

ORPHAN WORKS STUDY: SUBMISSION BY ARTISTS RIGHTS SOCIETY (ARS)

Artists Rights Society (ARS) is an organization that represents more than 50,000 visual artists in the U.S. and abroad. Included among this number are some household names, such as Pablo Picasso, Henri Matisse, Marc Chagall, Jackson Pollock, Georgia O'Keeffe, Mark Rothko and Frank Stella. (A partial list of ARS' better known members is attached hereto as Appendix A.) These however are exceptions. The vast majority of our members are not well-known, and function as small business men and women. It has been estimated that the average income of an artist in the U.S. is under \$25,000 per annum. ARS also represents the visual artist repertories of all European Union countries, as well as those of Canada, Japan, Australia, Mexico and most of South America (a list of ARS foreign sister societies is attached hereto as Exhibit B).

Adverse effect on Artists: The Disincentive to Locate The Copyright Holder

Artists would be very adversely affected by the Orphan Works bill, as it would propel many of their works into the public domain and deprive them of their right to control their own copyrights. The bill allows an infringer to reproduce a creator's work "provided he or she has performed and documented a reasonably diligent good faith search to locate the owner of the copyright." The problem here is that unless the infringer can be brought to court, at great expense to the creator, the sole decider of whether a diligent search has been made is the infringer him or herself. Alas, all too often, it will be in the interest of the infringer to *fail* to locate the copyright holder.

Contesting the Unauthorized Use

Should the copyright holder contest the infringer's unauthorized use, the only recourse is for him or her to go to court where the legislation specifically limits the financial recovery to what a reasonable buyer and a reasonable seller would have agreed to *prior* to the infringement. There is no provision for the copyright holder to *refuse* to license the work to the infringer. Nor is there any mandate for statutory damages to be applied as punishment for an illicit use. Statutory damages which can be as high as \$150,000 per infringement, though rarely applied, can serve to reduce the incidence of pirated and infringing uses by the mere threat of its application. The present bill eliminates all such statutory damages.

Exorbitant Costs of a Court Action

The costs of bringing a court action by the artist far outweigh any benefits a successful court finding would produce, as the reward for a favorable ruling is so discouragingly low. Attorneys cost hundreds of dollars an hour and court cases may drag on interminably, nor would an

attorney take such a case on a contingency basis when total damages are limited to several hundred or at most several thousand dollars. In effect, legal costs for a small business person are prohibitive, and the cost benefit analysis is such that artists would be well-advised to refrain from undertaking litigation. This of course means that the infringer is given a free hand to reproduce artistic works at will, at virtually no risk whatever. The Bill is also a very broad one. It would apply to both domestic and foreign works, both published and unpublished works and to both commercial and non-commercial uses.

There is No Business Imperative for New Legislation: If Adopted, It Would Destroy the Market for the Work of Visual Artists

ARS recognizes and honors the fair use exemptions provided by the U.S. Copyright Act. It does not impede, and in fact facilitates, the use of visual works in scholarly, press, and non-commercial educational arenas. The proposed bill, which makes no distinction between commercial and non-commercial uses, goes beyond these exemptions, as it would create a safe harbor for the most egregious exploitation of an artist's works, be it for application to coffee mugs, posters, rugs, corporate logos, advertisements, t-shirts, and boxer shorts for that matter, without the approval of or compensation to the artist, and in spite of the damage it would do to his or her reputation. It would destroy the legitimate market for the artist's work, and nullify the protections afforded by the Copyright Act. If an infringer goes to the trouble of exploiting a work of art for commercial purposes, he or she should take the trouble and courtesy of tracking down the creator, before his or her rights are ignominiously trampled upon. In brief, visual works of art should be excluded from any orphan works bill, and in the very least commercial applications ought to be prohibited.

Violation of the U.S. Copyright Law

Section 106 of the U.S. Copyright Act clearly states the owner of a copyright alone "has the exclusive rights to do and to authorize any of the following.

- (1) *To reproduce the copyright works in copies or phonograms*
- (2) *To prepare derivative works based upon the copyright works*

§ 501(a) of the same law states that "*Anyone who violates any of the exclusive rights of the copyright owner as provided by section 106 is an infringer of copyright.*"

Nowhere in the law is an infringer given the right to circumvent the copyright holder, when in the infringer's sole judgment, his "good faith search" has somewhat conveniently failed to turn up the owner.

