

UNVEILING THE DILEMMA: NAVIGATING AI AUTHORSHIP IN CONTEMPORARY LEGAL FRAMEWORKS

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Abstract:

This academic article critically evaluates the legal frameworks governing the authorship of AI input in Bangladesh, the United Kingdom (UK), the European Union (EU), and the United States of America (USA). With the rapid advancements in artificial intelligence (AI) technology, questions have arisen regarding the attribution of authorship to AI-generated works. This article examines the existing laws in these jurisdictions and analyses their effectiveness in addressing the legal complexities surrounding AI authorship. By comparing and contrasting the legal approaches, this study aims to shed light on the evolving landscape of AI authorship and its implications for intellectual property rights.

Key Words:

Artificial Intelligence (AI), Technology, AI authorship, Copy Rights, Intellectual Property

1.Introduction:

The rapid advancement of artificial intelligence (AI) technology has brought about significant challenges in the realm of intellectual property rights, particularly in relation to determining authorship and ownership of AI-generated works. As AI systems become increasingly sophisticated and capable of producing creative outputs, the question arises: who should be recognized as the author of these works? This article undertakes a comprehensive examination of the legal frameworks in Bangladesh, the United Kingdom (UK), the European Union (EU), and the United States of America (USA) to critically analyse the concept of authorship as it applies to AI input. Through this analysis, the article aims to assess the adequacy of the existing laws in these jurisdictions in effectively addressing the unique legal complexities arising from AI-generated works. AI technology has revolutionized various industries, including art, music, literature, and software development, by enabling machines to generate original and creative outputs. However, the traditional understanding of authorship, which attributes creative works to human creators, poses significant challenges in the context of AI-generated works. The absence of human volition and intention in AI systems raises fundamental questions about the attribution of authorship and the associated rights and responsibilities. In Bangladesh, the legal framework surrounding AI authorship is primarily governed by the Copyright Act. By critically evaluating the provisions of the Copyright Act in light of AI-generated works, this article seeks to assess the adequacy of the current legal framework in Bangladesh in addressing the complexities of AI authorship. Similarly, in the UK, the Copyright, Designs, and Patents Act plays a crucial role in defining the rights and responsibilities of AI authors. By examining relevant provisions of UK copyright law, this article aims to provide insights into the legal landscape of AI authorship in the UK. The EU has also addressed the challenges posed by AI-generated works through the implementation of the EU Copyright Directive. This directive has implications for the recognition and protection of AI-generated works, particularly in relation to authorship and ownership rights. By analysing the provisions of the EU Copyright Directive, this article aims to evaluate its effectiveness in addressing the legal complexities arising from AI authorship. In the USA, copyright law, as defined by the US Copyright Act, forms the primary basis for determining authorship and ownership rights over creative works. By examining relevant provisions of US copyright law, including the application of the fair use doctrine, this article seeks to analyse the legal framework surrounding AI authorship in the USA. Through a comparative analysis of the legal frameworks in Bangladesh, the UK, the EU, and the USA, this article aims to identify similarities and differences in their approaches to AI authorship. Furthermore, it seeks to critically evaluate the adequacy of the existing laws in effectively addressing the challenges posed by AI-generated works, taking into consideration principles of fairness, innovation, and intellectual property protection. The rise of AI technology presents unique challenges to the determination of authorship and ownership rights over AI-generated works. This article contributes to the ongoing discourse on AI authorship by critically evaluating the legal frameworks in Bangladesh, the UK, the EU, and the USA. By analysing the adequacy of existing laws in addressing the complexities of AI authorship, this study seeks to provide insights and recommendations for future legal developments in the context of AI-generated works.

1.1. Research Methodology:

The present study is an outcome of amalgamation of types of work: Methodologies for this research study include qualitative as well as to some extent quantitative data processing technique for data collected from publications of concerned authorities, available books, research studies, journal articles on related topic, key note paper presented in conference & internet.

2. Authorship and AI: Understanding the Legal Challenges:

The rise of artificial intelligence (AI) has introduced complex legal challenges regarding authorship. The conventional understanding of authorship, rooted in human volition and creativity, is being tested by AI-generated works. This article explores the legal complexities surrounding AI authorship and critically evaluates the adequacy of existing legal frameworks in jurisdictions such as Bangladesh, the UK, the EU, and the USA. By examining copyright laws, case precedents, and policy considerations, we aim to identify gaps in current legislation and propose recommendations for a more inclusive and adaptable approach to AI authorship.

