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For the essay

AI Authorship, a Futile Pursuit? A Look Through the Lens of Music Generating AI

AI AUTHORSHIP, A FUTILE PURSUIT? A LOOK THROUGH THE LENS OF MUSIC GENERATING AI

Aditya Subarno

I. Introduction

The idea of a dystopian future where artificial intelligence has not only taken over simple, routine tasks but also encroaches on human creativity is not just an idea: it is a reality. We live in an age where not only are AI systems creating instrumental music in minutes, but these "works" are being commercially exploited through a system of licensing and royalties.Therefore it is the need of the hour to have a clear understanding of the notions of authorship and copyright protection vis-a-vis AI generated works, and the practical implementations of it in today's scenario.

Most legal analysis on this issue has centred around who should be granted Authorship in works created by an AI system within the Copyright framework and has identified the key stakeholders. However, such analysis skips a step and doesn't address the fundamental question of why copyright should be assigned to such works in the first place.

The first part of the essay covers the basics of the technology behind the AI systems and how the works are generated, while also differentiating between generative AI software and AI assistive tools. The second examines the potential Copyright issues with such works and the stakeholders involved. The third examines the current status of AI generated works in different jurisdictions. The fourth argues for not providing any protection for works generated by AI and instead a paradigm wherein all such works devolve invariably to the public domain. The fifth and final part concludes the essay.

2. How The Technology Works

The 'earliest known recording of music produced by a computer' goes back to 1951.[1] Since then, technology has progressed exponentially with popular musicians using artificial intelligence or AI tools in the creation of their albums, and even entire songs being generated by AI without musicians.[2] In 2016, for example, researchers utilised software called *Flow Machines* to generate the composition of a Beatles-inspired song, which was then arranged and produced as a pop song named *Daddy's Car* by a human composer, Benoît Carré.[3]

At this juncture, it is important to differentiate between AI assisted tools and AI software in music generation. Broadly, AI technology in making music can be categorised on the basis of the degree of human input necessary to make music. The first kind can be thought of as an assistive tool using which a musician can get compositional suggestions. This form of assistive technology is comparable to the autocorrect and suggestions given by writing software programmes like *MS Word*. In such cases, human interaction is the most important factor since the AI merely serves as an aid to make the final work.

[1] BBC, *Listening to the music of Turing's computer*, available at https://www.bbc.com/news/magazine-37507707

[2] Time, *'There's a Wide-Open Horizon of Possibility.' Musicians Are Using AI to Create Otherwise Impossible New Songs*, available at https://time.com/5774723/ai-music/

[3] Flow Machines, *Daddy's Car, A Song Composed by Artificial Intelligence Created to Sound Like The Beatles*, available at https://www.flow-machines.com/history/press/daddys-car-song-composed-artificial-intelligence-created-sound-like-beatles/

For an everyday musician, AI-assistive technology is already incorporated into popular music-making applications known as Digital Audio Workstations (or DAWs).[4] Just as Microsoft is not the author of literary works written using *MS Word* with help of grammar correction, the person using such AI tools to make music tends to be considered the author of the music and not the person who owns the software. This is consistent with Section 2(d)(vi) of the Indian Copyright Act, 1957, which grants authorship of a computer-generated work to the person who 'causes it to be created'.[5]

The second kind of AI fits more into the typical idea of AI: even a layman can enter commands and the software outputs music thus allowing both musicians and non-musicians to make music by indicating parameters like genre, mood and tempo.

Most of such music-generating AI software programmes use 'neural networks' which are intended to mimic the functioning of the human mind. Essentially, they use a data set, which may comprise thousands of songs, and is fed into a software programme which, via feedback loops, over time, learns how to make music using the data set.[6]

In other words, one can input a large amount of source material, ranging from jazz singles to classical pieces, which are analysed for patterns.[7] Chords, pace, duration, and how notes connect to one another are analysed by the AI programme to learn how to form comparable patterns which may also, depending on how the software is coded, adhere to music theory principles. Thus, AI programmes predict how musical elements should or could be redistributed, possibly taking user requirements into account, and aid in the composition of music if not generate the music themselves.[8]

It is important to note here that often such technologies are purported to one day replace musicians, and are as good, if not better at creating music than humans. Such claims are usually provided by journalistic blogs (understandably, to have a catchy headline), and couldn't be further from the truth. At best, the current AI technologies are extremely good at analysing pre-existing pieces of work, recognising patterns and

