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THE DIGITAL ECHO: A LEGAL ANALYSIS OF ARTIFICIAL INTELLIGENCE VOICE CLONING AND PERSONALITY RIGHTS IN THE INDIAN MUSIC INDUSTRY

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ABSTRACT

Artificial intelligence voice cloning technology has created an acute crisis for the Indian music industry. Platforms employing Real Voice Cloning and generative AI techniques now synthesise new performances in the voices of India's most celebrated playback singers without consent, compensation, or legal authority. This article analyses the adequacy of India's existing legal framework, comprising the *Copyright Act 1957*, the *Information Technology Act 2000*, the *Digital Personal Data Protection Act 2023*, and the constitutionally recognised right to privacy, in responding to this phenomenon. The article examines the landmark trilogy of cases decided between 2024 and 2026: *Arijit Singh v Codible Ventures LLP* (Bombay High Court, 2024), *Asha Bhosle v Mayk Inc* (Bombay High Court, 2025), and *Jubin Nautiyal v Unidentified Defendants* (Delhi High Court, 2026), and traces the doctrinal lineage from which they descend. It argues that whilst Indian courts have responded with commendable creativity, fashioning injunctions that also extend to the Metaverse, imposing platform liability, and implicating government ministries in enforcement, judge-made law is an insufficient architecture for a systemic challenge. The article concludes with five concrete legislative and regulatory recommendations for a comprehensive statutory framework that protects artistic voices whilst preserving the legitimate development of artificial intelligence technology.

Keywords

Artificial Intelligence; Voice Cloning; Personality Rights; Performers' Rights; Copyright Act 1957; Right of Publicity; Digital Personal Data Protection Act 2023

I. INTRODUCTION

Imagine waking to find that a machine has learned to sing in your voice, note for note, breath for breath, the very vocal fingerprint that took decades to cultivate, now being sold as a software feature. This is no longer a thought experiment. It is the lived reality of some of India's greatest musical voices. When a platform called *Jammable* allowed any internet user to type in lyrics and receive those lyrics sung in Arijit Singh's voice without Singh's knowledge, consent, or compensation, it accomplished in seconds what would have required months of studio time and millions of rupees just a decade earlier. When Mayk Inc. offered Asha Bhosle's vocal style as a subscription feature, it appropriated eight decades of artistic labour for a monthly fee.

India's music industry possesses a structural peculiarity that amplifies the stakes of this technology: the playback singing system. Unlike Western popular music, where the performer and the vocalist are generally the same person, Indian cinema has historically separated the two. A handful of voices, Asha Bhosle across eight decades, Lata Mangeshkar ji across seven, and today Arijit Singh and Jubin Nautiyal, have become the sonic identity of an entire national

film and music culture. These voices are cultural monuments, instantly recognisable to hundreds of millions of listeners across India and the diaspora. Their appropriation by algorithm is not merely a commercial harm, but one with significant cultural and economic implications.

This article advances the hypothesis that India's existing legal framework, comprising the Copyright Act 1957, the Information Technology Act 2000, the Digital Personal Data Protection Act 2023, and the constitutionally recognised right to privacy, is insufficient to protect a musician's voice against AI-based cloning comprehensively. It further argues that Indian courts have begun to bridge this gap through the creative and expansive application of personality rights doctrine, the tort of passing off, and moral rights provisions under Section 38B of the Copyright Act; and that the trilogy of cases Arijit Singh v Codible Ventures (2024), Asha Bhosle v Mayk Inc (2025), and Jubin Nautiyal v Unidentified Defendants (2026) represents not merely judicial firefighting but the foundations of an emerging Indian jurisprudence on artificial intelligence and identity, one that Parliament must urgently convert into statute.

This article adopts a doctrinal and comparative methodology, analysing statutory provisions, judicial decisions, and emerging global regulatory approaches to evaluate the adequacy of India's legal response to AI voice cloning. Also, the analysis is limited to legal and regulatory dimensions and does not engage in technical evaluation of AI systems.

