Maria Pallante, Register of Copyrights
US Copyright Office
101 Independence 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)

Dear Ms. Pallante and Copyright Office Staff:

As a professional artist, I feel compelled to make the follow comment to the Copyright Office.

There will be serious damage to the livelihoods of visual creators in this country, if the proposed Orphan Works legislation is implemented.

1- Promises were made to American artists and international artists when the US joined the Berne Convention in 1976; this resulted in life choices made by many Americans, from then to now, to pursue a visual arts career as their livelihood.

2- The devaluation of market value of all these careerists' existing works, and for all works to come, will be the result due to the immediate wide-spread ability to take, with little financial risk, any images an infringer would want, and even profit from it themselves, all promoted by those seeking immediate, short-term gains only.

Many artists and illustrators, and small businesses who relied upon the promises made by the government when it joined the Berne Convention in 1976, made business decisions to invest their work lives in the creation of exploitable assets and vigorously maintained their property rights throughout their careers. Many

made this choice decades ago, and many others have continued to do the same through generations since, all based on the incentives the Treaty created with its inherent protections that afforded ample opportunities to profit and build security from this business decision.

While many wish to use the products of artists without impediment, they too will eventually have difficulty protecting their own ill-gotten works. We will have come full circle with no one profiting except **corporate employees**, (and their external lackies who benefit tangentially), **whose agenda is the fastest, most immediate gain and benefit within their own circles of influence**, not the long-term building of sustainable economies and the stability and growth of a self-reliant citizenry that is not a burden on society, but creators of progress and benefits to the whole.

Particularly impacted in the area of being left vulnerable in society are:

Mid-life careerists who made the decision to invest fully in a visual arts path, will be hard hit by the lack of ability to protect their rights which are the bedrock of their relationship with clients and all future opportunities. The devaluation of visual art will undercut current pricing, and render careers solidly in the making for two decades or more, with drops in rates that should be now climbing from reputation, and work carefully honed to provide market value through years of experience, trial and error in all future contracts. Leaving this careerist — at middle age when securing new employment, in potentially even a different field is difficult at best — vulnerable to finish raising their families, and/or stabilize security for their own later years. Some twenty to 30 plus years of collective assets in their copyrighted works will be left with diminished value, little protection, and the business decision to rely on the government's promises of protection and incentive, rendered worthless.

Long-time careerists nearing the latter stages of their careers investing and profiting from the incentives to date, may now lose the current true market value of their assets — a full career's inventory of rights-maintained works — at a time they planned to thoroughly capitalize on its collective value. Many are relying on its value to provide a degree of security to their families in the form of inheritable assets that would continue to produce value for the 70 years after their demise.

Additional impacts:

Beginning careerists and new artists just leaving school or currently in school, having either had parents who paid education, or are themselves carrying heavy school loans, invested in training and education, major decisions, based on the existing promise of the ability to earn a reasonable income through the incentives and protections in the current law. This leaves them with the additional burdens of getting further education, taking further loans, or time out of an earning position, to reposition themselves as independent self-reliant members of society.

Educators and institutions invested in teaching visual art will find enrollment seriously diminished, with layoffs of personnel, both teaching and supporting. And without education in the arts, craft will be lost over time, an important part of any culture that promotes progress in the world. The impact of this loss will spread wide in too many areas to note here.

Thank you for the opportunity to express these thoughts.

Sincerely,

Glenda Rogers Stocco
Independent Illustrator and Artist

Associations:
Founding Member of the Illustrators Partnership of America (IPA)
Previous Director of Communications for the IPA.