



**BEFORE THE
U.S. COPYRIGHT OFFICE**

Copyright Office Fees

Docket No. 2026-2

COMMENTS OF THE COPYRIGHT ALLIANCE

The Copyright Alliance appreciates the opportunity to submit the following comments in response to the [notice of proposed rulemaking](#) (“NPRM”) published by the U.S. Copyright Office in the Federal Register on March 20, 2026, regarding the Copyright Office’s proposed adoption of a new fee schedule for its services.

The Copyright Alliance is a non-profit, non-partisan public interest and educational organization representing the copyright interests of over 2 million individual creators and over 15,000 organizations in the United States, across the spectrum of copyright disciplines. The Copyright Alliance is dedicated to advocating policies that promote and preserve the value of copyright, and to protecting the rights of creators and innovators. The individual creators and organizations that we represent rely on copyright law to protect their creativity, hard work, and investments in the creation and distribution of copyrighted works for the public to enjoy.

While all our members share a common interest in strong copyright protection, the work of the Copyright Office, and the need for a modern, efficient, and affordable copyright registration system, they are not a monolithic group. Our membership is comprised of a diverse group of individual creators and small to large businesses who face differing sets of challenges, interests, timelines, financial, and other considerations arising from particular registration needs related to the specific circumstances under which they create and disseminate their creative works. Particularly in the digital age, and now in the age of generative artificial intelligence (AI) technologies, these challenges have only multiplied.

Many individual creators and small businesses (hereinafter referred to as “professional creators”) continue to find it challenging to register their works as they typically lack the time, expertise, and financial resources to register their works. These challenges are particularly pronounced for high-volume and prolific creators such as photographers and other visual artists. Owners of large portfolios of copyrighted works likewise struggle with unique set of difficulties and costs associated with registering these portfolios and the individual works contained therein, regardless of their resources. Challenges and hurdles to the copyright registration system are especially pronounced (i) for prolific professional creators and large corporate copyright owners who own large portfolios of copyrighted works as they face compounded difficulties due to having to pay the increased fees multiple of times and deal with the hurdles of the registration process at scale; and (ii) when the works registered are time-sensitive and dynamic, such as news media publishers’ websites.

As a result, many copyright owners, especially professional creators, must be extremely selective in deciding what to register, how to register, and when to register their works. In many cases, these constraints result in copyright owners registering fewer works than they would optimally like to register, or in the case of many professional creators, not registering their works at all. While the proposed copyright registration fee increases would adversely affect the bottom-lines of all creators and copyright owners who make use of the system, professional creators in particular stand to suffer the greatest harm from the steep increases proposed in the NPRM.

We understand and appreciate that it has been several years since the Copyright Office has adjusted its fees and that it will need to do so from time to time. Therefore, we do not oppose Copyright Office fee adjustments periodically in principle. However, at this point in time, we cannot support the fee increases as proposed in the NPRM—43% on average¹— particularly those increases that far exceed this average, including, but not limited to, the 40% increase for the group registration option for updates to non-photographic databases, the 55% increase in the group registration options for photographs, and the 268% increase in the group registration option for updates to news websites (“GRNW”).²

Of all the fee increases, we highlight our significant concerns with the 268% increase in GRNW fees for news media publishers. This fee increase is exorbitantly high, and it imposes a significant barrier to the Fourth Estate availing themselves of this critical registration option so that they may fully protect and enforce their Constitutional rights in a world of unprecedented technological challenges. A fee hike of this magnitude runs counter to the Copyright Office’s mission in this fee study³ and raises the question of whether the Office is meeting Section 708’s mandate that fees “be fair and equitable and give due consideration to the objectives of the copyright system.”⁴

We also oppose the Copyright Office’s proposal to eliminate the Single Application registration option. Our concerns about the proposals made by the Copyright Office in this fee study arise from the absence of a more comprehensive consideration of key factors that have not been fully included in the analysis and discussion in the Cost Assessment Report (“FRD Report”) prepared by the Library of Congress’ Federal Research Division’s (“FRD”) and consideration of certain efficiencies and cost savings hoped to be brought about by operational and IT modernization, all of which we discuss in more detail in the comments below.

¹ Notice of Proposed Rulemaking: Copyright Office Fees, 91 Fed. Reg. 13533 (Mar. 20, 2026) [hereinafter “NPRM”].

² *See Id.* at 13535.

³ *Id.* at 13531-32.

⁴ *See* 17 U.S.C. §708(b)(4).