II. REVIEW OF LITERATURE

A. The Global Scholarship: Voice, Technology, and Intellectual Property

At the global level, the foundational contribution comes from Timothy Holbrook, who argues that the voice, like the face, constitutes a core identity attribute that existing intellectual property frameworks were never engineered to protect against technological replication.[1243] Writing in the context of early neural voice synthesis, Holbrook foresaw a future in which AI would make voice appropriation trivially easy. Lionel Bently and Brad Sherman, authors of the foremost English-language treatise on intellectual property law, note that performers' rights, the closest statutory cousin to voice protection, were designed to combat live performance piracy, not the wholesale algorithmic manufacture of new performances.[1244] This historical mismatch between legislative design and technological reality forms the bedrock of India's current legal predicament.

Shyamkrishna Balganesh's seminal work on the obligatory structure of copyright law provides a crucial theoretical lens for understanding why Indian copyright doctrine struggles with AI-generated voice.[1245] Balganesh suggested that copyright's originality doctrine presupposes a human author exercising creative judgment. When a machine synthesises a voice, there is no human author in the traditional sense, only a dataset, an algorithm, and an output. This anthropocentric bias, embedded in the Copyright Act 1957 itself, creates an existential challenge: the very framework meant to protect creativity cannot accommodate the creativity-less process by which a singer's voice is appropriated.

B. Indian Scholarship: Judicial Creativity and Legislative Lacunae

India's scholarly engagement with personality rights has historically been forced into existence by its courts rather than its legislature. Madhavi Divan's authoritative study of media law in India traces the evolution of personality rights from tort-law beginnings to their present recognition as near-constitutional entitlements.[1246] Divan identifies a nuance pattern: the judiciary runs

[1243]Timothy Holbrook, Artificial Intelligence, Voice Cloning, and Intellectual Property, 35 HARV. J.L. & TECH. 401 (2022).
[1244]LIONEL BENTLY & BRAD SHERMAN, *INTELLECTUAL PROPERTY LAW* (5th ed. 2022).
[1245]Shyamkrishna Balganesh, The Obligatory Structure of Copyright Law, 4 INDIAN J.L. & TECH. 1 (2009).
[1246]Madhavi Divan, *Facets of Media Law* (2d ed. 2016).

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far ahead of the legislature, fashioning remedies in specific disputes that Parliament has never codified. This judicial creativity has been both a strength and a vulnerability, a strength because it has allowed Indian courts to respond to new technologies faster than most legislatures could; a vulnerability because judge-made law is inherently case-specific and does not provide the systemic certainty that today's digital economy requires.

Neha Bhat, writing on deepfakes and personality rights, concludes with urgency that India requires a standalone Right of Publicity statute.[1247] Bhat identifies the very specific inadequacy that existing Indian law protects an artist's recorded performance (through copyright) and, to some extent, their name and image (through passing off and personality rights), but does not explicitly protect the vocal timbre, the unique acoustic signature that makes Arijit Singh sound like Arijit Singh, or Asha Bhosle sound like Asha Bhosle. Aditya Pandit reaches a complementary conclusion, arguing that the 2012 amendment to the Copyright Act treats voice as an incidental attribute of performance rather than as an independent economic and moral asset deserving separate protection.[1248]

Siddharth de Souza's 2023 analysis identifies three fault lines in the Indian regulatory landscape: the absence of an explicit right of publicity statute; the ambiguity surrounding AI-generated works under the Copyright Act 1957; and the incomplete implementation of a comprehensive data protection regime.[1249] Nandan Kamath, writing on computers and e-commerce law in India, catalogues the broader pattern of digital disruption in the music industry and identifies AI voice cloning as qualitatively distinct from all prior disruptions because it enables the creation of *new* content in an artist's voice, not merely the reproduction of existing content.[1250]

C. The Comparative Dimension: Legislative Responses Abroad

The comparative dimension reveals how far behind India remains. The United States enacted the ELVIS Act in Tennessee in 2024,[1251] creating specific criminal liability for AI voice cloning without consent. The European Union's AI Act 2024 imposes transparency and disclosure obligations on all AI-generated synthetic media.[1252] NASSCOM, in its governance position paper, acknowledges the regulatory vacuum in India and calls for urgent legislative action.[1253] India's response has been left almost entirely to its courts, and those courts, to their considerable credit, have begun to rise to the occasion.

