July 20, 2015

Maria Pallante
Register of Copyrights
U.S. Copyright Office
101Independence Ave. S.E.
Washington, DC 20559-6000

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

To Whom it May Concern:

My name is Nate Lovett. I am a Columbus Ohio based artist and illustrator. Since 2007 I have produced and published hundreds of illustrations for many comics, children's books, board games and other publications

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 artworks, and/or illustrations?**

As a freelance illustrator, I need to maintain revenue streams in order to make a living for my family. The resale of my past images is part of my day to day way of doing business. My collection of work is a valuable resource that produces income for me and my family. Any attempt to replace our existing copyright laws with a system that would benefit internet companies would endanger my ability to make a living. I have already found companies, and individuals who have already begun digitizing my work without my permission or financial compensation. Why would the government favor corporations like this 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 very proposals the Copyright Office has made to Congress concern me. It is essentially a revised Orphan Works (OW) bill, but would be even worse. Orphan Works bills have been resoundingly opposed by artists since they first appeared a decade ago. A copyright law built on the foundation of orphan works law would allow internet companies to syphon off revenue from artists with the hopes of creating an even better revenue stream for themselves. You may as well just empty my bank account, and force me into a "real" job, because at least then I won't be creating anything to be legally stolen.

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

The proposal to reintroduce registration would become another financial burden for artists. No matter how little registries might charge in the beginning, like banks, they would soon begin to introduce charges and fees that would grow as they gain a greater and greater competitive advantage over freelance artists such as myself. Anyone who says this won't happen is not living in the real world. In the end, 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 somebody else's for profit registries. As for the images we can't afford to register, or those we can't find the time to register, or those we can't find decades old metadata to register will all 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?**

The kind of system the Copyright Office has proposed to Congress seems all too familiar to me. Corporations already have unprecedented power in this country as it is, we don’t need to let the power grab continue while stepping on the little guy, by letting them accrue our art into their own for profit databases, while we struggle to afford to register them ourselves.

Thanks,

Nate Lovett