July 19, 2015

Maria Pallaenta
Register of Copyrights
U.S. Copyright Office
101 Independence Ave. S.E.
Washington, D.C. 20559-6000

RE: Notice of Inquiry, Copyright Office, Library of Congress
Copyright Protection for Certain Visual Works (Docket No. 2015-01)

To Whom This May Concern,

My name is Alex Wolf. I am a freelance artist that creates artwork as their source of income. I am writing to address 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 works, and/or illustrations?**

   As a freelance artist, I need to maintain any and all revenue in order to make a living for myself and my spouse. My collection of work is a valuable resource that produces income for me and my spouse, though it is not much. Any attempt to replace our existing copyright laws with a system that would benefit internet companies (or anyone else for that matter) would endanger my ability to make a living. Why would the government favor corporations that take someone else's work without their permission and allow them to monetize it instead of those of us who actually create new work?

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

   The proposals the Copyright Office has made to Congress concern me. It is more or less a revised Orphan Works bill, but would be worse than before. Orphan Works bills have been resoundingly oppressed by artists like myself since they first appeared a decade ago. A copyright law built on the foundation of orphan works law would allow internet companies to syphon revenue from artists with the hopes of creating an even better revenue stream for themselves. There cannot be any bigger challenge for those of us who make our living creating new works than having to compete with giant corporations that can get artwork free from artists and compete with us for our own markets.

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

   The proposal to reintroduce registration would be another financial burden for artists. No matter how little registries might charge early on, they would soon begin to introduce charges and fees that would grow as they gain a greater and greater competitive edge over freelance artists such as myself. Anyone who says this won't happen is not living in the real world. If the government succeeds in passing this legislation, the end result will be that artists like myself will find ourselves paying through the nose to maintain our images in someone else's for-profit registries. As for images we cannot afford to register, will fall into noncompliance and a lifetime of images created at great expense and effort will be free to be exploited by others.

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?**

   In my work, I make fair use of photographs and other graphic artworks for reference, but that is about all.

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

   It is imperative that no artists group that supports this legislation be allowed to receive any financial benefit from the creation of copyright registries or notice of use registries. These artist organizations have failed artists and should not be allowed to use this legislation to profit even further off the artists they were created to help.

6. **What are the most significant challenges artists would face if these new copyright proposals became law?**

   If the proposals became law, every artist would have to pay to protect every single artwork they have created to date. For many, that is hundreds, if not thousands, of individual artworks they have to pay to protect. Most artists *cannot* afford to do this, by any means. This includes myself, as well as artists that I know and speak to. Passing these proposals would do severely more harm than good.

I thank you for reading my letter and I ask you to recommend that visual art be excluded from any orphan works provisions Congress writes into the new copyright act.

Thank you,
Alex Wolf