Sally Springer
Children's Illustrator
1510 Thumb Point Drive ~ Fort Pierce, FL 34949

July 20, 2015

Maria Pallante
Register of Copyrights
U.S. Copyright Office
101 Independence 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 invitation to comment on this subject. As a free lance illustrator, my career spans 45 years, 40 years as a member of the Society of Children's Book Writers and Illustrators. During this time, I have created a lot of drawings which have been used for advertising, marketing and children's magazines, books and products for children. These illustrations have developed over the years and are my assets and the resource for my current and future income in the many markets for illustrations. In today's world, finding a market for illustration is enough of a challenge without having to justify and defend the ownership of my own work.

Here is my response to the questions posed:

1. What are the most significant challenges related to monetizing and/or licensing photographs, graphic artworks, and/or illustrations?

A big challenge is to keep control of my images and keep my copyright notice and contact information with the work. I have already seen certain companies removing my copyright and digitizing my work without my permission or financial compensation.

Also, work-for-hire contracts, increasingly forced on artists, require the surrender of valuable digital rights to publishers in order to get an assignment.

2. What are the most significant enforcement challenges for photographers, graphic artists, and/or illustrators?

The high cost of legal fees in an infringement lawsuit is a major challenge and capability of internet companies to get artwork for free.

3. What are the most significant registration challenges for photographers, graphic artists, and/or illustrators?

There is a financial burden to register every image created and the problem of finding the time to register new images. Old images, which cannot be found to register, will fall into noncompliance and can be freely exploited by others.

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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?

There is the challenge of finding the true creator of the original work with unauthorized use and the ease of copyright removal.

5. What other issues or challenges should the Office be aware of regarding photographs, graphic artworks, and/or illustrations under the Copyright Act?

It should be illegal to remove a watermark, to remove metadata or copyright information and illegal to digitize any works not in the public domain without written permission from the creator. All registered images should be searchable by image.

Eliminate the concept of Orphaned Works. No works are orphaned, access to their creators is needed.

Sincerely,

Sally Springer