativity and protecting copyright overseas. We request the opportunity to meet with you to discuss our goals and to work with you, OPIA and the IP Attachés and Specialists in partnership to promote strong U.S. policy and international engagement to promote American creativity and protect copyright.

Sincerely,

Alliance for Recorded Music
American Association of Independent Music
American Federation of Musicians
American Society for Collective Rights Licensing
American Society of Composers, Authors and Publishers
American Society of Media Photographers
Artist Management Association
Artist Rights Alliance
Artist Rights Institute
Association of American Publishers
Association of Independent Music Publishers
Association of Writers & Writing Programs
The Authors Guild
Black Music Action Coalition
Choreographers Guild

CreativeFuture
Concept Art Association
Copyright Alliance
Department for Professional Employees, AFL-CIO
Directors Guild of America
Fan Alliance
Folk Alliance International
Future of Music Coalition
Georgia Music Partners
Independent Film & Television Alliance
International Alliance of Theatrical Stage Employees
International AntiCounterfeiting Coalition
Music Artists Coalition
Music Managers Forum - US
National Association of Voice Actors
National Music Council
News/Media Alliance
Production Music Association
Recording Academy
Recording Industry Association of America
Screen Actors Guild-American Federation of Television and Radio Artists
SESAC Music Group
The Society of Composers & Lyricists
Songwriters Guild of America
SoundExchange