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July 22, 2015

Maria Pallante
Register of Copyrights
U.S. Copyright Office
101Independence Ave. S.E.
Washington, DC 20559-6000

RE: Notice of Inquiry, Copyright Office, Library of Congress
Copyright Protection for Certain Visual Works (Docket No. 2015-01)

Dear Ms. Pallante and the Copyright Office Staff:

Thank you for the opportunity to explain to the copyright office, our legislative representatives and the public the significance of the copyright protections to my work and my livelihood. I am a freelance artist specializing in aviation subjects and have been since 1976. My artwork has been commissioned by major manufacturers, individuals and the US Air Force for four decades. Original and reproduction works are in U.S. and international corporate headquarters, private collections, museums, the Pentagon and many publications.

The ownership of all copyrights of every image I have created remain in my possession with contractual specific use licensed to my clients. These agreements are based on the copyright laws that have been in effect the four decades of my professional career. These laws and contracts protect not only my ownership rights but those of my clients.

The new copyright proposals for registration of every art work I create or have created is unrealistic, unmanageable, cost prohibitive and a violation of recognized existing contracts concerning my works. The concept of the new copyright proposals to register all my artworks is as unrealistic and unconstitutional as requiring me to register every piece of clothing I own in order to establish protection to prevent others from wearing my clothing as they will.

The Copyright Office has asked the following questions. My comments address some of these concerns.

> "1. What are the most significant **challenges related to monetizing and/or licensing** photographs, graphic artworks, and/or illustrations?
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> "2. What are the most significant **enforcement challenges** for photographers, graphic artists, and/or illustrators?
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> "3. What are the most significant **registration challenges** for photographers, graphic artists, and/or illustrators?
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> "4. What are the most significant **challenges or frustrations for those who wish to make legal use** of photographs, graphic art works, and/or illustrations?
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> "5. What **other issues or challenges** should the Office be aware of regarding photographs, graphic artworks, and/or illustrations under the Copyright Act?"

Under the current copyright laws, I can explain clearly to my clients that I have legal ownership of all copyrights of my artwork and that they are purchasing only the physical original artwork or very specific license for use. There is no loophole to a potential infringer that establishment of my ownership could not be found in a registration directory. Ownership of my exclusive copyrights are also established immediately upon creation of a work, in any of its developmental phases. It would be unrealistic to protect all my works through required registration, both physically and monetarily. It is already a challenge to protect against illegitimate and illegal use with the existing legal protections. Making these protections contingent on registration would render them impossible to execute in reality.

The cost of legally defending my artworks from infringements that have occurred is beyond my financial capabilities. As an artist, I need more respected protections for the work I create, not more registration fees and paperwork. I have often found the Copyright Registration fees required to protect my works for the life of my legal copyrights to be prohibitive.

The internet and digitization of images has increased the challenges of protecting my artwork. I need legal and technical ways to protect my imagery from infringement and theft, just as much as a jeweler needs to keep valuable inventory safe from theft. Registration of each of my works is not the solution. Additionally, the confidentiality of my work frequently prohibits such registration in a bank of images. As a creative individual, this concept violates our privacy and rights of ownership.

I also agree with the more extensive comments made by Brad Holland in his letter of July 15, 2015, written and submitted to the Copyright Office in response to the Notice of Inquiry on Visual Works. Please see and recognize his comments submitted to the Copyright Office for public view and also visible at https://drive.google.com/file/d/0B6Kj_SMsTwxGZVVxRkc4M2hIbHM/view?pli=1

It is my hope that the Copyright Office and our legislators will recognize the importance of protecting visual artists' works. It is already extremely challenging to make a living in the visual arts profession. The proposed changes to copyright laws will make protection of artists' products untenable and pursuit of this profession unaffordable, undesirable and unrealistic. Our country, our society and our culture would suffer as much or more than each individual artist if our copyrights are not protected without cumbersome, invasive and expensive procedures.

Sincerely and respectfully,

Kristin Hill

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