U.S. case law makes clear that even innocent intentions are no defense to infringement. "*Intention to infringe is not essential under the (Copyright) Act.*" (*Plymouth Music Co. v. Magnus Organ Corp.*, 456 F. Supp. 676 (S.D.N.Y. 1978).

Violation of the Berne Convention

The legislation flies in the face of numerous international treaty obligations of the U.S. It violates Article 9(1) of the Berne Convention for the Protection of Literary and Artistic Works which reserves to the author the exclusive rights of authorizing the reproduction of his or her work. Our trading partners abroad would not look favorably on the negation of their artists' copyrights in the U.S. depriving foreign artists of their rights is inconsistent with U.S. treaty obligations under Berne.

Further, it fails the 3 step test of the "Certain Special Cases" exception of Berne (Article 9 (2)) since it:

1. *Does not* restrict exploitation to special cases.
2. It *does* conflict with the normal exploitation of the work.
3. It *unreasonably* prejudices the legitimate interests of the authors.

The Bill's Excessive and Unlimited Scope

The bill is an extremely broad one. It makes no distinction between a commercial and non-commercial use of an infringing work and thereby places no limitation on the most blatant commercial exploitation of an artist's oeuvre. Commercial applications should imperatively be prohibited by the Act. The bill applies to foreign as well as to U.S. works, thus depriving foreign artists of their rights without due process and inviting retaliatory measures by our trading partners, which would further harm U.S. artists. Lastly, the bill makes no evident distinction between published and unpublished work, thus potentially driving one as well as the other into the public domain.

The EU Directive

The recent EU Directive on Orphan Works (dated October 25, 2012, scheduled for adoption by member states on October 25, 2014) specifically excludes the use of orphan works by commercial entities:

*"Arrangements may be made, "under this Directive, to conclude agreements with commercial partners for the digitization and making available to the public of orphan works. **Such agreements... should not grant the commercial partner any rights to use, or control the use of, the orphan works.**" (emphasis added, S.22 of the Whereas Clause)*

Further, the obligations and rights of national collecting societies, which maintain addresses of their members, are deferred to and recognized.

"This Directive is without prejudice to the arrangements in the member states concerning the management of rights such as extended collective licenses, legal presumptions of representation

or transfer, collective management or similar arrangements or a combination of them, including for mass digitization. (S.24 of the Whereas Clause)

Article 5 of the Directive makes this clear:

“This Directive does not interfere with any arrangements concerning the management of rights at national level.”

Lastly the EU Directive does not apply to American or non EU works, unlike the proposed US Bill which draws no distinction between domestic and foreign works. The pertinent clause in the Directive is the following:

“For reasons of international comity, this Directive should apply only to works and phonograms that are first published in the territory of a member state.”

Registries: Their Huge Impracticality, and the Regrettable Return of Formalities

There is much talk about establishing commercial registries of works which may then be consulted by the infringer as a part of his or her search. Any work not found on one of these registries will be assumed to be an “orphan work.” This brings back the largely discredited days of U.S. copyright formalities which famously included the need to register a copyright as a condition of its protection. This provision had a particularly deleterious effect on foreign artists, who did not register their works and were thus deprived of their copyrights prior to the 1996 Restoration Provisions of the Copyright Act, designed to correct this inequity. It can be said as well that very few American artists managed to devote the time and resources to abide by these requirements. Reintroducing formalities in the form of registries would violate Berne, Article 5(2) which rejects all formalities. What artist would have the time, money, and clerical patience to fill out the forms necessary to register his or her work, let alone to spend time and money digitizing then? Visual artists are not like authors of books, even prolific ones, who may produce one or two books a year. If we include sketches, preparatory studies or drawings, and finished works, an artist may accumulate hundreds or works a year and thousands of works in his or her lifetime.

It would be impossible to register all of these, and even if such an effort was to be undertaken, those works which had not yet been entered in the registry would be orphaned until such time as they were, which might take many years to accomplish, and by which time great damage would be done to their creators.

There is no Need for an Orphan Works Bill. Methods already Exist for the Use of Works Without the Owner’s Approval

It is important to note that a would-be infringer already has three existing ways to reproduce a work without obtaining the copyright owner’s approval, and that adding an orphan works regime is simply not necessary. One is the Fair Use provision of the U.S. Copyright Act which allows

for reproduction in mostly educational and journalistic cases and in non-commercial settings without permission or fee.

