Specifically regarding the US Copyrights Office and Orphan Works proceedings, I genuinely understand that all ideas and points of view need to be heard, that this is part of our Democracy.

I ask the US Copyright Office to consider my thoughts at this time……..

I have benefited from the protection that the US Copyright office has provided as a service and I thank you for that.

As a seasoned proffesional creative of some fifty plus years two of the biggest challenges have been protecting and getting compensated for my work.

My work is in museum collections and has been copied and imitated endlessly, flattering on one hand but defending my property has been time consuming, costly and frustrating on the other. I would rather spend time in my studio than defending my property rights in a court of law.

I have spent many small fortunes on filing patents and registering copyrights over the years and too many fortunes defending them. This has worked moderately well at best, Orphan works will undermine everything I have done and will continue to do.

Copyright is the basis on which I do business. Infringing on my work prevents me from earning an income and is no different to stealing from me,

All creatives who do business in the USA would be rendered increasingly vulnerable to copyright infringement most would not be able to afford litigation proceedings which is a huge consideration. If you can't pay you can't play ?

Please consider, if *You* had not spent but invested *Your* entire life developing techniques endlessly cultivating looks and styles and someone then decides they are not only going to take the fruits of *Your* labour and make money without *Your* consent and it is then incumbent upon *You* to prosecute for damages regardless of your financial capabilities.

Orphan works would be a giveaway of my intellectual property by the US Copyright office, the same office that I pay to protect my rights.

Orphan works would be the Copyright Office bowing to industry pirates who create

nothing but money for themselves to line their own pockets at little expense and no hard work by using others creative work freely.

Orhan works works against the interest of any creative and subsequently against the interest of the all creatives and subsequently our society and culture turning it into a free for all as long as you can pay to stay in the game.

Orphan works promotes property theft, I cannot imagine that the Copyright office would become the facilitator when it is your role to protect and uphold copyright laws as they are.

Orphan works is essentially industry trolls that we have sitting at our table trying negotiate ownership…..there is a fox in the hen house.

The registration of metadata at increased cost, both time and money, to the artist is nothing short of a SCAM, a means for collecting monies at the expense of creatives that will do little if anything to protect individuals rights from copyright violators.

Instead of making creatives pay, the US Copyright office would do well to focus its efforts on upholding and facilitating prosecution of copyright violators.

I do not wish for anyone to be able to monetize my work without my permission or consent. This is tantamount to THEFT
I do not wish "the Next Great Copyright Act" to replace all existing copyright law.
I do not want to loose the Constitutional right to the exclusive control of my work.
I do not care to be pressured to register my work with comerical registries.
I do not wish to make my work available for commercial infringement by " good faith" infringers.
I absolutely do not allow my artwork be altered and copyrighted in anyone else's name.

If the Copyright office is to serve any purpose for creatives it must simply be to improve the nature of protection of the artist / creative and not the interests of industry pirates.

The new Copyright Act, Orphan works is truly an outrageously poor idea, I respectfully demand that the US Copyright Office put an end to these talks NOW.

I thank you for reading my concerns and I am sure the concerns of many

independent creatives who have contacted you.

Most Sincerely, Richard Holloway