[4] Available at: https://www.ableton.com/en/blog/magenta-studio-free-ai-tools-ableton-live/
[5] Section 2(d)(vi) of the Copyright Act, 1957
[6] OpenAI, *Jukebox*, available at https://openai.com/blog/jukebox/
Also see: https://arxiv.org/pdf/2005.00341.pdf/
[7] Jessica L. Gillotte, *Copyright Infringement in AI-Generated Artworks*, 53 U.C. Davis L. Rev. 2655 (2020).
The Verge, *How Ai-Generated Music Is Changing The Way Hits Are Made*, available at https://www.theverge.com/2018/8/31/17777008/artificial-intelligence-taryn-southern-amper-music
[8] Eric Sunray, *Sounds of Science: Copyright Infringement in AI Music Generator Outputs*, 29 Cath. U. J. L. & Tech 185 (2021).

then subsequently generating something it believes is similar to the pre-existing works. While very impressive, one almost forgets that it is merely doing a fantastic job at imitating. This imitation is then packaged and sold as "original" music.

AIVA, "Artificial Intelligence Virtual Artist", is a music generative AI software developed by Aiva technologies is one such software. Its data set and subsequent training consisted of 30,000 classical music scores.[9] Upon inputting a few parameters, the software outputs a piece of music, which can further be augmented by the user providing an "influence song" to help the software understand what the user wants.[10] This software is currently primarily used as a commercial venture to provide "emotional soundtrack music" on a licensing basis.[11] Aimed towards people looking for background music, it claims to provide an easier alternative to hiring a musician or stock music in a few minutes according to the parameters selected by the user. It also interestingly blurs the lines between the aforementioned AI assistive tools and AI generating software by allowing the user to further tweak the generated piece of music as they see fit. They offer the service, and the subsequent generated works, under three licence plans. The free plan allows the works to be used for non-commercial purposes, with "AIVA" owning the copyright to the works (It is a little unclear as to who the company is referring to, as both the software and the company have the same name). The users also have to provide credit as- *"Soundtrack composed by AIVA (Artificial Intelligence Virtual Artist): https://www.aiva.ai".*[12] The Standard plan allows for commercial use on a specific few platforms: *YouTube, Twitch, Tik-Tok* and *Instagram.* It forgoes the need to provide credit, but continues to contain the clause of copyright ownership vesting with "AIVA". The Pro Plan allows the user to possess copyright ownership over the works generated by AIVA and to be exploited commercially.

In the case of such AI which generates music with minimal human interaction, the question of copyright becomes less straightforward. Looking at Section 2(d) of the Indian Copyright Act, 1957, for example, it is extremely difficult to identify the person who causes it to be made as there are multiple options of who should be recognised as

[9] European Union Cordis Search, *AI composers create music for video games*, available at https://cordis.europa.eu/article/id/421438-ai-composers-create-music-for-video-games
[10] Available at: https://www.nvidia.com/en-us/research/ai-art-gallery/artists/aiva/
[11] Available at:https://aiva.ai/
[12]Available at: https://aiva.crisp.help/en/article/i-dont-understand-the-terms-of-license-1wqvh5v/

the author: the programmer of the software, the programmer's employer, the user of the software, or the software itself. Such questions are examined in the next section.

3. Potential Issues

A whole host of issues arise when trying to fit AI generated works under the copyright framework. Issues of ownership of the works, whether such works are 'original', if creativity was a factor in the making of such works and moral rights vis-a-vis suich works are some of the primary questions that arise. Issues of incompatibility with the term of protection due to the non ageing nature of AI and the use of copyrighted material to train AI also arise.

Several other questions and issues not directly linked to the works also arise. The question of who will bear the liability of any infringement arising from such works, and who would enjoy the benefits accruing from the works.

Due to the word limit, the author would not be able to examine all such issues in depth. An attempt, however, will be made to examine a few key questions in the following section.