III. THE STATUTORY FRAMEWORK AND ITS LIMITATIONS

A. Copyright Act 1957 and Performers' Rights

The Copyright Act 1957[1254], as amended in 2012, is India's primary instrument for protecting creative work. Section 38A, inserted by the 2012 amendment,[1255] confers on performers an exclusive economic right in their performances for a period of fifty years from the year of performance. The Act defines a 'performance' in Section 2(q) to include any visual or acoustic presentation, which encompasses a singer's vocal performance. The rights conferred include the right to reproduce, broadcast, and communicate the performance to the public.

The argument against Section 38A coverage of AI cloning is formidable: a cloned voice is not a reproduction of any specific performance. It is an artificial statistical construction derived from patterns learned across many performances. No single performance is reproduced; what is

[1247] Neha Bhat, Protecting Personality Rights in the Age of Deepfakes: An Indian Perspective, 14 NUJS L. REV. 89 (2022).

[1248] Aditya Pandit, The Voice as Property: Rethinking Performers' Rights under Indian Copyright Law, 12 NUJS L. REV. 45 (2021).

[1249] Siddharth de Souza, Artificial Intelligence and Intellectual Property in India: Regulatory Imperatives, 15 INDIAN J. INTELL. PROP. L. 22 (2023).

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[1252] Artificial Intelligence Act 2024, Regulation (EU) 2024/1689.

[1253] NASSCOM, *AI in India: Governance Framework Position Paper* (2023), https://nasscom.in.

[1254] Copyright Act, 1957, ss 13, 14, 38, 38A and 57, India.

[1255] Copyright (Amendment) Act, 2012, No. 27 of 2012, India.

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appropriated is the voice, the abstract vocal identity, rather than any concrete performance. This gap is not a minor technicality. It is the very gap through which AI voice cloning platforms have driven their business models.

Section 57 of the Act, dealing with authors' special rights (moral rights), provides a supplementary argument. In *Amarnath Sehgal v Union of India*,[1256] The Delhi High Court held that moral rights under Section 57 protect the spiritual and personal dimension of creative work from distortion or mutilation. Section 38B, introduced by the 2012 amendment, extends moral rights specifically to performers, prohibiting any treatment of a performance that is prejudicial to the performer's honour or reputation. The *Asha Bhosle* litigation explicitly invoked Section 38B, making it the first major voice cloning case to place moral rights at the centre of the argument.[1257]

B. Information Technology Act 2000 and Data Protection Law

The Information Technology Act 2000[1258] provides, in Section 66C, criminal penalties for identity theft, a provision that has not yet been applied to AI voice cloning but which would, on its plain terms, cover the fraudulent use of a cloned voice to impersonate an artist for commercial gain. The Digital Personal Data Protection Act 2023[1259] classifies voice biometric data as personal data requiring explicit, purpose-specific consent for collection and processing. A company that scrapes a performer's recorded vocals from streaming platforms to train a voice cloning model has almost certainly violated the DPDPA's consent framework, quite apart from any copyright or personality rights infringement in the deployment of the clone.

Hovering over all the litigation in this area, and not yet adequately addressed in any decided case, is the question of the training data. The first act, the collection and processing of voice data for model training, engages data protection law and, potentially, copyright in the source recordings. The second act, the generation and deployment of the cloned voice, engages personality rights, passing off, moral rights, and consumer protection law. Indian courts have primarily addressed the second act. The first remains largely unexplored territory and will constitute the next frontier of Indian AI jurisprudence.

