July 18, 2015

Sean Guzman
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 Sean Guzman. I am a freelance Illustrator/Sophomore student, currently attending the Academy of Art University. I am currently putting 40+ hours a week in my craft and am diligent in this pursuit for my career.

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 student in college, I will need to have a way to support myself with my craft, for myself and family. The current Copyright Law protects the right I have to my work and ability to support myself. Replacing this current law with systems that benefit internet companies would seriously affect my ability to make a living as an artist. Please note that many artists who have large bodies of successful work would not be able to logically copyright there work under the new copyright law. It would lead to the artist paying substantial amounts of money, some in the tens of thousands, or more; and in many cases many years to get all their work copyrighted.

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

The new proposal that the Copyright Office has made is similar to the original Orphan Works bill (OW), though potentially worse. This bill was, and is, a backbreaker to artists, and so has, is, and will be completely opposed by artists. This bill would allow internet companies to deplete revenue from artists to thereby revenue for themselves.

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

As I touched on before, the proposal to reintroduce registration would become another financial burden for artists. Even when the charges are minimal in the beginning, they would soon introduce charges that would grow as they gain a greater and greater competitive advantage over freelance artists. In the end, artists will have to pay large amounts to maintain their own hard work. For the

images that the artist cannot afford to register, or the ones the artist does not find time to register, or those we can't find decades old metadata to register will all fall into noncompliance. These images that we put many hours into would be taken by others to be exploited upon.

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?

All my work makes fair use of photographs and other graphic artworks for reference.

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

Many artists have seen their foreign reprographics royalties taken away for years. I fear this is the same thing that would happen with the proposals the Copyright Office has made to Congress. This should and needs to be prevented. It is important that any artist group that supports this new copyright be allowed to receive benefit from the making of copyright registries or notice of them.

Thank you for reading my letter.

Sean Guzman