July 17, 2015

Maria Pallante

Register of Copyrights

U.S. Copyright Office

101Independence Ave. S.E.

Washington, DC 20559-6000

RE: Notice of Inquiry, Copyright Office, Library of Congress

Copyright Protection for Certain Visual Works (Docket No. 2015-01)

To Whom it May Concern:

My name is Harley Williams. I am an artist living overseas (online name; love-bumble) whose fan base primarily operates in the US. I am writing to address the problems visual artists face in the new digital environment.

1. What are the most significant challenges related to monetizing and/or licensing photographs, graphic artworks, and/or illustrations?

As a freelance illustrator, I need to maintain revenue streams in order to make a living for my family. The resale of my past images is part of my day to day way of doing business. My collection of work is a valuable resource that produces income for me and my family. Any attempt to replace the existing copyright laws with a system that would benefit internet companies would endanger my ability to make a living. Certain companies have already begun digitizing work without permission or financial compensation. Why would the government favour corporations like this instead of those of us who actually create new work?

2. What are the most significant enforcement challenges for photographers, graphic artists, and/or illustrators?

As I have previously stated, I am an artist that makes money online from clients all over the world. What I am worried about, is how these new laws will affect me. As I do not operate out of the US, if my work is used by someone within the US, which set of copyright laws will I be operating under? This is how I make my living, and I cannot afford the time to fight against people using my artwork without my permission.

3. What are the most significant registration challenges for photographers, graphic artists, and/or illustrators?

The proposal to introduce registration would become another financial burden for artists. No matter how little registries might charge in the beginning, like banks, they would soon begin to introduce charges and fees that would grow as they gain a greater and greater competitive advantage over freelance artists such as myself. Would I have to register all of my works in the US even though I do not live there? I think, in the digital age, this is not a realistic plan.

4. What are the most significant challenges or frustrations for those who wish to make legal use of photographs, graphic art works, and/or illustrations?

In my experience in using photographs for reference, asking permission and providing credit is enough, I have never had to purchase stock images.

5. What other issues or challenges should the Office be aware of regarding photographs, graphic artworks, and/or illustrations under the Copyright Act?

To prevent this unjust conflict of interest, it is imperative that no artists group that supports this legislation be allowed to receive any financial benefit from the creation of copyright registries or notice of use registries. These artists organizations have failed artists and should not be allowed to use this legislation to profit even further off the artists they were created to help.

I thank you for reading my letter and I ask you to recommend that visual art be excluded from any orphan works provisions Congress writes into the new copyright act.

Thanks,

Harley Williams (working under the name “love-bumble”)