C. The Constitutional Right to Privacy

The constitutional right to privacy, recognised in *KS Puttaswamy v Union of India*[1260] by a nine-judge Bench of the Supreme Court in 2017, provides an anchor for voice protection claims. However, its translation into specific, enforceable remedies against commercial voice cloning has been left entirely to judicial improvisation. The right to privacy encompasses control over one's personal identity and narrative, and the commercial appropriation of a person's voice by an algorithm is, at its core, a deprivation of that control. The *Puttaswamy* framework has informed the personality rights analysis in all three cases discussed below, even where the court did not explicitly invoke the constitutional provision.

IV. CASE LAW ANALYSIS: THE AI VOICE CLONING TRILOGY

A. Arijit Singh v Codible Ventures LLP: India Confronts the Algorithm

On 26 July 2024, the Bombay High Court delivered a watershed order in *Arijit Singh v Codible Ventures LLP & Ors.*[1261] Arijit Singh, with 138.5 million Spotify listeners, alleged that several defendants, including AI platform operators, were using Machine Learning and Real Voice Cloning tools to offer his voice as a commercial product. Users could convert any text or audio into a song performed in Singh's voice. Websites bearing his name had been

[1256] *Amarnath Sehgal v. Union of India*, 2005 (30) PTC 253 (Del. HC).
[1257] *Asha Bhosle v. Mayk Inc. & Ors.*, Interim Application No. 30382 of 2025 in Commercial IP Suit No. 30262 of 2025 (Bom. HC Oct. 2025).
[1258] Information Technology Act, 2000, India, 43A, 66, 66C and 66D.
[1259] Digital Personal Data Protection Act, 2023, India, ss 4, 7 and 8.
[1260] *K.S. Puttaswamy v Union of India* (2017) 10 SCC 1.
[1261] *Arijit Singh v. Codible Ventures LLP & Ors.*, SCC OnLine Bom 2445 (2024).

registered without authorisation. Merchandise bearing his likeness was sold on e-commerce platforms. One defendant had also uploaded a step-by-step tutorial on how to clone Arjit's voice.

Justice Riyaz Chagla, noting that the case 'shocked the conscience' of the court, granted a sweeping ex parte ad interim injunction. The court laid down a three-part test for personality rights protection: first, the plaintiff must establish celebrity status; second, the defendant's use must be of an attribute identifiable with the plaintiff; and third, the use must be for commercial gain. Applying this test, the court found that Singh's celebrity was self-evident, that his voice, vocal style, and vocal technique were unmistakably his, and that the defendants were plainly monetising that association.

The injunction explicitly extended to 'voice models, voice conversion, synthesised voices' and covered all media, physical, digital, and the Metaverse. This was India's first judgment to explicitly name and restrain AI voice conversion as a species of personality rights violation. The case further established that making an AI tool available to clone a celebrity's voice, even if the user, not the platform, generates the actual clone, constitutes infringement. The platform itself carries legal liability.

B. Asha Bhosle v Mayk Inc: Eight Decades of Voice, Zero Consent

In October 2025, the Bombay High Court granted ad-interim relief to the legendary playback singer in *Asha Bhosle v Mayk Inc & Ors.* Bhosle, a recipient of the Dadasaheb Phalke Award, the Padma Vibhushan, two National Film Awards, and two Grammy nominations, with a career spanning more than eight decades, alleged that Mayk Inc. had built a platform allowing users to make any celebrity, including Bhosle, 'sing' any song of their choice. Amazon, Flipkart, and YouTube were also named for hosting infringing merchandise and AI-generated vocal content without authorisation.

Justice Arif S. Doctor, applying the Arijit Singh test, held that Bhosle qualified unmistakably as a celebrity and that Mayk Inc.'s conduct constituted a 'brazen appropriation of the plaintiff's labour and reputation.' The court further held that AI voice cloning was analogous to creating new copyrighted works falsely attributed to the celebrity, a construction that connects the personality rights action to copyright doctrine and strengthens both claims simultaneously.

