July 20, 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

To whom it may concern:

My name is Dennis Parrish. I live in Lexington, Kentucky and am a published, self-employed Medical Illustrator, Board Certified through the Association of Medical Illustrators. I am also a fine artist creating portraits and figurative works in various mediums. I hold a four-year Bachelor's degree from the University of Kentucky in Lexington, Kentucky. My training there encompassed medical coursework including human gross anatomy with dissection (within the medical school) , histology, and embryology. My coursework also included advanced training in artistic techniques specific to medical/surgical illustration, visual storytelling, graphic communication and fine art.

Upon graduation in 1994, I began a sole proprietorship business as a Medical Illustrator. For the past 21 years I've been creating exhibits and anatomical and surgical illustrations for numerous surgeons, clinicians, educators, researchers , and attorneys. These artworks were used for teaching, medical presentations, journal articles, demonstrative evidence and patient education.

Beginning in 2012 I began a secondary branch of my creative work which focuses on fine art in the form of portraiture and figurative work. Not only do I plan to sell originals and artist prints of the work I create, but I have, at my choosing, shared that work by donating pieces to fundraisers, etc.

I have always worked independently. In part, because I recognized the enormous advantages past copyright laws would give to self-employed illustrators in establishing and maintaining an income stream from their work. I hope to be able to continue as such.

1. What are the most significant challenges related to monetizing and/or licensing my medical illustrations, fine art paintings, or artist prints?

As a self-employed artist/illustrator, I am dependent on maintaining revenue streams in order to earn income for my family. The resale of past images I've created is part of my day to day business and thus income. My body of work is a valuable resource which generates income for me and my family. Any app tempt to replace our existing copyright laws with a system that would benefit internet companies would severely endanger my ability to earn a living. I am confident certain individuals or businesses have already utilized digitized versions of my work without my permission or financial compensation. Why should, or would, the government favor a business like this instead of the artist who actually created the new work?

2. What are the most significant enforcement challenges for medical illustrators and fine artists?

The proposals the Copyright Office has made to Congress Page 8 are of the utmost concern to me. The proposal is basically a revised Orphan Works (OW) bill, but this one may be on steroids. The Orphan Works bills were resoundingly opposed by illustrators and artists from the first appearance some 10 years ago. A copy right bill which, at it's foundation is a variance of the Orphan Works bill, would allow internet businesses to drain the revenue from artists and illustrators with the plan to build an even better revenue business off those digitized images for themselves. There is no greater misjustice for artists and illustrators who create new works in a effort to provide economic security for themselves than to have to compete with large corporations which are getting the artwork for free from artists and then compete with artists in their own market.

My hope is that the Copyright Office and Maria Pallante will stand strong against undermining the rights of true creators and to remember the words on the Copyright.gov website about copyright:
It is a principle of American law that an author of a work may reap the fruits of his or her intellectual creativity for a limited period of time. Copyright is a form of protection provided by the laws of the United States for original works of authorship, including literary, dramatic, musical, architectural, cartographic, choreographic, pantomimic, pictorial, graphic, sculptural, and audiovisual creations. "Copyright" literally means the right to copy. The term has come to mean that body of exclusive rights granted by law to authors for protection of their work. The owner of copyright has the exclusive right to reproduce, distribute, and, in the case of certain works, publicly perform or display the work; to prepare derivative works; in the case of sound recordings, to perform the work publicly by means of a digital audio transmission; or to license others to engage in the same acts under specific terms and conditions. Copyright protection does not extend to any idea, procedure, process, slogan, principle, or discovery.

Sincerely,

Dennis Parrish, BS, CMI