My name is Evelynn Belmont, but that hardly matters. What does matter is that I'm exemplary of a certain freelancing type of visual artist for whom the Internet is both a home and workplace. I draw things, sometimes for money.

To respond directly to the subjects of inquiry in regards to Docket No. 2015-01, "Copyright Protection for Certain Visual Works":

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

I get paid for my work on a per-job basis. As of yet, the most significant challenge is finding clients. The rest is fairly straightforward. Some might wish to charge others for access to their work, but I find such to be rather short-sighted.

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

I've yet to have any challenges regarding enforcement of my own work, as I allow my work to be distributed freely, taking advantage of the virility of digital information in order to reach a wider audience.

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

I would say the money. Definitely the money. It doesn't help that most of copyright law is in "legalese," though.

"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?"

Likely contacting an artist and negotiating rights.

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

The majority of visual media is unregistered, and will remain unregistered under current law. Because there are so many creators and so much content, impingement is nearly inevitable.

Now let's talk about Orphan Works. As it is generally understood that visual artists have varying skills, habits, tools, and preferences toward certain aesthetics, the general consensus is that the creator of an image is also its owner, and as such, has a certain right to the image's use and distribution. An artist who publishes their work digitally through a social platform takes it on good faith that others will not take credit for their work, or use their work for profit without the creator's permission, and if it is used in such a way, a creator has grounds to take legal action against the user, whether the work was registered as copyright by the creator or not.

Orphan Works would break that model, especially for small-time creators such as myself, who may lack the means to pay their bills on time, let alone register each of their works with even a single registry. Orphan Works, as proposed in 2008 and as suggested again to Congress more recently, would wrest ownership of content from creators and hand it to whomever has the means and initiative to register the works. I imagine, if Orphan Works were to come to fruition, that businesses would spring up which actively search the internet or other public spaces for visual creations, and register the creations with the intention of selling the rights to others. Orphan Works would effectively legalize theft of unregistered visual art, and in case it's not already clear, such is against the best interest of the general populace.