The second occurs where an infringer in a commercial context employs a marketplace risk analysis, and decides to reproduce a work hoping the copyright holder does not come forward. If he or she does, the matter may or may not be settled for a fee or other consideration, and if the parties cannot resolve the dispute, normal court procedures are available.

Thirdly, we have seen where publishers have occasionally appended a notice to their books announcing that they have reproduced works without locating the copyright holder, but having made every effort to do so, they would be happy to make amends by inviting the owner to come forward.

All three of these methods are currently employed. They are sufficient unto themselves and certainly help to obviate the need for an orphan works bill.

Conclusions and Recommendations

In summation, the view of Artists Rights Society is the following:

- 1 The bill should be rejected in its entirety.
2. Failing this, we believe that works of visual art should be excluded from its scope.
3. The bill should not apply to foreign works of art.
4. The requirement for the establishment of registries (and thereby the reintroduction of formalities) should be eliminated.

Appendix A

THE FOLLOWING IS A LIST OF THE MORE PROMINENT ARTISTS REPRESENTED BY ARTISTS RIGHTS SOCIETY. PLEASE NOTE THAT THERE ARE MANY OTHERS. FOR MORE INFORMATION, PLEASE CHECK OUR WEB SITE AT WWW.ARSNY.COM, CALL 212-420-9160, OR FAX YOUR REQUEST TO 212-420-9286.

ACCONCI, VITO
AGAM, YAACOV
ALBERS, JOSEF (d.1976)
ALBERS, ANNI (d. 1994)
ALECHINSKY, PIERRE
ALVAREZ BRAVO, LOLA (d. 2002)
APPEL, KAREL (d. 2006)
ARCHIPENKO, ALEXANDER (d. 1964)
ARMAN
ARP, HANS (d. 1966)
ARROYO, EDUARDO
ARTSCHWAGER, RICHARD
AVERY, MILTON (d. 1965)
BACON, FRANCIS (d. 1992)
BASQUIAT, JEAN-MICHEL (d. 1988)
BECKMANN, MAX (d. 1950)
BELLMER, HANS (d. 1975)
BENTON, FLETCHER
BERARD, CHRISTIAN (d. 1949)
BERAUD, JEAN (d. 1935)
BERNARD, EMILE (d. 1941)
BERTOIA, HARRY (d. 1978)
BEUYS, JOSEPH (d. 1986)
BLAKE, PETER
