To: Copyright Office
Re: Orphan Works

I have been watching and researching the Orphan Works proposal in an effort to define my thoughts on the issue. The June 2015 Report on Orphan Works and Mass Digitization published by the Register of Copyrights does answer many of my concerns, however it is not yet sufficient to put me at ease.

As an independent visual artist I see the process of registering my artwork with public or private registries and the cost of legal action if "Reasonable Diligence" is not adhered to a burden that I could not reasonably afford. Independent visual artists – and this is a large segment of those who will be affected by such an act – do not have access to the legal staff that large corporations and businesses do. We are at a major disadvantage because of this.

Independent artists are also at a disproportional risk because we use the internet aggressively to advertise our work which makes us also more vulnerable to those who take work from personal websites, social networking sites and on-line art gallery shows. It would not seem unlikely we could spend a disproportional amount of time dealing with infringers instead of creating our art. In other words, we are easy targets that larger entities would find simple to exploit.

Please put extreme effort into finding a more workable solution to the Orphan Works problem. Too many of the proposals available today are vulnerable to malicious interpretation and exploitation by anyone with money and a legal team.

Sincerely
Dava Dahlgran CPSA, CPX