Because copyright registration is voluntary (as copyright protection is automatic), raising fees at a rate beyond what would be justified by inflation should be the option of last resort.⁵ It's essential that the Office exercise caution and exhaust all alternative means for balancing its budget—for example, through appropriations and by reducing costs, improving efficiencies, and offering additional services or business options—before increasing registration fees, as any additional costs or barriers serve as a disincentive to robust participation in the copyright system, including, most importantly, the registration system. Until these factors are fully considered and built into the cost assessment and fee increase analysis, and until modernization to the registration IT system has been implemented, the U.S. Copyright Office should delay proposing and implementing any fee increases and should continue to provide the Single Application registration option.

I. THE FRD REPORT LACKS CRITICAL DATA POINTS AND ANALYSIS NECESSARY FOR CONSTRUCTIVE STAKEHOLDER FEEDBACK

While we have some issues with the NPRM, most of our concerns with the proposed fee schedule stem from what we perceive as a deficient FRD Report that the Office was compelled to rely on to make the fee schedule decisions outlined in the NPRM. Much of our criticism of the FRD Report is based on critical pieces of missing data and analysis.

As we outline in more detail below, there are key pieces of data and considerations that are missing and important questions stemming from the FRD Report which are necessary to fully incorporate into the fee study before the Copyright Office adjusts fees and so that stakeholders can provide the Copyright Office more accurate and constructive comments on this fee study.⁶ We urge

⁵ The Copyright Office indicates it used the median CPI to calculate inflation to be at 23% since fees were last updated, whereas the average rate of the increase in proposed fees is 43%. *See* NPRM, *supra* note 1 at 13531, 13533.

⁶ To this point, the FRD Report and NPRM lacks discussion on retrospectively examining the effects of the 2020 fee increases on registration demand and whether prior fee studies had accurately predicted costs, demand, and revenue. Without this retrospective examination it raises serious questions about whether the methodology employed in the FRD Report continues to build on flawed assumptions and whether there could be improvements made to the cost assessment analyses.

the FRD Report to be reworked with the following considerations in mind and then for the Office to issue a new NPRM based on improved cost assessment analysis.

A. Discussion of Reducing Costs

Both the FRD Report and the NPRM fail to include any discussion about potential ways that the Office can reduce costs. We note in these comments some areas where examination costs may be reduced by better educating registration applicants and providing more guidance and help built in the registration form itself (which we understand will be included in registration applications filed through ECS).⁷ As copyright registration is optional, the copyright registration examination should be more ministerial in nature rather than be a rigorous review of eligibility akin to examination of other forms of intellectual property like patents or trademarks.⁸ Changes and solutions to making the registration examination process more efficient so that it comports with this ministerial nature should be achievable and relatively inexpensive to implement—and can result in cost reductions for the Copyright Office.

We, therefore, urge the Copyright Office to more closely examine its registration examination processes— or perhaps hire an outside consultant to advise on how the registration process, from filing to examination to grant of the certificate, can be simplified and even automated to reduce the Office’s costs. For example, we question why higher GS-levels are required for certain deposit processing and why there is no discussion in the FRD Report or the NPRM of reducing those

⁷ See LIBRARY OF CONGRESS, Copyright Public Modernization Committee Meeting February 2026 (February 25, 2026), <https://www.loc.gov/item/video-11705/> [hereinafter “CPMC Meeting”].

⁸ The copyright registration examination processes in the U.S. seem to be more extensive than the registration examination processes undertaken in the majority of other Berne Convention signatory countries. Of the 63% of Berne Convention signatory nations who have copyright registration systems, most of them (about 74%) have either no registration examination process or do not conduct substantive reviews of the copyrightability of the work being registered. See DR. STEF VAN GOMPEL & DR. SAULE MASSALINE, SURVEY ON VOLUNTARY COPYRIGHT REGISTRATION SYSTEMS: FINAL REPORT, WORLD INTELLECTUAL PROPERTY ORGANIZATION, 27 (Apr. 23, 2021), https://www.wipo.int/edocs/mdocs/mdocs/en/wipo_crr_ge_2_21/wipo_crr_ge_2_21_report.pdf; see also *id.* at 27-29, nn.107-115. Particularly in light of the fact that only U.S. authors and copyright owners must register their works to receive registration benefits, the Copyright Office should identify whether there are undue registration hurdles and burdens within the examination processes and if so, determine how the Copyright Office can reduce those hurdles and burdens to achieve greater cost efficiencies.

levels as a way to contain costs. Ultimately, maybe addressing the higher GS-level examination issue does not significantly reduce costs, but there is no way to know that because the FRD Report fails to address it.

