To: US Copyright Office
Re: Proposed Copyright Reforms 2015

My name is James E. Lyle, a cartoonist and illustrator living and working on the outskirts of a small town in the mountains of North Carolina. I was educated in art at the small (but well-rated) Southwestern Community College, located near the home I grew up in. I was an honor student while attending SCC, a member of Phi Theta Kappa, and graduatied at the head of my class. For the past 30+ years I have worked primarily as a freelance artist creating artwork for numerous clients world-wide, in spite of my arguably humble surroundings.

I have been honored to be accepted as a member of the National Cartoonists Society since 2007 and have been further honored by election by my fellow members to serve as an officer of the Southeast Chapter of the National Cartoonists Society (serving two terms as Vice-Chairman and presently serving my second term as Chairman). I am also an ordained ruling elder of the Presbyterian Church in America and serve as Clerk of Session for Covenant Presbyterian Church of Waynesville, NC.

In spite of these many honors and a busy schedule of freelance clients the household income that my wife and I share is less than that of most public school teachers. In twenty-seven years of marriage we have not been able to purchase a home of our own. The cars we have been able to purchase were made possible by personal loans from parents (now all deceased), and frankly, we live a spare but generally happy existence—in spite of the usual difficulties.

As you may imagine, this means I am constantly looking for new and better ways to exploit my abilities to augment, even slightly, our income. So if artwork that I have previously created may catch the eye of the public I'm more than willing to attempt to market it in various forms. I often review old artwork that was created 20 or more years ago to see if it might fit some current trend or need.

You see, in my line of work a client may only be interested in a single image to ultimately purchase and publish, but many hours of work may be spent by me creating sample images to entice that client into hiring me to create their custom work in the first place. The time and expense of registering all these works with the copyright office is simply too prohibitive to consider.

Yet for years (since the previous copyright reforms) I have been functioning under the promise that it was not necessary for me to register works with the copyright office; that supposedly merely having placed the work in "fixed form" was considered enough to secure my rights without even placing the copyright symbol on the work.

(For the record, I have generally placed the copyright symbol on

created works in order to discourage those who might assume the work was in public domain without such markings. But as to the practice of registering works and paying the registration fees, I simply cannot afford to take part in that unless I have a pending challenge to my copyright ownership.)

Now I understand that certain parties are claiming that my artwork is "virtually worthless" once it has been published. Well, that's a matter of opinion I suppose. For a multi-billion dollar internet server / media corporation, my ability to resell an image I drew for an independent comic book that is now printed on a tee-shirt priced at $10 may be "virtually" worthless--but to me it's the difference between putting gas in the car or eating on the way home from an out-of-town trade show.

These parties should know better. For years the industry standards (I refer to the Graphic Artists Guild Guidelines) have stated that re-publication of artwork requires an increased fee--not a reduced one. And while some may consider a few hundred dollars a pointless amount of money to even bother with--a mere nuisance--it's how I keep our electric bill paid in the winter, and yes--even how I can afford to pay for the internet service (owned by some of those same companies) that I now use to deliver the artwork to clients. That is, clients who are willing to pay for the purchase of copyrights.

In short, I consider these proposed "copyright reforms" nothing but attempted robbery on the part of those petitioning for unregistered works, like my own, to be considered "orphaned works". If these corporations don't want to pay for my work, that's their business, but to try to steal it and at the same time call it a public service is both crooked and insulting.

Please do not proceed with the proposed "copyright reforms"--keep copyrights in the hands of the creators of those works and allow creators to decide what rights to sell, whom to sell them to, and at what price they are to be sold.

Yours,

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