

Dear Copyright Office,

I would first like to thank you for all of your help because you have been very helpful and quick to respond during the registration process for some of my registrations.

The value of what you provide is very valuable and an increase in fees, in my opinion, is justified but I think improvement for group registrations would further warrant such an increase in fees.

With the increasing abilities of cameras to take many pictures and the bandwidth of the Internet to transmit many images, improving the group registration process and system would be helpful.

I am participating in the pilot program to include contents titles on group registrations of published photos.

I would like to see an automated system that would give photographers the option to directly batch upload individual photos and to implement a system that could automatically list the contents titles for each of those individual photos that were part of a particular batch upload. Currently, I am able to only upload many photos at once if they are zipped in a folder. If a automated system was able to unzip the folder upon deposit to extract and include contents titles on the registration, that would be another way to go about it. I know that under current procedure the application is finalized before deposit so when and how to add contents titles automatically could be achieved in several ways. For instance, one could have the files for a particular registration prepared in a folder or set of folders so that the contents titles could be also "batch uploaded" or more like "batch extracted" from the set of folder(s) while preparing the application using Eco.

Flickr and other online photo services allow for batch uploading of many individual photographs. A great feature of Flickr is that it will extract the title, description and keywords from the metadata of photographs that have those metadata fields completed and automatically use that metadata to fill in the corresponding fields upon upload. This would be a very useful feature to allow photographers and registrants of other media to choose to enable when creating a registration.

I am concerned about the definition of a single work registration not covering group registrations of multiple photographs so that instead of the proposed \$45 fee, photographers that want to register numerous photographs will have to pay the \$65 fee for "All other claims". There has already been discrepancy in the courts over the validity of individual photographs qualifying for statutory damages in infringements. I am counting on you to work to solidify a process for batch registering groups of photos so that they will hold up in courts as individual works, which for me, they are. This includes, in my opinion, clarifying the procedure with legislators so that statutes and the process for registration leave little room for interpretation.

I think this would be helpful to registrants of other media that provide photographs of that media for registration, such as paintings.

That being said, although the current fee of \$35 keeps me selective in my registrations in groupings and timing, I respect and appreciate the value of the service that you provide.

To conclude, I propose having a fee of \$50 but implementing the technology, procedures and policy to smooth the process for batch uploading and group registration of photographs with an automated system to extract and list the contents titles on the application or at least off this as an option. I would also propose charging a base fee of \$50 and perhaps \$1 per page for registrations with many deposits and contents titles to cover cost of printing and mailing additional pages.

Thank you and a personal thanks to Wayne Crist to whom I am extremely grateful and to Kathryn Sukites as well.

Sincerely,

David Oppenheimer

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