

To Whom It May Concern:

My biggest concern with allowing an image to be deemed an orphan is the lack of software controls to ensure an image is associated with a particular copyright holder. Far too many software programs strip (or simply ignore) descriptive metadata contained in the image during transfer, import or conversion processes. Unless standards are implemented that compel software developers to ensure that an image's descriptive metadata remains intact there will always be images floating around the internet with no way of knowing who holds the copyright.

This is particularly problematic as it relates to images produced by lesser known artists whose work is unfamiliar to the general public. Compounding the issue is the likelihood that these image producers may be most impacted due to a lack of resources to contest wrongful classification of their works as *Orphaned*.

Sincerely,

Chris Kane
Chris Kane Photography LLC