Crucially, the court held that platforms hosting AI-generated content are not absolved by intermediary safe-harbour provisions once placed on notice. Amazon, Flipkart, and YouTube were directed to remove infringing content within a week and to disclose the identity and payment details of the infringing sellers and uploaders. This platform-liability dimension of the Bhosle judgment significantly advances Indian law beyond the Arijit Singh order, which had focused primarily on the AI platforms themselves.

The Bhosle case also marks the first clear judicial invocation of Section 38B moral rights in the AI voice cloning context. The court observed that converting Bhosle's original recordings into AI-generated imitations was 'prejudicial to the honour and reputation' of the performer, a finding that connects moral rights doctrine directly to the machine-learning pipeline. This doctrinal bridge is of considerable importance: even where the copyright in a specific performance may not be directly infringed, the moral right of the performer, which is inalienable and cannot be contracted away, may still be violated by AI cloning.

C. Jubin Nautiyal v Unidentified Defendants: The Doctrine Reaches Its Latest Frontier

The most recent case in the Indian AI voice cloning trilogy is *Jubin Nautiyal v Unidentified Defendants & Ors,*[1262] In which the Delhi High Court, by Justice Tushar Rao Gedela, granted an ex parte ad interim injunction on 24 February

[1262] *Jubin Nautiyal v. Unidentified Defendants & Ors.* CS(COMM) (Del. HC Feb. 24, 2026).

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2026. Nautiyal alleged that AI platforms were using Machine Learning and generative AI tools to create audio-visual content mimicking his voice, facial expressions, and singing style. Deepfake videos morphed his face onto other bodies. Chatbots deployed his persona. Merchandise on Flipkart and Amazon falsely suggested his endorsement.

Justice Gedela held that 'Jubin Nautiyal is a well-known, popular and well-accepted personality and if the ex parte ad interim injunction and other directions are not passed, irreparable loss and injury which may not be compensated in monetary terms' would result. Significantly, the court impleaded both the Union Ministry of Electronics and Information Technology (MEITY) and the Department of Telecommunications (DoT) in the proceedings, directing them to facilitate implementation of the court's takedown orders. This is a novel procedural development: the inclusion of government ministries as implementing parties creates a direct line between judicial orders and administrative action, potentially closing the enforcement gap that has plagued earlier personality rights injunctions. The Nautiyal order also issued a John Doe (Ashok Kumar) order covering all unidentified future infringers, a forward-looking remedy that addresses the anonymous, decentralised nature of AI platform misuse.

V. THE DOCTRINAL FOUNDATIONS: BUILDING THE PYRAMID

The three AI voice cloning cases do not stand alone. They sit atop a doctrinal pyramid built over thirty years of Indian judicial creativity. Understanding this lineage is essential for appreciating both the strength and the limits of the current jurisprudence.

At the foundation is *R Rajagopal v. the State of Tamil Nadu*[1263], where the Supreme Court recognised a constitutional right to privacy that encompasses control over one's public narrative. *ICC Development International Ltd v Arvee Enterprises*[1264] crystallised personality rights as an autonomous civil cause of action in India. *DM Entertainment (P) Ltd v Baby Gift House*[1265] extended protection to the distinct vocal attributes of Daler Mehndi when reproduced in singing dolls, a pre-AI case that, remarkably, already anticipated the core question of voice-as-property.

In *Shivaji Rao Gaikwad v Varsha Productions*[1266]The Madras High Court's expansive reading of 'persona', encompassing name, image, and characteristic features, laid the groundwork for extending similar protection to voice. *Jacqueline Fernandez v Rachit Monga*[1267] established that AI-generated representations of a person without consent violate both personality rights and dignity. *Anil Kapoor v Simply Life India*[1268] was the first case to explicitly name AI-generated likenesses, including voice simulations, as actionable wrongs.

The trilogy of 2024–2026 builds on this foundation, adding the specific doctrinal tools needed for AI voice cloning: the RVC and ML technology framework, the platform liability principle, the Section 38B moral rights connection, the John Doe mechanism, and the MEITY and DoT implementation pathway.

