

Dear Copyright Office,

I respectfully wish to protest the proposed registration fee increase, especially for what is the most pressed upon class of copyright holders, the average photographer. Because of the number of photographs a photographer produces, and their low income, bulk registration is a necessity and a rise in registration fee is an unfair barrier to have access to real copyright protection.

It is hard enough to impress on photographers the importance of registering their unpublished work without raising the barrier with a higher price tag. Since the majority of photographers, according to US Government figures, makes less than \$40,000 a year, a raise of the registration fee will make this an insurmountable obstacle in obtaining what is rightfully theirs, a proper registration. The Founding Fathers of this nation saw that protecting intellectual property was such a fundamental right, that it is the only "right" described in the Constitution itself, before the Bill of Rights was written.

As someone who lectures a lot to both amateur and professional photographers for 25 years, often on the subject of copyright, I can attest that over 95% of photographers do not register their work, unless there has been an infringement. At that point, as all too many find out, because of a lack of resources, they cannot pursue these infringements. This has made it almost open season for infringers to steal the work of photographers.

I fully respect the fact that administration costs for registration have gone up, but surely there must be a way to help the poorest class of copyright holders, photographers. The motion picture and music recording industry have much deeper pockets and it may be time to see if a two or more tier system can be devised and implemented in order to help photographers whose business model is taking high school senior portraits, wedding photos, and other consumer type images. A rise in registration fees is a huge financial burden that most can simply not afford. I have seen time and again how photo syndicators steal a photo from a photographer to distribute and syndicate, which in turn enriches a large corporation, at the expense of a photographer, scratching out a small income, who is effectively thrown under their corporate bus, because of a lack of a registration.

Please reconsider imposing this added burden to this class of copyright holders.

Respectfully submitted,

Jack Reznicki