

7, Villa du Bel Air  
75012 Paris France

Paris, 9 janvier 2012

Copyright Office  
Washington DC, USA

Dear Sir, Ms:

I am writing to add my expérience as a Professional photographer in regards the proposal to change the U.S. Copyright Law for easier access.

First of all, I am an American Citizen living in France. I have lots of photos available for licensing on several websites both in Europe and the US. One of them, Getty Images, requires us to register our images to you. The registration process although now available online, is still rather difficult, and needs to be simplified.

Here in France, their Copyright Law, or Droits d'Auteurs, are guaranteed at their création, and don't need the difficult administrative tasks that you require, and even have better guarantees for artists « Moral Rights ». The copyright laws are very strict and are heavily fined if discovered. Therefore, less likely to be infringed. It is more up to the person who used the work illegally to prove that they had in fact, used the work legally, with a written license, more than it is being up to the artist to prove that he created the work, (which is easily proven, even without formal registration). So the impetus here is not on the creator but on the user. See Attached translation from French, an extract of the French Copyright Law.

I have had many cases of copyright infringements on many of my images in the US, especially on the internet, but I find it difficult to defend myself.

My suggestion is to do away with the arduous requirement to register work with the copyright office, and to copy French legislation to protect artists.

Many of my images are used illegally on Blogs. It is very hard to find them, let alone to chase after them after the fact. Perhaps a better idea would be to charge a tax to when opening a blog, by the companies offering the blogs sites, and then to distribute the tax revenues to artists who qualify and who register each year, on a broad scale. Similar to the DACS program in the U.K. for photocopies, C.D.'s, and télévision rights. See their website here for information : [www.dacs.org.uk](http://www.dacs.org.uk)

Thank you for this chance to share my ideas with you.

With regards,

M. Tom Craig  
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