I am writing to you as VP of Technology for LunaGraphica Inc, a Silicon Valley web design and development firm.

I am very opposed to the proposed changes to copyright law which would allow the use of "orphan works."

We regularly design images and websites for ourselves and our clients, and deploy them on the Internet, safe in the knowledge that they are protected by US and international copyright law.

Having to register each individual work with a government or third party site, or to monitor a site to determine if someone intended to use our work, would have a direct financial impact on our bottom line.

The changes to the law are completely unnecessary! If someone cannot identify the author of a work, there is a vast body or content that CAN be used, either through Creative Commons licensing or commercial licensing. Furthermore, fair use allows even work by unknown authors to be used in many cases.

There is no reason to weaken the rights of creative professionals and businesses.

Regards,

Bob Nicholson
VP of Technology
LunaGraphica Inc.