VI. CRITICAL ANALYSIS

A. Judicial Innovation and Its Limits

The judicial contribution of Indian courts between 2024 and 2026 is genuinely impressive. These courts have moved quickly, reasoned boldly, and fashioned remedies that reach further than comparable decisions in many other jurisdictions: extending injunctions to the Metaverse, imposing takedown obligations on global platforms, impleading government ministries, and recognising AI voice conversion

[1263] R *Rajagopal v State of Tamil Nadu* (1994) 6 SCC 632.

[1264] *ICC Development International Ltd v Arvee Enterprises* (2003) 26 PTC 245 (Del. HC).

[1265] *DM Ent. (P) Ltd. v. Baby Gift House*, (2010) 44 PTC 461 (Del. HC).
[1266] *Shivaji Rao Gaikwad v. Varsha Prods.*, (2015) 3 CTC 477 (Mad. HC).
[1267] *Jacqueline Fernandez v. Rachit Monga*, CS(COMM) 390/2022 (Del. HC 2022).
[1268] *Anil Kapoor v. Simply Life India & Ors.*, CS(COMM) 652/2023 (Del. HC 2023).

platforms as directly liable for the clones their tools enable.

However, court orders are remedies for the past, not architecture for the future. They respond to known plaintiffs with the resources to litigate. They leave unprotected the thousands of lesser-known artists, regional folk singers, classical musicians, and independent artists whose voices are equally valuable and equally vulnerable. The three-part test established in Arijit Singh's celebrity status, identifiable attribute, and commercial gain is itself exclusionary: it was designed for the elite tier of popular music, not for the vast ecosystem of performers whose voices are commercially harvested without any realistic prospect of litigation.

The training data dimension remains the most significant unresolved issue. Every AI voice cloning platform requires a dataset of the target artist's voice. That data is almost invariably sourced from commercially released recordings without seeking fresh, specific consent from the performer as a data principal under the DPDPA 2023. No court has yet issued a judgment that simultaneously applies the DPDPA 2023 and personality rights doctrine to voice cloning, but such a case is, given the current litigation trajectory, only a matter of time. When it arrives, it has the potential to establish the most comprehensive framework yet for voice protection in the digital age: consent at the training stage (DPDPA), injunctive relief and damages at the deployment stage (personality rights and copyright), and criminal liability for deliberate identity fraud (IT Act 2000).

B. Countervailing Concerns: Innovation, Expression, and Over-Regulation

However, any expansion of legal protection in this domain must be approached with caution, as an overbroad regulatory response may generate unintended consequences.

While the case for strengthening legal protection against AI voice cloning is compelling, an unqualified expansion of personality rights risks generating its own set of doctrinal and policy difficulties. Any proposed regulatory framework must therefore be calibrated against competing interests in innovation, artistic freedom, and market efficiency.

First, overbroad personality rights may chill technological innovation. Artificial intelligence systems, particularly those based on machine learning, depend on large datasets to function effectively. Imposing stringent ex ante consent requirements for every identifiable vocal attribute could significantly increase transaction costs, thereby disadvantaging smaller developers and consolidating power in the hands of large technology firms capable of negotiating licensing agreements. This concern echoes the broader critique in intellectual property scholarship that excessive propertisation of information can stifle, rather than promote, creativity.

Second, the boundary between unlawful appropriation and legitimate artistic expression is inherently porous. Musical traditions, especially in India, are deeply rooted in imitation, adaptation, and stylistic borrowing. The ability to emulate the vocal style of legendary singers such as Asha Bhosle or Arijit Singh has long been part of musical pedagogy and performance culture. A legal regime that rigidly prohibits any AI-assisted imitation risks collapsing the distinction between unlawful commercial exploitation and lawful creative homage. Comparative jurisprudence, particularly from the United States in cases such as Midler v. Ford Motor Co. and Waits v. Frito-Lay, Inc., suggests that liability should turn not merely on imitation, but on false endorsement or commercial misrepresentation, thereby preserving space for expressive freedom.