Originality and Creativity

Copyright cannot subsist in musical works which are not original.[13] While originality has not been explicitly defined in the Indian copyright statute, the judicial standard over time has shifted from using the 'sweat of the brow',[14] to including a minimal level of creativity, and the employment of skill, judgement and effort as laid out in cases like *Eastern Book Company v. DB Modak*.[15]

In the United States a minimal level of creativity is necessary for a work to be considered original, with the Author having made the work having a selection or arrangement independently.[16] The EU also follows a creativity based approach with

[13] Section 13(1)(a) of the Indian Copyright Act, 1957.
[14] Krishna Hariani, Anirudh Hariani, *Analyzing "Originality" In Copyright Law: Transcending Jurisdictional Disparity*, 51 IDEA 491 (2011).
[15] Eastern Book Company v. D B Modak, (2008) 1 SCC 1.
[16] Patrick Zurth, *Artificial Creativity? A Case Against Copyright Protection For Ai-Generated Works*, 25 UCLA Journal of Law & Technology 2 (2021).

the originality standard being met "if the author was able to express his creative abilities in the production of the work by making free and creative choices".[17]

Despite having a nexus with originality in most countries[18], there exists no clear definition for creativity. Since one part of this essay deals with musical works, the author would like to use a Bob Dylan quote to shed some light on the elusive meaning of creativity: *"Creativity has much to do with experience, observation and imagination, and if any one of those key elements is missing, it doesn't work".*[19]

This leads to a core question: do AI software programmes create the music or simply generate it?

Creation implies a certain level of creativity, to draw from case law, while generation does not necessarily imply the involvement of creativity, and could be restricted to mere 'production'.

When AI-assistive technology is used, it could easily be argued that the musical output is original on account of the high degree of human engagement involved in the making of the relevant music. After all, it is the user's musical skill and sensibilities which cause the music to come into being.

However, the situation changes dramatically where AI is used to generate music with minimal human input, and with the software doing all the heavy lifting, so to speak. In such cases, the audio output that is produced could be considered to be a mosaic of sound recording pieces that have been modified to resemble something seemingly new. As a result, labelling the AI generator's output as a creation may be inaccurate. At the end of the day, it is a mathematical model which after ingesting huge amounts of data in the form of music, outputs something based on what the user wants.[20]

Training Data

Unless all the works in the data set used by AI to make music belong to the public domain, concerns about copyright infringement may arise in relation to both input

[17] Case C-145/10, Painer v. Standard VerlagsGmbH, 2011 E.C.R. I-12594; see also Case C-604/10, Football Dataco Ltd. v. Yahoo! UK Ltd., ECLI:EU:C:2012:115, (Mar. 1, 2012).

[18] *Supra* note 17.
[19] Bob Dylan, Chronicles:Volume One, (2004).
[20] IBM, *The quest for AI creativity*, available at https://www.ibm.com/watson/advantage-reports/future-of-artificial-intelligence/ai-creativity.html

and output. While the Indian Copyright Act, 1957, does not specify whether the use of protected works to train AI constitutes infringement, a case for infringement can be argued in relation to the storing and adapting of works to train AI if an appropriate licence is not procured for the same.

An adaptation is defined by the Indian Copyright Act, 1957, to include any arrangement of a musical work or the re-arrangement of any work,[21] and although the statute does not define derivations, the adaptation right is one of the exclusive rights which copyright owners of certain works including musical works enjoy. Due to this, at the stage of making music too, copyright issues could arise since the musical output could be considered to be derived from the input.

Music copyrights are, of course, composite rights which could easily include distinct rights in music, lyrics, and performances. To determine which rights are at play in any given case, the components of the musical input and output must both be examined along with the relevant software.

While each AI software programme works differently, although it is not easy to do so, the underlying code must be analysed in depth to determine if any sort of re-arrangement of the musical elements inputted into the software has taken place, to reverse engineer a neutral network,[22] or to identify the input by analysing the output. In recent times, such an analysis is extremely hard to do due to the black box nature of AI softwares.[23]

In case of the training data constituting works which are under copyright protection, clearance in the form of licensing or permission is necessary.[24] This is because AI software in the process of generating works creates copies of its training data,[25] which may constitute creating infringing copies under Section 2(m) of the Copyright Act.