BLANCHE, JACQUES-EMILE (d. 1942)
BONNARD, PIERRE (d. 1947)
BRANCUSI, CONSTANTIN (d. 1957)
BRAQUE, GEORGES (d. 1963)
BUFFET, BERNARD (d. 1999)
BURRI, ALBERTO
CALATRAVA, SANTIAGO
CALDER, ALEXANDER (d. 1976)
CAPPIELLO, LEONETTO (d. 1942)
CARRINGTON, LEONORA
CASSIERS, HENRI
CATALANO, ELIZABETH
CAULFIELD, PATRICK
CESAR (d. 1998)
CHAGALL, MARC (d. 1985)
CHAMBERLAIN, JOHN (d. 2011)
CHICAGO, JUDY
CHILLIDA, EDUARDO (d. 2002)
COCTEAU, JEAN (d. 1963)
CONDO, GEORGE
DAHL-WOLFE, LOUISE (d. 1989)
DALI, SALVADOR (d. 1989)
DAPHNIS, NASSOS
DARGER, HENRY (d. 1973)
DAVIS, GENE (d. 1985)
DEFEO, JAY (d. 1989)
DE KOONING, WILLEM (d. 1997)
DE NIRO Sr., ROBERT (d. 1993)
DE STAEL, NICOLAS (d. 1955)
DENIS, MAURICE (d. 1943)
DERAIN, ANDRE (d. 1954)
DIBBETS, JAN
DINE, JIM
DIX, OTTO (d. 1969)
DUBUFFET, JEAN (d. 1985)
DUCHAMP, MARCEL (d. 1968)
DUFY, RAOUL (d. 1953)
DUNOYER DE SEGONZAC (d. 1974)
ERNST, MAX (d. 1976)
ESCOFFERY, MICHAEL
FAUTRIER, JEAN (d. 1964)
FEININGER, LIONEL (d. 1956)
FINI, LEONOR (d. 1996)
FINSTER, HOWARD (d. 2001)
FLAVIN, DAN (d. 1996)
FONTANA, LUCIO (d. 1968)
FOUJITA (d. 1968)
FRANCIS, SAM (d. 1994)
FRANKENTHALER, HELEN (d. 2011_)
FRITSCH, KATARINA
GIACOMETTI, ALBERTO (d. 1966)
GIACOMETTI, DIEGO (d. 1985)
GLEIZES, ALBERT (d. 1953)
GONTCHAROVA, NATALIA (d. 1962)
GONZALEZ, JULIO (d. 1942)
GORKY, ARSHILE (d. 1948)
GROMAIRE, MARCEL (d. 1971)
GROOMS, RED
GUILLAUMIN, ARMAND (d. 1927)
GURSKY, ANDREAS
HAACKE, HANS
HAMILTON, RICHARD
HARTUNG, HANS (d. 1989)
HEARTFIELD, JOHN (d. 1968)
HELD, AL (d. 2005)
HELION, JEAN (d. 1987)
HERBIN, AUGUSTE (d. 1960)
HERON, PATRICK (d. 1999)
HILL, GARY
HIRAKAWA, NORITOSHI
HIRST, DAMIEN
HÖCH, HANNAH (d. 1978)
HOFMANN, HANS (d. 1966)
HOLZER, JENNY
HUEBLER, DOUGLAS (d. 1997)
HUNT, BRYAN
ICART, LOUIS (d. 1950)
IMPIGLIA, GIANCARLO
INDIANA, ROBERT
IRWIN, ROBERT
JARRET, BRUNO
JAWLENSKY, ALEXEJ VON (d. 1941)
JENSEN, ALFRED (d. 1981)
JIMÉNEZ, LUIS (d. 2006)
KAHLO, FRIDA (d. 1954)
KANDINSKY, WASSILY (d. 1944)
KAPOOR, ANISH
KISLING, MOISE (d. 1953)
KLEE, PAUL (d. 1940)
KLEIN, YVES (d. 1962)