Third, there are free speech and public interest considerations. AI-generated voices may be used for satire, parody, or political commentary, forms of expression that lie at the core of constitutional protection. A blanket prohibition

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on voice replication could have a disproportionate impact on such uses, raising concerns under the free speech jurisprudence that has evolved post K.S. Puttaswamy v. Union of India. Any statutory framework must therefore incorporate clear exceptions for transformative, non-commercial, and public interest uses, ensuring that personality rights do not become tools for suppressing legitimate expression.

Fourth, enforcement challenges caution against overly ambitious regulatory design. The decentralised and transnational nature of AI platforms means that even well-crafted domestic legislation may struggle to achieve practical compliance. Overly stringent rules may drive voice cloning activities to offshore or anonymous networks, undermining enforcement while imposing compliance burdens primarily on legitimate actors. The experience of intermediary regulation under the Information Technology Act 2000 demonstrates the difficulty of balancing enforcement with the preservation of an open internet.

Finally, there is a risk of entrenching celebrity privilege at the expense of the broader creative ecosystem. The current judicial framework, particularly the emphasis on celebrity status in Arijit Singh v Codible Ventures LLP, already privileges well-known artists with the resources to litigate. Expanding personality rights without careful structuring may further skew protection towards elite performers, leaving emerging or non-commercial artists comparatively under-protected while simultaneously restricting their ability to engage with existing cultural material.

In light of these concerns, the appropriate regulatory response is not maximalist prohibition but calibrated protection. The law must distinguish between commercial exploitation and expressive use, between deceptive appropriation and transformative creation, and between large-scale platform monetisation and individual artistic experimentation. Only such a nuanced approach can reconcile the legitimate interests of performers with the equally important imperatives of innovation, competition, and freedom of expression.

VII. CONCLUSION AND LEGISLATIVE RECOMMENDATIONS

The digital echo is no longer a metaphor. It has become a commercial product, sold by subscription, available to anyone with a credit card and an internet connection. Asha Bhosle's voice, refined over eight decades, has been reduced to a software feature. Arijit Singh's vocal expression is offered as a tool for anyone's creative experiment. Jubin Nautiyal's carefully cultivated place in Bollywood's sonic firmament is threatened by chatbots and deepfakes that carry his persona without carrying his consent. The law's response to this appropriation must be proportionate: not merely tinkering at the margins of copyright doctrine, but constructing a coherent, rights-affirming framework fit for the algorithmic age.

The following reforms are accordingly recommended.

First, Parliament should enact a standalone Right of Publicity Act that explicitly recognises the voice, including its timbre, vocal style, and technique, as a protectable attribute of personal identity, actionable against both direct infringers and enabling platforms.

Second, the Copyright Act 1957 should be amended to close the performer's rights gap, explicitly extending Section 38A to cover AI-generated replications of a performer's voice, not merely the reproduction of specific recorded performances.

Third, the Digital Personal Data Protection Act 2023 should be amended or supplemented by rules specifically addressing the harvesting of voice data for AI training, requiring explicit, artist-specific consent before any commercial deployment.

Fourth, MEITY should issue binding regulations, not merely advisories, requiring all AI-generated vocal content to carry clear, prominent

disclosure, consistent with the transparency obligations under the EU AI Act 2024.[1269]

Fifth, the Jubin Nautiyal case's innovation of impleading MEITY and DoT as implementing parties should be standardised: courts should routinely direct government agencies to operationalise takedown orders, bridging the gap between judicial relief and practical enforcement.

India has something that neither the United States nor the European Union possesses in quite the same form: a music industry where the human voice is the supreme artistic and commercial currency, and where the cultural stakes of voice appropriation are commensurately enormous. The law that India builds in response to AI voice cloning will not only protect its artists. It will define the relationship between human creativity and machine intelligence for decades to come. That is not merely a legal task. It is a civilisational one

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