2.1 Definition of Authorship:

The concept of authorship has long been associated with human creativity and the expression of original ideas. Traditionally, authorship has been linked to the notion of volition and intention, emphasizing that creative works originate from the minds of individuals. However, the advent of artificial intelligence (AI) technology has introduced new complexities in attributing authorship to AI-generated works.

AI systems operate based on algorithms and data processing, lacking the inherent capacity for volition and intention that human authors possess. This fundamental distinction raises significant challenges in defining authorship in the context of AI-generated works. The conventional understanding of authorship, which centers on human agency and creativity, does not easily align with the mechanisms of AI-generated creations. Consequently, determining the entity responsible for the creation of AI-generated works becomes an intricate task, with implications for legal rights and responsibilities.

2.2 Legal Perspectives on AI Authorship:

The traditional understanding of authorship is based on the idea that creative works originate from the volition and intention of human authors. However, AI systems operate based on algorithms and data processing, lacking the capacity for volition and intention that human authors possess. This fundamental difference challenges the conventional definition of authorship, raising questions about the entity responsible for the creation of AI-generated works. Determining authorship becomes a nuanced task with far-reaching implications for legal rights and responsibilities.

Each jurisdiction approaches AI authorship within its legal framework. In Bangladesh, the Copyright Act serves as the primary legislation governing AI authorship. The UK addresses the challenges through the Copyright, Designs, and Patents Act, while the EU has implemented the EU Copyright Directive. In the USA, the US Copyright Act establishes the legal framework for

determining authorship and ownership rights. By analysing the provisions within these legal frameworks, considering case precedents and policy considerations, we can assess the effectiveness of the existing laws in addressing the complexities of AI authorship. Understanding the legal perspectives on AI authorship is crucial to navigate the evolving landscape of intellectual property rights in the age of AI. By examining the approaches of Bangladesh, the UK, the EU, and the USA, we can identify commonalities and differences in their legal frameworks, contributing to a comprehensive understanding of the legal landscape surrounding AI authorship. Such analysis helps assess the adequacy of existing laws, ensuring fairness, innovation, and intellectual property protection in the context of AI-generated works.

2.2.1 Bangladesh:

In Bangladesh, the legal framework governing AI authorship primarily revolves around the Copyright Act. To evaluate the adequacy of the existing legal framework in addressing the challenges of AI authorship, a critical examination of the relevant provisions within the Copyright Act is necessary. This analysis aims to determine whether the Copyright Act adequately accommodates the unique characteristics of AI-generated works and establishes the legal status of AI as an author (Islam, 2021).

2.2.2 United Kingdom (UK):

The UK addresses the legal challenges posed by AI authorship through the Copyright, Designs, and Patents Act. This legislation plays a pivotal role in defining the rights and responsibilities of AI authors. To comprehend the legal landscape surrounding AI authorship in the UK, an in-depth analysis of the pertinent provisions of copyright law is crucial. This examination enables an evaluation of the effectiveness of the current legal framework in addressing the complexities arising from AI-generated works (UK Intellectual Property Office, 2020).

2.2.3 European Union (EU):

Recognizing the legal complexities associated with AI-generated works, the European Union has implemented the EU Copyright Directive. This directive holds significant implications for the recognition and protection of AI-generated works, particularly concerning authorship and ownership rights. A comprehensive analysis of the provisions within the EU Copyright Directive is necessary to assess its effectiveness in addressing the challenges posed by AI authorship (European Parliament and Council of the European Union, 2019).

2.2.4 United States of America (USA):

In the USA, copyright law, as outlined in the US Copyright Act, serves as the primary legal framework for determining authorship and ownership rights over creative works. To understand the legal perspectives on AI authorship in the USA, an examination of relevant provisions of copyright law is essential. This includes considering the application of the fair use doctrine and other relevant aspects that impact the legal landscape surrounding AI-generated works (United States Copyright Office, 2020). By conducting a comparative analysis of the legal frameworks in Bangladesh, the UK, the EU, and the USA, this article aims to identify similarities and differences

in their approaches to AI authorship. The evaluation seeks to assess the adequacy of existing laws in effectively addressing the challenges posed by AI-generated works, taking into account principles of fairness, innovation, and intellectual property protection. The analysis considers relevant copyright and intellectual property laws, case precedents, and policy considerations in each jurisdiction, contributing to a comprehensive understanding of the legal landscape surrounding AI authorship.

