

April 20, 2012

U.S. Copyright Office  
101 Independence Avenue SE  
Washington, DC 20559-6000

To Whom it Concerns:

I'm writing today to express my concern regarding the proposed adoption of new fees for the registration of claims, recordation of documents, special services, Licensing Division services, and processing of FOIA requests. In particular, the fees for registering photographic images both electronically and through paper submission.

Many photographers are still learning their way through the new electronic copyright registration system. I know a few who have just given up altogether. The proposed fee increase will only serve to further alienate photographers from registering their images.

I often register images from several photography assignments into one group registration of unpublished images per month. Due to time constraints sometimes that's simply not possible. The proposed fee increase will nearly double my cost of registration. As valuable as registering is, it's the leverage I need to take on those who infringe my images, there comes a point where the costs can appear to outweigh the benefits.

I urge you to please reconsider the proposed fee increase. Far too few photographers register their images as is. The proposed fee increase will only hasten this unfortunate trend.

I appreciate your time and consideration.

Best,



Steve Skoll