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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)

To Whom it May Concern,

My name is Anna-Maria Crum. I write and illustrate children's books. I am not famous, but I have made my living doing this for over 25 years. I have published 19 grade school readers for educational publishers and illustrated over 50 books for a variety of publishers. I am not rich. I barely scrape by. I am a member of the Society of Children's Book Writers and Illustrators and I'm on the board for the Picture Book Artists Association. I am an advocate for protecting my legal interests.

I am writing about the problems visual artists face in the new digital environment.

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

I have to have a website in order to show my work and get assignments from publishers and other clients. Unscrupulous people can take my images from my website, remove my signature or watermark in Photoshop, then resell my work as their own. I rely on my website as a major part of my advertising. I need to protect my images so that I can sell secondary rights to these images, or use them in other ways like on greeting cards or other types of merchandise from which I receive income. I work many hours to produce one image. The compensation I receive from publishers sometimes means I'm working at barely above minimum wage. These secondary areas of revenue are important sources of income that I can't afford to lose. Without copyright protections, companies can take all of my images and do what they want with them without compensating me. Changes like that would prevent me from earning a living in my profession.

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

The proposals the Copyright office has presented to Congress are basically the Orphan Works bill only super-sized. I opposed these changes back in 2008 and I am even more opposed to this new version. People and companies want to change the copyright law so that they can make money off of our work. I have fought all my life against the prejudice that because I create art I'm not really working. What I do is fun so I shouldn't really get paid like someone who actually works for a living. I have put in all-nighters to meet a deadline that was arbitrarily changed on me. I pay for my own health insurance. If I'm sick, no one pays me to take a day off. And no one pays me for two weeks of vacation every year. I often work weekends to bring in enough money to pay bills. My typical workweek is 50 hours. These changes would make it impossible for me to continue in this profession. Even now, if someone steals one of my illustrations to sell there is little I can do to stop them. I can send them an email to tell them to stop, but beyond that, there's not much. I can't afford a lawyer who would make them stop. Companies know this. These proposed changes would give them the legal right to steal my work and there is nothing I could do to stop them from exploiting me except to quit making my art.

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

The proposed changes would require me to register every illustration I've ever created, and for a picture book we're talking 32 pages of illustrations—times that by over 50 books. And that doesn't include all of the cards, murals, spot illustrations, wildlife park signs, paintings, and t-shirt images I've done. I would have to register each image with two for-profit registration companies. Even if the fee is small, it would be financially impossible to protect even half of my work.

4. *What are the most significant registration challenges or frustrations for those who wish to make legal use of photographs, graphic art works, and/or illustrations?*

I make use of photographs for reference material. I never copy an image. When I want to use an image, such as in a book cover, I pay a licensing fee to use it in a commercial way. That's what companies should do if they want to use my images.

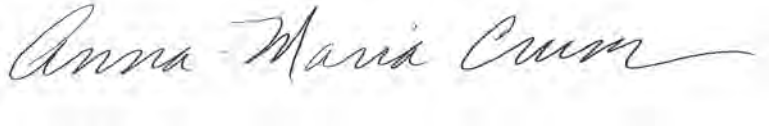
5. *What other issues or challenges should the Office be aware of regarding photographs, graphic art works, and/or illustrations under the Copyright Act?*

The people who are behind these changes want to unfairly profit from other peoples' work. Besides wanting to sell images they find on the Internet, they also want to funnel reprographic fees into their coffers instead of these fees flowing to the artists. Many countries, like Canada, collect fees from copy centers and then share that money with the people who created the work and own the copyrights. We need to do that here. Isn't America about protecting the rights of the individual? The constitution protects our intellectual property rights. Don't take these rights away.

Please do not put through any version of the Orphan Works bill that would strip rights from the people who created the work. Please do present a bill that would give artists their share of reprographic rights as proposed by Congressman Jerrold Nadler's American Royalties Too (ART) Act of 2015.

Thank you.

Sincerely,



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