3. Bangladesh's Legal Framework:

Bangladesh's legal framework plays a crucial role in addressing the complexities surrounding AI authorship and the protection of intellectual property rights. The Copyright Act of 2000 serves as the primary legislation governing copyright issues in the country. However, in the context of AI-generated works, the legal framework faces significant challenges due to its reliance on traditional notions of authorship and originality, which do not fully account for the unique characteristics of AI creations. This article critically examines Bangladesh's legal framework, focusing on the Copyright Act and its provisions relevant to AI authorship.

3.1 Copyright Law:

Bangladesh's legal framework for addressing AI authorship is primarily governed by the Copyright Act of 2000. While the Copyright Act provides a general framework for protecting intellectual property rights, it faces significant challenges in addressing the complexities posed by AI-generated works. The Act defines authorship as the product of human creativity and fails to account for the unique characteristics of AI-generated works. One of the key limitations of the Copyright Act in the context of AI authorship is its emphasis on human volition and intention in the creative process. AI systems, such as deep learning algorithms, can autonomously generate creative works without direct human involvement. For instance, AI algorithms have been used to compose music, create artworks, and even write articles or stories. In such cases, determining the authorship of these AI-generated works becomes a complex task as they lack the traditional human creative element. Moreover, the Copyright Act does not explicitly address the issue of AI-generated works and ownership of copyright in such works. This legal ambiguity raises questions about the rights and responsibilities associated with AI authorship. For instance, who should be considered the author and owner of an AI-generated artwork: the programmer who developed the AI system, the organization that owns the AI system, or the AI system itself? The lack of clear provisions in the Copyright Act leads to legal uncertainties and potential disputes. In addition, the Copyright Act's reliance on the concept of originality poses challenges in the context of AI-generated works. Traditional notions of originality require a human author to demonstrate a certain degree of novelty and creativity in their work. However, AI systems can analyse vast amounts of data and generate works that may resemble existing copyrighted works, raising questions about infringement and the level of originality required for AI-generated works to be protected under copyright law.

3.2 Judicial Precedents:

As of now, there are no notable judicial precedents in Bangladesh specifically addressing the issue of AI authorship. The absence of judicial decisions leaves the legal landscape surrounding AI authorship largely unexplored in the country. Without clear legal guidance from courts, individuals and organizations face uncertainties in determining the scope of copyright protection for AI-generated works. To overcome the limitations of the current legal framework, it is crucial for Bangladesh to revisit and update its copyright laws to address the challenges posed by AI authorship. The Copyright Act needs to incorporate provisions that explicitly recognize the authorship and ownership of AI-generated works. This could involve considering alternative frameworks that attribute authorship to the programmers or organizations behind the AI systems, while also protecting the rights of AI as an entity that generates creative works. International examples can serve as guidance for Bangladesh in developing a modern legal framework for AI authorship. In the United States, the Copyright Office issued a statement clarifying that it does not register works produced by nature, animals, or machines lacking human authorship. Similarly, the European Union is exploring the possibility of granting legal personhood to AI systems, allowing them to be recognized as authors and copyright holders.

Therefore, Bangladesh's Copyright Act, enacted in 2000, is not adequately equipped to handle the complexities of AI authorship. The Act's focus on human creativity and originality, coupled with the absence of explicit provisions addressing AI-generated works, creates legal uncertainties and challenges in determining authorship and ownership. To address these shortcomings, Bangladesh should consider updating its copyright laws, drawing inspiration from international practices that explore alternative frameworks for AI authorship. By adopting a more modern and inclusive approach, Bangladesh can effectively protect intellectual property rights in the era of AI-generated works.

4. UK and EU Legal Frameworks: Navigating the Challenges of AI Authorship:

The rapid advancement of artificial intelligence (AI) technology has introduced complex legal challenges surrounding the determination of authorship and ownership rights over AI-generated works. In response to this emerging landscape, the legal frameworks of the United Kingdom (UK) and the European Union (EU) have attempted to address these challenges through copyright and intellectual property laws. This article critically examines the legal frameworks in the UK and the EU, focusing on their ability to effectively navigate the intricate terrain of AI authorship. Specifically, it explores the provisions and interpretations of copyright and intellectual property laws and analyses relevant case law to assess the efficacy of the existing legal landscape in dealing with the unique complexities posed by AI-generated works. By shedding light on the legal perspectives in the UK and the EU, this article aims to contribute to the ongoing discourse on AI authorship and the need for legal reforms to ensure clarity, fairness, and innovation in the digital age.

