To the Register of Copyrights of the United States of America

United States Copyright Office

101 Independence Avenue SE

Washington, DC 20559-6000

July 4, 2015

Re; Concerns regarding Changes to the Copyrights Act Relating to Orphan Works and Mass Digitization

Dear Register of Copyrights,

Thank you for reading this letter. My name is Heather Hudson, and I do business as Studio Wondercabinet. My work can be seen at www.studiowondercabinet.com. I've been a professional illustrator primarily in fantasy games since 1993. I have also illustrated natural history books for children, religious art and magazine illustration, and designed genre products like jewelry and fantasy gaming miniatures. My work has appeared in properties including Dungeons&Dragons and Magic;the Gathering. Currently I am working to build a brand based on my own original artwork and market it directly.

My income is based on selling usage rights to my artwork. I offer my customers a package of usage rights that meet their needs, and bill accordingly. My agreements state, "Any usage rights not exclusively transferred are reserved to the Illustrator." This way the customer only pays for the usages he needs, and I can reuse the images to bring in additional income. Additional income can be brought in as use by a new client, by reuse or expanded use by the original client, or by marketing it myself on products through on-line resources like Zazzle.com and Society 6.

Copyright is central to my business today and makes it possible for me to survive as an artist and illustrator. Over my career, I have seen the number and financial value of jobs in my market drop, and the number of potential illustrators rise. The internet has made it possible for customers to source artwork from anywhere in the world, frequently from illustrators willing to work at far lower rates than I can as an American citizen. Former corporate clients have gone out of business, or consolidated within a few very large companies that buy less artwork overall. Online stock-art resources make it possible to create new illustrated properties without investing in original artwork. New, foreign, and small companies have been known to find artwork in on-line portfolios and reuse it without paying usage fees to the artist.

Increasingly, survival as an illustrator depends on multiple income streams including licenses to third parities, royalties and reuse fees, and sales of creator-owned goods, either from the artist or through on-line resources. The old model of the entirely client-based illustrator no longer exists, in my observation. In order to make the multiple-income-streams model possible, I need the right to control who uses my work. If I can't control who uses my inventory of existing images, I have nothing to sell and my business will shut down.

Therefore I ask you to continue to protect artists' rights to control and profit from their work as described by current copyright law. To privilege the public at the artists' expense would be to consign to great hardship a body of American citizen-small business people who are already laboring under limited means. This is not an abstraction to the vast majority of American artist/business people. The changes described would be theft from those who are already struggling to make a living in today's changing market. Please do not reduce our situations further.

Thank you,

Heather Hudson