



**BEFORE THE
U.S. COPYRIGHT OFFICE**

WASHINGTON, D.C.

**REQUEST FOR ADDITIONAL COMMENTS REGARDING STUDIES
ON REMEDIES FOR SMALL COPYRIGHT CLAIMS**

**NOTICE OF INQUIRY
(OCTOBER 27, 2011)
THIRD REQUEST FOR COMMENTS
(FR Doc. 2013-04466 Filed 2-25-13)**

**ADDITIONAL COMMENTS OF THE
NATIONAL PRESS PHOTOGRAPHERS ASSOCIATION**

Submitted by:

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Introduction & Background

These additional comments are submitted on behalf of the National Press Photographers Association (NPPA) in response to the Copyright Office's February 20, 2013 Third Notice of Inquiry concerning the acute need of visual journalists for a less burdensome method of adjudicating copyright claims. Founded in 1946, the NPPA is a 501(c)(6) non-profit professional organization dedicated to the advancement of visual journalism, its creation, editing and distribution in all news media. NPPA encourages visual journalists to reflect high standards of quality and ethics in their professional performance, in their business practices and in their comportment. NPPA vigorously promotes freedom of expression in all forms. Its 7,000 members include still and television photographers, editors, students and representatives of businesses serving the visual journalism industry. The NPPA vigorously promotes the constitutional rights of journalists as well as freedom of the press in all its forms, especially as it relates to visual journalism.

Comments

NPPA has previously submitted comments to the two prior notices of inquiry. We greatly appreciate the efforts by the Copyright Office to review and assess viable alternatives to the current legal system in order to better address small copyright claims. NPPA once again asserts that a less burdensome method for adjudicating small copyright claims is sorely needed in order to better secure the rights and remedies of all copyright owners.

NPPA has been working closely with an ad hoc committee of visual arts organizations, including Graphic Artists Guild (GAG), Professional Photographers of America (PPA), Picture Archive Council of America (PACA), American Society of Media Photographers (ASMP), North American Nature Photography Association (NANPA), and American Photographic Artists (APA).

Rather than repeat previously made comments we wish to take this opportunity to endorse and support the additional comments recently filed by PACA, ASMP and GAG in response to this third request for comments.

Conclusion

We are aware the Copyright Office receives many proposals, and we greatly appreciate the opportunity to be heard. We hope these proposals will begin a constructive process to remedy this critical issue. NPPA thanks Register Pallante and Chairman Smith for this opportunity to provide our support for the additional comments made by the above-mentioned organizations regarding the need of visual content creators for a less burdensome method of adjudicating copyright claims. We look forward to working together with your Office and Congress to find a mutually acceptable solution in order to resolve this issue.

Thank you once again for your time and consideration.

Respectfully submitted,

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