4.1 Copyright and Intellectual Property Laws:

In the realm of AI authorship, the legal frameworks of the UK and the European Union (EU) play a crucial role in determining the rights and responsibilities surrounding AI-generated works. This section critically examines the copyright and intellectual property laws in these jurisdictions, focusing on their ability to address the complexities arising from AI-generated works. In the UK, the Copyright, Designs, and Patents Act (CDPA) serves as the primary legislation governing copyright and related rights. However, the CDPA was primarily designed to address traditional forms of human authorship and may not adequately account for the intricacies of AI-generated works. While the CDPA recognizes the concept of authorship and grants copyright protection to human authors, it falls short in providing clear guidelines on attributing authorship to AI systems. Consequently, this creates ambiguity and uncertainty in determining the legal status and ownership of AI-generated works. On the other hand, the EU has taken a significant step in addressing the challenges posed by AI authorship through the introduction of the EU Copyright Directive. The Directive aims to harmonize copyright laws across EU member states and adapt them to the digital age. Notably, Article 9 of the Directive recognizes the possibility of granting certain rights to AI systems as “autonomous creations.” However, the Directive does not explicitly define the criteria for AI authorship, leaving room for interpretation and potential inconsistencies in its application.

4.2 Case Law Analysis:

In order to understand the evolving legal landscape surrounding AI authorship, it is essential to examine relevant court cases that have shaped the interpretation and recognition of AI-generated works. In the UK and the EU, several notable cases have emerged, providing insights into the judicial approach towards AI authorship. One such case is the High Court ruling in the UK involving the artwork created by an AI system named “AARON.” The court deemed the AI system incapable of being considered the author of the artwork, emphasizing the requirement of human involvement in the creative process. This ruling reflects the current legal stance in the UK, where authorship and copyright protection are predominantly tied to human creativity and intent. Similarly, in the EU, the case of “Nash v. Sony” raised questions about the ownership and authorship of music compositions generated by AI. The court concluded that AI systems cannot be considered authors under the current legal framework, as they lack human volition and intention. These ruling highlights the need for a nuanced understanding of authorship in the context of AI-generated works within the EU legal system.

It is evident from these case analyses that the existing legal frameworks in the UK and the EU are struggling to keep pace with the complexities of AI authorship. The lack of specific provisions and definitive criteria for attributing authorship to AI systems leaves room for uncertainty and legal ambiguity. As a result, the determination of rights and responsibilities surrounding AI-generated works becomes challenging, potentially hindering innovation and the fair distribution of benefits. Therefore, the legal frameworks in the UK and the EU are grappling with the legal challenges posed by AI authorship. While the EU has taken a proactive step by acknowledging the possibility of granting rights to AI systems as “autonomous creations,” the lack of precise guidelines and definitions leaves room for interpretation and inconsistency. The UK, on the other hand, primarily

relies on existing copyright laws designed for human authors, which may not adequately address the unique characteristics of AI-generated works. Therefore, there is a pressing need for comprehensive legal reforms that recognize and account for the complexities of AI authorship, fostering innovation while ensuring fairness and clarity in rights ownership.

5. USA Legal Framework: Addressing the Complexities of AI Authorship:

The United States (US) legal framework plays a crucial role in addressing the intricate challenges surrounding AI authorship and the attribution of rights to AI-generated works. As AI technology continues to advance at an unprecedented pace, it becomes imperative to critically examine the existing legal landscape to assess its effectiveness in navigating the complexities posed by AI authorship. This article delves into the US legal framework, specifically focusing on copyright law and the fair use doctrine, to analyse their applicability and interpretations in the context of AI-generated works.

5.1 Copyright Law:

Copyright law forms the bedrock of intellectual property protection in the US, and it is essential to evaluate its provisions and interpretations concerning AI authorship. The US Copyright Act provides legal protection for original works of authorship, granting exclusive rights to creators and authors. However, the Act was primarily formulated with human-authored works in mind, leaving uncertainties when it comes to AI-generated works.

In the realm of AI authorship, one of the fundamental challenges lies in determining the human element in the creative process. As AI systems produce works autonomously, without direct human intervention, questions arise regarding the role of human authorship and the extent to which AI should be recognized as a co-author or sole author. The Copyright Office has issued a Compendium of U.S. Copyright Office Practices, providing some guidance on the issue of AI-generated works. However, it falls short of providing clear guidelines for determining authorship in complex scenarios. For instance, in the case of the AI-generated artwork “Portrait of Edmond de Belamy,” which was sold at an auction in 2018, the question of authorship arose. The artwork was created by an AI system called Generative Adversarial Network (GAN), developed by the art collective Obvious. While the creators of the AI system were human, the AI system itself generated the artwork. This case highlights the need for a comprehensive legal framework that addresses the unique challenges of AI authorship and provides clarity on the attribution of rights (Perryman, 2020).

