I am concerned with the proposed revisions to copyright law. Specifically, I have concerns regarding the manner in which works must be registered in order to not be considered "orphaned", and in how entities can copyright "derivative" works of orphaned works.

If you plan to require all copyrighted works to be registered or else be considered "orphaned", it is *essential* that this registration be both easy and free. Many creative works are created by people with limited resources, and if they seek to make money by providing their works to others, then the erection of artificial barriers to their attaining copyrights risks driving them away, leaving the world bereft of their creativity.

Even more serious is the concern that unregistered family photos or other private works could fall into the "orphaned" category, so that if they fall into the hands of others, the creator has no control over them, even when others start using them for profit. This strikes me as seriously wrong.

The ability of others to profit from "derivative" works if the original creator didn't have the means to register them just compounds the problems with the registration system. The lack of clear terms on what constitutes a "good faith" effort to contact the creator opens the way for drawn out legal haggling that most content creators cannot afford to engage them. If these rules go through, many existing content creators could find themselves undercut by people they can't afford to challenge. And when they stop creating because it is unaffordable, the world would be lesser for it.