

From: [REDACTED]
To: [FN-OMB-IntellectualProperty](#)
Subject: Group Registration of Published Works
Date: Wednesday, March 24, 2010 12:55:19 PM

Dear Ms. Espinel:

I am an attorney who has represented approximately 500 professional cartoonists, illustrators, and writers over the last thirteen years. I am also a professional cartoonist with over 1,500 published cartoons. I request a simplification of the copyright registration process for groups of published works.

My clients and I create a stream of cartoons, illustrations and stories that are sent out to many different publishers. My clients often sell their work for less than \$200 per cartoon, and have no idea what date it's actually published or any other details required in the current copyright forms (title of publication, volume, page number, tear sheets, etc.). We are faced with a time-consuming, costly, and in some cases, practically impossible process for registering our works. Therefore, I request that you:

(1) allow cartoonists, illustrators and writers to group register a year of published works on a form similar to the form used for photographers (Form GR/PPh/CON), and

(2) only require the year of publication if the specific date of publication is not known.

Under the current regulations, many works go unregistered because my clients do not have all of the information necessary to register their published works. Practically speaking, copyrights must be registered in order for the government to protect them. So, my recommendations are a natural fit for your mandate.

I am available for any further questions or assistance.

Sincerely,

/s/ Stu Rees, Esq.
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