KLINE, FRANZ (d. 1962)
 KOKOSCHKA, OSCAR (d. 1980)
 KOLLWITZ, KAETHE (d. 1945)
 KOSUTH, JOSEPH
 KRASNER, LEE (d. 1984)
 KUPKA, FRANZ (d.1957)
 LALIQUE, RENE (d.1945)
 LAM, WILFREDO (d. 1982)
 LARIONOV, MIKHAIL (d.1964)
 LAURENCIN, MARIE (d.1956)
 LAURENS, HENRI (d.1954)
 LAWRENCE, JACOB (d. 2000)
 LE CORBUSIER (d.1965)
 LEGER, FERNAND (d.1955)
 LEMPICKA, TAMARA DE (d.1980)
 LEVINE, LES
 LEWITT, SOL (d. 2007)
 LISSITZKY, EL (d. 1947)
 LONGO, ROBERT
 LOOS, ADOLF (d. 1933)
 LUCE, MAXIMILIEN (d. 1941)
 LUX, LORETTA
 MAGNELLI, ALBERTO (d. 1971)
 MAGRITTE, RENE (d. 1967)
 MAILLOL, ARISTIDE (d. 1944)
 MALLET-STEVENS, ROBERT (d. 1945)
 MAN RAY (d. 1976)
 MANGOLD, ROBERT
 MANGUIN, HENRI (d. 1949)
 MARCOUSSIS, Louis (d. 1941)
 MARDEN, BRICE
 MARIN, JOHN (d. 1953)
 MARQUET, ALBERT (d. 1947)
 MARSH, REGINALD (d. 1954)
 MASSON, ANDRE (d. 1987)
 MATISSE, HENRI (d. 1954)
 MATISSE, PIERRE (d. 1989)
 MATISSE, SOPHIE
 MATTA (d. 2002)
 MATTA-CLARK, GORDON (d. 1978)
 MAYWALD, WILLY (d. 1965)
 METZINGER, JEAN (d. 1956)
 MICHAUX, HENRI (d. 1981)
 MIES VAN DER ROHE, LUDWIG (d. 1969)
 MIRÓ, JOAN (d. 1983)
 MOHOLY-NAGY, LAZLO (d. 1946)
 MOORE, HENRY (d. 1986)
 MORI, MARIKO
 MORRIS, ROBERT
 MUNTER, GABRIELE (d. 1962)
 MUNCH, EDVARD (d. 1944)
 MURRAY, ELIZABETH
 NAGEL, PATRICK (d. 1984)
 NAUMAN, BRUCE
 NEWMAN, BARNETT (d.1 970)
 NEVELSON, LOUISE (d. 1988)
 NICHOLSON, BEN (d. 1982)
 NOVROS, DAVID
 NOGUCHI, ISAMU (d. 1988)
 O'KEEFFE, GEORGIA (d. 1986)
 OPIE, JULIAN
 OPPENHEIM, MERET (d. 1985)
 OROZCO, JOSE CLEMENTE (d. 1949)
 OUD, J.J.P. (d. 1963)
 PAOLOZZI, EDUARDO
 PICABIA, FRANCIS (d. 1953)
 PICASSO, PABLO (d. 1973)
 POLIAKOFF, SERGE (d. 1969)
 POLLOCK, JACKSON (d. 1956)
 POLKE, SIGMAR (d. 2010)
 RABINOWITCH, DAVID
 REINHARDT, AD (d.1967)
 RENGIER-PATZSCH, ALBERT (d. 1966)
 RENOIR, PIERRE-AUGUSTE (d.1919)
 (works with RICHARD GUINO (d. 1973))
 RIETVELD, GERRIT (d. 1964)
 RIVERA, DIEGO (d. 1957)
 ROCKBURNE, DOROTHEA
 ROTHENBERG, SUSAN
 ROTHKO, MARK (d. 1970)
 ROUAULT, GEORGES (d. 1958)
 RUFF, THOMAS
 RZEPKA, ADAM
 SAINT PHALLE, NIKI DE (d.2002)
 SANDER, AUGUST (d. 1964)
 SAURA, ANTONIO
 SAVILLE, JENNY
 SCHARF, KENNY
 SCHMIDT-ROTTLUFF, KARL (d. 1976)
 SCHNABEL, JULIAN
 SCHWITTERS, KURT (d. 1948)
 SEGOVIA, ANDRE
 SELIGMANN, KURT (d. 1962)
 SERRA, RICHARD
 SEVERINI, GINO (d. 1966)
 SHAPIRO, JOEL
 SICKERT, WALTER (d. 1942)
 SIMONDS, CHARLES
 SIQUEIROS, DAVID ALFARO (d. 1974)
 SMITH, TONY (d.1980)
 SONNIER, KEITH
 SOULAGES, PIERRE
 SOUTINE, CHAIM (d. 1943)
 SPENCER, STANLEY (d. 1959)
 STARN, MIKE & DOUG
 STEINBERG, SAUL (d. 1999)
 STELLA, FRANK
 STIEGLITZ, ALFRED (d. 1946)
 STOECKLIN, NIKLAUS
 TAEUBER-ARP, SOPHIE (d. 1943)
 TANGUY, YVES (d. 1955)
 TANNING, DOROTHEA
 TAPIES, ANTONI
 TENWIGGENHORN, NIC
 THERRIEN, ROBERT
 THOMAS, MICKELENE
 TINGUELY, JEAN (d. 1991)
 TOBEY, MARK (d. 1976)
 TURNBULL, WILLIAM
 VALADON, SUZANNE (d. 1938)
 VAN DONGEN, KEES (d. 1968)
 VAN VELDE, BRAM (d. 1981)
 VASARELY, VICTOR (d. 1997)
 VILLON, JACQUES (d. 1963)
 VLAMINCK, MAURICE DE (d. 1958)
 VUILLARD, EDOUARD (d. 1940)
 WACHTER, EMIL
 WALDMAN, PAUL
 WARHOL, ANDY (d. 1987)
 WEINER, LAWRENCE