Furthermore, the issue of the generated work being similar to the works in the corpus also remains unanswered. One of the leaders in AI technologies, "OpenAI", in its submission before the United States Patent and Trademark Office Department of

[21] Section 2(a) of the Indian Copyright Act, 1957.
[22] The Verge, *We've Been Warned About AI and Music For Over 50 Years, But No One's Prepared,* available at https://www.theverge.com/2019/4/17/18299563/ai-algorithm-music-law-copyright-human
[23] Rita Matulionyte, Jyh-An Lee, *Copyright in AI-generated works: Lessons from recent developments in patent law*, 19:1 SCRIPTed 5 (2022).
[24] Mauritz Kop, *AI & Intellectual Property: Towards an Articulated Public Domain University of Texas School of Law*, 28 Texas Intellectual Property Law Journal 1 (2020).
[25] *Supra* note 8.

Commerce defending fair use for the training corpus, stated that "an AI system can eventually generate media that shares some commonalities with works in the corpus".[26]

The defence of fair use is often cited in the US context when discussing infringement vis-a-vis the training corpus, with *Authors Guild v. Google, Inc* being the flagbearer of fair use.[27] The defence of fair use in the context of AI generated music, however, is flawed. Unlike the Google case, where the issue was related to Google scanning and implementing a search function for copyrighted text, a music generating software is more than just a search function. The two work on different models of machine learning. The google example is one of a discriminative model,[28] where data is merely collated and is broken to a single result. Music generating AI on the other hand work on a generative model,[29] where new data is made from old data. Thus in such a case, if a music generating AI is trained on a particular genre or even particular artist to output similar works,[30] one could argue it is directly competing in the same market, making it highly unlikely to qualify for fair use.

The Stakeholders

There exists four key stakeholders when discussing authorship, but also ownership of AI generated works-

1. The programmer of the AI
2. The owner of the AI
3. The user of the software, or
4. The software itself

Recalling the discussion regarding Section 2(d)(vi) of the Indian Copyright Act, 1957, the question that arises is: who has "caused the work to be created".[31]

[26] Available at:https://www.uspto.gov/sites/default/files/documents/OpenAI_RFC-84-FR-58141.pdf
[27] Authors Guild, Inc. v. Google Inc., No. 13-4829-cv (2d Cir. Oct. 16, 2015).
[28] Towards Data Science, *The Most Important Court Decision For Data Science and Machine Learning,* Available at https://towardsdatascience.com/the-most-important-supreme-court-decision-for-data-science-and-machine-learning-44cfc1c1bcaf.
[29] *Id.*
[30] *Supra* note 4.
[31] Section 2(d)(vi) of the Copyright Act, 1957.

The initial answer one would have to this question would be to look towards the programmer of the AI. However this viewpoint comes with its pitfalls. Due to the aforementioned way in which AI 'generates' works through observation instead of detailed instructions, it is evident that the programmer has little control over how the work is generated.[32] In the instances where the programmer is not the owner, a similar issue arises. The works generated cannot be said to have been made in the course of employment or contractually as per Section 17(a),(b) or (c), as the AI cannot be in the "course of employment" or have signed a contract.[33]

The same is the issue with attributing authorship to the user of the software. The author is of the opinion that mere inputting of parameters like tempo and genre into the software which then outputs the musical work cannot be said to have "been caused" by the user. Nor does such inputting of parameters fulfil the requirement of a composer to be an author of the musical work under Section 2(d)(ii).[34]

Thus it is clear that Section 2(d)(vi) is limited in its scope to AI assisted works, where a human (either the programmer or the user) has some involvement, and does not apply to purely AI generated works. However musical and other artistic works are now being made with minimal human involvement, with some arguably purely AI generated. In such cases, the only stakeholder remaining as discussed above is the AI itself. The current legality of such a scenario is discussed below.

4. Current status

Although the AI *Sofia* was ostensibly accorded personhood in Saudi Arabia[35], if one looks at jurisdictions globally, it emerges that it is not standard practice to recognise AI software programmes as legal persons.[36]

[32] *Supra* note 24.
[33] Spicy IP, *Shenzen Tencent v. Shanghai Yinxun: AI Authors, Copyright and Some (Hard) Lessons for India*, available at https://spicyip.com/2020/08/shenzen-tencent-v-shanghai-yinxun-ai-authors-copyright-and-some-hard-lessons-for-india.html.
[34] Section 2(d)(ii) of the Copyright Act, 1957.
[35] Bill of Health: Harvard Law School, *AI Citizen Sophia and Legal Status*, available at https://blog.petrieflom.law.harvard.edu/2017/11/09/ai-citizen-sophia-and-legal-status/
[36]The Northwestern Journal of Technology and Intellectual Property Blog, *Copyright Issues for AI and Deep Learning Services: A Comparison of U.S., South Korean, and Japanese Law*, available at

The incentive theory for copyright which serves as a bedrock for US copyright law indicates that the purpose of copyright is to incentivize and motivate artists and inventors for the labour that they put into their works and to reward them.[37] This rationale does not apply to AI software programmes.