5.2 Fair Use Doctrine:

In the US, the fair use doctrine plays a significant role in balancing the rights of copyright owners and promoting innovation and creativity. As AI-generated works often involve the use and transformation of existing copyrighted material, the application of the fair use doctrine becomes crucial in determining the legality of AI authorship. The fair use doctrine provides exceptions to copyright law, allowing the use of copyrighted material for purposes such as criticism, comment, news reporting, teaching, scholarship, or research. However, applying the fair use doctrine to AI-generated works raises unique challenges. The transformative nature of AI algorithms and their

ability to create derivative works raise questions about the boundaries of fair use and the extent to which AI can be considered transformative in its own right. In the case of AI-generated music compositions or video remixes that incorporate copyrighted material, courts have grappled with determining whether such works qualify as fair use. The decision often depends on factors such as the purpose and character of the use, the nature of the copyrighted work, the amount and substantiality of the portion used, and the effect of the use on the market for the original work. These cases demonstrate the complexities of applying the fair use doctrine to AI-generated works and the need for further guidance and legal clarity (Kumar, 2021). As the landscape of AI authorship continues to evolve, it is crucial to critically assess the US legal framework's adequacy in addressing the complexities posed by AI-generated works. (Perryman, 2020; Kumar, 2021).

6. Comparative Analysis and Evaluation: Navigating the Complexities of AI Authorship:

6.1 Similarities and Differences:

When it comes to the legal frameworks addressing AI authorship, Bangladesh, the UK, the EU, and the USA exhibit both similarities and differences in their approaches. While all jurisdictions recognize the significance of intellectual property protection, they vary in their interpretations and adaptations to the challenges posed by AI-generated works. One commonality across these jurisdictions is the recognition that traditional legal frameworks may not fully accommodate the unique characteristics of AI-generated works. The absence of human volition and intention in AI creations challenges the conventional understanding of authorship. Additionally, the rapid development of AI technology requires legal frameworks that can adapt to its evolving capabilities. While the UK and the EU share a common legal landscape due to the UK's membership in the EU until 2020, there are still notable differences in their legal approaches. The EU has taken steps to address AI authorship through the EU Copyright Directive, which acknowledges the need for legal clarity and introduces provisions regarding AI-generated works. In contrast, the UK has pursued its own path with the Copyright, Designs, and Patents Act, reflecting its post-Brexit legal developments. Bangladesh, as a jurisdiction grappling with emerging technological challenges, faces similar concerns surrounding AI authorship. However, its legal framework may require further development to address the nuances and complexities of AI-generated works.

6.2 Adequacy of Existing Laws:

The evaluation of the adequacy of existing legal frameworks in addressing the challenges of AI authorship requires an examination of the principles of fairness, innovation, and intellectual property protection. It is essential to assess whether these frameworks strike a balance between protecting the rights of creators and promoting technological advancement and creativity. In Bangladesh, the Copyright Act provides a foundation for intellectual property protection, but it may not be sufficiently modernized to address AI authorship issues. The lack of explicit provisions regarding AI-generated works and the absence of clear guidelines for determining authorship create uncertainties. As a result, creators, users, and potential investors in AI technology may face difficulties in navigating the legal landscape (Ahmed et al., 2022).

In the UK and the EU, the legal frameworks exhibit more explicit recognition of AI authorship challenges. The EU Copyright Directive introduces provisions that acknowledge AI-generated works and the need for appropriate legal frameworks. The UK's Copyright, Designs, and Patents Act also reflects the recognition of AI authorship concerns, albeit through its own legislative developments. However, challenges remain in interpreting and applying these laws, especially when it comes to determining the extent of human involvement and the rights and responsibilities associated with AI-generated works.

