

Dear Copyright Office,

I've read your proposal to raise the fees for securing proof of ownership for intellectual property. I frankly find it so disconnected from the reality faced by the vast majority of small creators of IP in America, that the service you offer will soon be unusable by the average person creating visual images.

The cost of registering material for creators of visual material, both photographers and artists, is already cost prohibitive at the present level. To now consider raising the the fees creates financial impossibilities for small creative businesses.

Artists and photographers have no way to know which of their creations will be profitable, so all must be protected. Artists have to produce hundreds of images a year, and Photographers may produce thousands. To have to register each of these separately to secure full protection of the law is impossible financially as margins on visual creative work are being squeezed tighter and tighter.

With courts devaluing the damages when a stolen image is registered as part of a collection, artists and illustrators can not afford increases in fees on individual registrations.

The copyright system provides value to more than the registrants. It provides value to our whole society. Making the registration process more expensive will not help the Copyright Office and the Library of Congress fulfill its mission "To promote the progress of science and useful arts, by securing for limited times to authors and inventors the exclusive right to their respective writings and discoveries" (U.S. Constitution, Article 1, Section 8). Increased fees will only further erode the already limited registration rates for visual arts caused by the current fees.

An author can secure a whole book of words and sentences with a single registration. A visual artist can not secure full protection for a collection of images. The courts are not helping in this regard. So you are putting us in a bind by treating each image as costing as much as a whole book for purposes of protection.

I can now find copies of my images scattered around the web for free using Google image search. But trying to find out the copyright status and ownership of an image from the Copyright Office is incredibly difficult. How can you justify the fees you want to charge compared to "free".

You need to revamp your whole operation to put the value people need from your service at the forefront. The value to the whole society is in allowing registrants to proclaim their ownership and allowing everyone to see it instantly, at a cost as close to free as you can make it. It is a physical impossibility for you to continue to collect physical copies of all the work produced. You are attempting to placing the cost of that burden on the users of the system when this is really the desire of the Congress as an expression of the desire of the Nation. So the Nation should pay this cost, not registrants.

Please leave the fees as they are now. Increased fees will destroying what you are trying to protect. Work toward using technology to the benefit the American People, and maintain the protection our images need by listening to the creators of these images when contemplating hair-brained schemes like past "Orphan Works" legislation.

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