The personality theory of copyright[38] which suggests that the personality of the author is embedded within the work created also does not support granting authorship to AI. The concept of moral rights, as recognised in Sections 57 and 38B of the Indian Copyright Act could be considered to stem from this theory. Justice Pradeep Nandrajog's observation in *Amar Nath Sehgal v. Union of India, 2005,*[39] that 'a creative individual is uniquely invested with the power and mystique of original genius, creating a privileged relationship between a creative author and his work' seems to support the proposition that AI imparts no personality to its work, and is incapable of possessing moral rights to the works it generates. Also, in *Tech Plus Media Pvt. Ltd. v. Jyoti Janda, 2014,*[40] the Delhi High Court observed that a juristic person 'is incapable of being the author of any work in which copyright may exist'.

However, India is clearly aware of the merits and pitfalls involved in the use of AI to create works although its position is somewhat confusing. In 2021, a parliamentary standing committee 'Review of the Intellectual Property Rights Regime in India' noted that a revisiting of the IPR framework is necessary to extract the benefits from Artificial Intelligence.[41] Earlier, in 2018, the Indian Copyright Office said that, for the purpose of copyright, only a natural person's details must be provided as author of the work.[42]

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https://jtip.law.northwestern.edu/2021/05/28/copyright-issues-for-ai-and-deep-learning-services-a-comparison-of-u-s-south-korean-and-japanese-law/

[37] Sony v Universal, 464 U.S. 417 (1984). Also see: https://www.copyright.gov/rulings-filings/review-board/docs/a-recent-entrance-to-paradise.pdf, Naruto v. Slater, No. 16-15469 (9th Cir. 2018)

[38] The Ohio State University, *Theories of Copyright*, available at https://library.osu.edu/site/copyright/2014/05/09/theories-of-copyright.

[39] Amar Nath Sehgal v. Union of India, 2005 (30) PTC 253 Del.

[40] Tech Plus Media Private Ltd. v. Jyoti Janda, (2014) 60 PTC 121.

[41] Department Related Parliamentary Standing Committee on Commerce, 161st Report presented to the Rajya Sabha on 23 July 2021, Available at https://rajyasabha.nic.in/rsnew/Committee_site/Committee_File/ReportFile/13/141/161_2021_7_15.pdf

[42] Statement of Particulars, Page 10, re Col. 7 of the 2018 Practice and Procedure Manual of the Indian Copyright Office (Draft Copy), available at https://copyright.gov.in/Documents/Public_Notice_inviting_reviews_and_comments_of_stakeholders_on_draft_guidelines/Literary_Work.pdf

Countries like New Zealand[43] and Ireland,[44] similar to India, restrict their legal provisions of authorship of computer generated works to a "person" who has caused its creation. The position in the United States is that only a human can be an Author of a work. This was seen in the famous *Naruto v Slater* case where the court held that a monkey could not be the Author of the photograph clicked by it.[45] The same view is reflected by the US Copyright Office as they require human authorship[46] and "will not register works produced by a machine or mere mechanical process that operates randomly or automatically without any creative input or intervention from a human author".[47]

Looking at the jurisprudence across nations, it is clear that the majority view is that Copyright is Anthropocentric in nature. Even in recent cases like the Tencent case where Copyright was conferred over an AI generated work,[48] the Chinese Court made its decision based on the creative input given by the humans involved. This is best summarised by Peter Mezei as "originality is generally fixed to authorship and subject matter, both of which are closely connected to humans and human achievements".[49]

5. AI works in the public domain

The idea that works generated by AI should belong in the public domain is not a new one.[50] The author through the previous sections has tried to highlight the numerous potential issues of assigning copyright protection to AI generated works. The author also highlights the highly anthropocentric nature of copyright and how AI is not creative enough, which is reflected in most countries by giving copyright protection to