WESTON, EDWARD (d. 1958)
WOLS (d.1951)
WRIGHT, FRANK LLOYD (d. 1959)
XENAKIS, CONSTANTIN
ZADKINE, OSSIP (d.1967)
ZELDIS, MALCAH
ZULOAGA, IGNACIO (d. 1945)
ZWART, PIETER (d. 1977)

Exhibit B

Foreign Artists Rights Societies Represented by ARS in the U.S.

ADAGP
11, rue Berryer
75008 Paris
FRANCE

AGADU
El Derecho de Autor es Uno de Los Derechos
Humanos
Canelones 1122
Montevideo (11.100)
URUGUAY

AKKA/LAA
A. Čaka Iela 97
Riga, LV-1011
LATVIA

APSAV
Agencia Peruana de Sociedades de Autores
Visuales
Los Frailes
181 Urb, Santa Felicia
La Moina
Lima 12
PERU
ARTEGESTION
Veintimilla E8-115 y Av. 6 de Diciembre
593.2.2547 048 Quito
ECUADOR

AUTVIS
Rua Boa Vista, 186, 4º floor,
Zip Code: 01014-000
São Paulo, SP
BRAZIL

VG BILD-KUNST
Weberstrasse 61
53113 Bonn
GERMANY

BONO
Kjeld Stubsgt. 3
0160 Oslo
NORWAY

BUS
Årstaängsvägen 5 B

117 43 Stockholm
SWEDEN
COPY-DAN
Copydan BilledKunst
Bryggervangen 8
2100 Copenhagen OE
DENMARK

CREAIMAGEN
Condell 520
Providencia
Santiago
CHILE

DACS
33 Great Sutton Street
London EC1V 0DX
ENGLAND

EAU
Toompuiestee 7
EE 0001 Tallinn
ESTONIA

GESAP
63 Kostava Street
Tbilisi 380015
GEORGIA

HUNGART
1055 Budapest Falk Miksa utca 30. fsz.2.
HUNGARY

IVARO
Irish Visual Artists Rights Organization
37 North Great Georges Street
Dublin 1
IRELAND

KUVASTO
Director Kristel Nybondas
Iso Roobertinkatu 3-5 A 22
00120 Helsinki
FINLAND

LATGA-A
J. Basanaviciaus str.4/6
2600 Vilnius

LITHUANIA

LITA

LITA, Society of Authors
Mozartova 9
P.O. Box 28
810 01 Bratislava 11
SLOVAK REPUBLIC

OSDEETE

Greek Collecting Society for Works of Visual
Arts
14 Kolletti St, Athens 10681
GREECE

PICTORIGHT

Amstelveenseweg 88-90
1075 XJ Amsterdam
THE NETHERLANDS

PROLITTERIS

Schwamendingenstrasse 10
CH-8050 Zurich
SWITZERLAND

RUSSIAN AUTHORS' SOCIETY (RAO)

6a B.Bronnaya Str., GSP-5,
123995 Moscow
RUSSIA

SABAM

Rue d'Arlon 75-77
B-1040 Bruxelles
BELGIUM

SACK

SOCIETY OF ARTIST'S COPYRIGHT OF
KOREA 5F, GNC MEDIA BLDG., 352-11
Seokyo-Dong, Mapo-Ku, Seoul
121-838 KOREA

SAVA

Viamonte 723, 4th floor
Office n° 18 (C1053ABO)
Ciudad Autónoma de Buenos Aires
ARGENTINA

SGA

Sociedade Guineense de Autores
Pessoa Colectiva de Direito Privado
Rua António M'Bana

N°2, 1° Andar, C.P. 545

Bissau
REP. GUINÉ-BISSAU

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01144 Roma
ITALY

SODRAC

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1470 Peel
Montreal, Quebec H3A 1T1
CANADA

SOMAAP

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LAS ARTES PLÁSTICAS, S.G.C. DE I.P.
Av. Mariano Escobedo # 373, 5° Piso
Col. Chapultepec Morales, México, D.F., C.P.
11570
MEXICO

SPA

Av. Duque de Loule, 31
1069 Lisboa Codex
PORTUGAL

SPDA

Duplex Giza Tower 2/12 (#301)
201204 Ginza, Chuo, Tokyo 104-0061
JAPAN

VBK

Tivoligasse 67/8
A-1120 Wien
AUSTRIA

VEGAP

GRAN VIA, 16 - 5° Dcha.
28013 Madrid
SPAIN

VISARTA

71117 str. N. Iorga nr. 21, Bucuresti
ROMANIA

VISCOPY

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Chippendale NSW 2008
AUSTRALIA