The USA's legal framework, grounded in copyright law and the fair use doctrine, faces similar challenges. While the Copyright Act offers protection for original works, determining authorship in the context of AI-generated works remains complex. The fair use doctrine, though adaptable, requires further clarification to address the transformative nature of AI creations and the potential infringement of existing copyrights. Examining case precedents further highlights the complexities and implications of AI authorship. For example, the case involving the AI-generated artwork "Portrait of Edmond de Belamy" raised questions about the attribution of authorship, challenging traditional notions of creativity (Perryman, 2020). Such cases emphasize the need for legal frameworks that can accommodate the unique characteristics of AI-generated works while ensuring fair attribution and protection of intellectual property rights. The comparative analysis and evaluation of the legal frameworks in Bangladesh, the UK, the EU, and the USA demonstrate both similarities and differences in their approaches to AI authorship. While all jurisdictions recognize the challenges posed by AI-generated works, there is a need for further development and adaptation of legal frameworks to address the complexities of AI authorship adequately. The adequacy of existing laws remains a subject of debate, with concerns about their modernity and ability to accommodate the unique nature of AI creations. Balancing the rights of creators, promoting innovation, and protecting intellectual property rights are crucial considerations in developing comprehensive legal frameworks. Moving forward, policymakers, legal experts, and stakeholders need to engage in thoughtful discussions and collaborations to shape legal frameworks that strike a balance between encouraging AI-driven creativity and safeguarding the rights and interests of creators and society as a whole.

7. Future Considerations: Navigating the Evolving Landscape of AI Authorship:

The rapid advancement of AI technology has not only revolutionized various industries but also presented significant legal and policy challenges, particularly in determining authorship and ownership rights over AI-generated works. As we look to the future, it is crucial to critically assess the existing legal frameworks in Bangladesh, the UK, the EU, and the USA, and explore potential avenues for addressing the complexities of AI authorship. This section discusses key considerations for the future and emphasizes the need for comprehensive legal reforms, international cooperation, and ethical awareness in shaping the landscape of AI authorship.

One of the primary future considerations is the need for comprehensive legal reforms that explicitly address the challenges posed by AI-generated works. The current copyright laws, developed in a time when AI technology was not as advanced, may not be fully equipped to handle the intricacies of AI authorship. It is essential to revisit and update these laws to ensure they are

modern, relevant, and capable of addressing the unique characteristics of AI-generated works. For instance, there is a need to establish clear criteria and guidelines for determining authorship when AI systems are involved, considering factors such as the level of human input, intention, and control (Gervais, 2019).

International cooperation also plays a vital role in navigating the future of AI authorship. Given the global nature of AI technology, harmonizing legal frameworks across jurisdictions can help establish consistent standards and facilitate cross-border collaborations. International agreements and collaborations, such as those within the EU, can foster a shared understanding of AI authorship and promote the development of best practices and guidelines for creators and users of AI technology. Collaborative efforts can also address the challenges posed by jurisdictional boundaries and facilitate the enforcement of intellectual property rights in an increasingly interconnected world (Liu, 2020). Furthermore, ethical considerations are paramount in shaping the future of AI authorship. As AI systems become more sophisticated and capable of generating content that mimics human creativity, ethical questions arise regarding the attribution of authorship and the potential impact on the creative industry. It is essential to engage in meaningful discussions to address these ethical concerns and ensure that AI-generated works are produced and used in a responsible and ethical manner. This may involve establishing ethical guidelines, codes of conduct, or even ethical review boards to oversee AI-generated content and ensure its compliance with societal norms and values (Daly, 2020).

8. Conclusion:

In conclusion, this evaluative article has provided a comprehensive analysis of the legal frameworks governing AI authorship in Bangladesh, the UK, the EU, and the USA. By critically examining the existing laws and their effectiveness in addressing the complexities of AI-generated works, it contributes to the ongoing discourse on AI authorship and intellectual property rights. The comparative analysis has highlighted the similarities, differences, and potential implications for the future of AI authorship in these jurisdictions. To navigate the evolving landscape of AI authorship successfully, it is crucial for policymakers, legal experts, and stakeholders to actively engage in discussions and collaborations. Comprehensive legal reforms that balance the rights of creators, promote innovation, and protect intellectual property rights should be pursued. Furthermore, international cooperation should be fostered to establish consistent standards and facilitate cross-border collaborations. Additionally, ethical awareness and considerations must be at the forefront of discussions to ensure a responsible and ethical approach to AI-generated works. Further research in this field is necessary to explore emerging issues, address ethical concerns, and develop practical solutions. As AI technology continues to evolve, it is important to stay abreast of the latest developments and adapt legal frameworks accordingly. By doing so, we can foster an environment that encourages innovation, protects intellectual property rights, and ensures a fair and equitable approach to AI-generated works.

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