[43] Copyright Act 1994, ss 2, 5(2)(a) (N.Z.).
[44] Copyright and Related Rights Act 2000 (Act. No. 28/2000) (Ir.), Part I, § 2, § 21(f).
[45] Naruto v. Slater, 888 F.3d 418, 420 (9th Cir. 2018).
[46] U.S.Copyright Office.,*Compendium Of U.S.Copyright Office Practices,* § 306 (3d ed. 2017),available at https://www.copyright.gov/comp3/chap300/ch300-copyrightable-authorship.pdf.
[47] U.S.Copyright Office.,*Compendium Of U.S.Copyright Office Practices,* § 313.2 (3d ed. 2017),available at https://www.copyright.gov/comp3/chap300/ch300-copyrightable-authorship.pdf.
[48] Shenzhen Tencent Comput. Sys. Co. v. Shanghai Yingxun Tech. Co., (People's Ct. of Nanshan (Dist. Of Shenzhen) Dec. 24, 2019) (China).
[49] Péter Mezei, *You Ain't Seen Nothing Yet' – Arguments against the Protectability of AI-generated Outputs by Copyright Law,* (2021) available at SSRN: https://ssrn.com/abstract=3890051.

[50] *Supra* note 25.

the humans involved in the creation of AI assisted works. Thus, the author argues that AI generated work, which currently requires minimal human input, should belong to the public domain. There exists no benefits to providing copyright protection, and in fact there exists multiple benefits for such works to be in the public domain. As Pamela Samuelson states in her work, that there exists no reason to provide protection to such works as AI is an entity which does not need them in the first place.[51]

Often the argument is made that not providing copyright protection to such works would stifle creativity and hinder further innovation. The author, however, states that the opposite is true. Innovation can be negatively impacted due to roadblock of licensing.[52] Furthermore, AI is not motivated by economic incentives or inspiration. The generation of such works do not require much labour either, making it a real possibility that hundreds and thousands of songs can be generated very quickly, saturating the market. If monopoly is given to such works, it would significantly impact human musicians in a negative way. The companies and people developing such AI are already getting incentives and protection in the AI itself, with them also having copyright in the resulting generated works being excessive.

AI generated music does have several merits. It could serve as a tool to alleviate writer's block, to bring to light new ideas in music theory that have never been explored before (in the way that neural networks in chess and other games have introduced new styles of playing the games), and even simply to enhance the quality of music made.

Therefore, since the AI itself cannot be the Author of AI generated works currently, it is a futile pursuit to warp the current copyright framework to unnecessarily provide protection to a human involved in the 'generating' the works. Instead, the Author proposes a model whereby all such generated works enter the public domain without dealing with the questions of Authorship and avoiding all the potential issues. A system like Creative Commons Attribution licensing could be envisaged,[53] wherein others can "distribute, remix, adapt, and build upon your work, even commercially" as long as credit can be attributed to the AI generating software. This way, aforementioned music generating companies like AIVA can continue to charge for

[51] Pamela Samuelson, *Allocating Ownership Rights in Computer-Generated Works*, 47 University of Pittsburgh Law Review 1185 (1986).
[52] James Boyle, The Public Domain: Enclosing the Commons of the Mind, (2008).
[53] Available at: https://creativecommons.org/licenses/.

their services of producing AI generated background music, but the music itself would be in the public domain.

6. Conclusion

The aim of this essay has been to argue for bypassing all of the discussion of who should possess Authorship/Ownership of AI generated works and instead letting the works be in the public domain. The first two sections dealt with explaining how the technology works and the numerous issues that come with assigning protection to such works. Building upon that, the next sections examined how the copyright laws in most countries fail to accommodate such works and why such accommodation is not needed in the first place.

A deeper understanding of why humans listen to music lies at the heart of examining AI generated music. The many reasons to listen to music include the technical expertise of an individual with their instrument, the story and emotion that an artist conveys, and the experience of listening to live music. AI-generated music provides none of these inducements to listen to music, and much like other such new age technologies, seeks to solve a problem that does not exist. The current softwares may give a mirage of possessing creativity, but such softwares inherently lacks intention and inspiration. An AI generated software is not inspired on a rainy day nor has it spent years practising its instrument to give the perfect, yet flawed performance. It does however have its place as discussed above, like AI assistive softwares. With AI generated Works entering the public domain, it only furthers human creativity. Copyright protection being given to such works are also not necessary to incentivise the developers behind such AI. With AI generated works being in the public domain, not only are all potential issues solved, but it can further human creativity and continue to evolve.