Carolyn R. Holmes, MS, CMI, FAMI
Certified Medical Illustrator

July 4, 2015

U.S. Copyright Office
Re: Copyright Protection for Visual Artists

Dear Copyright Office,

I strongly oppose the Orphaned works changes proposed in the Notice of Inquiry on Copyright Protection for Certain Visual Works. I am a Certified Medical Illustrator trained at the Medical College of Georgia. I have a successful free-lance business with clients in Georgia, Massachusetts, and New York. I register my artwork with the Copyright office because it is my property and has significant resale value. This is a time-consuming and expensive process but it is worth it so that I retain the reproduction rights for my work. ***Re-use of my work is more than half its value***. Many of my clients are not-for-profit organizations and institutions, and many find my illustrations on the internet. Both areas of commerce are endangered by the proposed copyright modifications.

These changes would literally put me out of business because people could simply take my artwork, remove my name from the image and call the work Orphaned, even if I have registered the work with the Copyright office. Why create accurate medical illustrations if someone else could freely take my work, remove my name, claim they looked for a creator but were not successful, modify my picture and resell it as their own? **I would have to charge about four times the price for these illustrations to recoup the lost secondary use fees. Obviously with my own illustrations available for free/theft on-line, no one would pay the increased fees. My business would fail.**

Please oppose these changes and support the ability of illustrators to operate successful independent small businesses in our country.

Respectfully,

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Certified Medical Illustrator

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