We also question why there is no discussion about the use of ethically developed AI-assistive technologies to streamline the registration intake and examination processes as a means to reduce costs in ways that do not materially reduce quality. Other agencies are considering certain uses of AI-assistive technologies, but we do not see any evidence in the FRD Report that such technologies are being considered as a way to assist with the copyright examination process. Perhaps employment of ethically developed AI-assistive technologies to streamline the registration process is being considered by the Copyright Office, but the FRD Report is devoid of any such discussion and how such use might be used to reduce expenses.

We believe that IT modernization and the new ECS system in particular have the potential to greatly relieve cost burdens on the Office. However, the FRD Report contains no discussion of how the modernized ECS system, implementation of certain components of registration modernization, or lowering barriers to registration by updating regulations can reduce costs.⁹ We are on record as supporting the Copyright Office receiving additional appropriations and other resources to expedite its registration modernization efforts as we believe that IT modernization is key to relieving cost burdens on the Office.¹⁰

⁹ The Visual Artists Copyright Reform Act is an example of modernization legislation which would provide much needed reforms to the copyright registration system to lessen the burden and hurdles of registration for visual artists such as photographers and graphic artists and the barriers they face in the registration process particularly as these professional creators are prolific creators who work under tight timelines. *See* Visual Artists Copyright Reform Act of 2025, S.3517, 119th Congress (2025). Additionally for GRNW, we believe that amending regulatory language so that news media publishers can register websites that are not limited to a specific subject matter would remove unnecessary barriers to registration benefits for a large portion of news media publishers and reduces the Copyright Office's costs in exercising judgment over whether particular news content qualifies as certain subject matter that is appropriate for registration. appreciate that some of these complexities are being eliminated and addressed in the Copyright Office's IT modernization process, and stress that this underscores the reason why fee increases should be delayed as cost efficiencies are already in development that will positively impact the registration system.

¹⁰ *See generally* *The U.S. Copyright Office: Customers, Communities, and Modernization Efforts*, Before the Comm. on House Admin. 118th Cong. (2024), (statement of Keith Kupferschmid, Chief Executive Officer, Copyright

We understand that the ECS system may not be launched until the end of 2028, which would fall within the typical time period that the proposed new fee schedule may go into effect. That means professional creators and copyright owners would be paying for registration fees that have built in costs associated with eCO which is being phased out, when these costs would be reduced by ECS in less than two years. In short, ECS efficiencies should be considered and accounted for now.

We strongly believe that ECS will improve efficiencies and lower costs. Increasing fees now will prematurely drive away professional creators and copyright owners from the registration system, perhaps altogether—at a time when their works are increasingly and systemically used by AI developers without authorization. This makes registration and copyright protection more important than ever, yet professional creators and copyright owners continue face significant hurdles to the registration system which may be intensified by increased fees. In light of decreasing participation in the registration system by copyright owners, the Copyright Office should keep in mind the mandate from Section 708(b)(4) of whether the deterrent effects of the fee hikes will result in turning professional creators and copyright owners away from the copyright system such that they will not be willing to even try the ECS registration system when it is ready.

B. Price Elasticity

Unlike the Booz Allen Hamilton 2017 Fee Study Report (“Booz Allen Report”)¹¹ and the U.S. Copyright Office 2017 Fee Study Model,¹² the FRD Report and the NPRM both fail to discuss in detail or analyze elasticity and the projected effects of the proposed fee hikes on registration demand. Perhaps the information exists, but it is not clear if it does or whether the assumptions are based on unsupported generalizations. The NPRM cursorily mentions elasticity in the context of

Alliance), <https://copyrightalliance.org/wp-content/uploads/2024/06/Copyright-Alliance-Testimony-on-USCO-Modernization-for-HAC-Final-June-24-2024.pdf>.

¹¹ BOOZ ALLEN HAMILTON, FEE STUDY REP. 8–9 (2017), https://www.copyright.gov/rulemaking/feestudy2018/fee_study_report.pdf.

¹² U.S. COPYRIGHT OFFICE, FEE STUDY MODEL 3 (2017), https://www.copyright.gov/rulemaking/feestudy2018/fee_study_model_summary.pdf.

inelastic demand for some registration options and a few non-registration related services—but there is no supporting data in the FRD Report.¹³

Understanding elasticity and having data to back up elasticity assumptions are vital to understanding how the Copyright Office arrived at its proposed fee hikes and whether these proposed fees would reduce participation in the copyright registration system that would undermine the Copyright Office’s consideration of whether the fees are “equitable and give due consideration to the objectives of the copyright system.”¹⁴ We know that professional creators and copyright owners are price-sensitive¹⁵ and thus demand elasticity will very likely have increased across the board over the years. This means that the Copyright Office’s quest to increase cost recovery would not outweigh the harms that would be done to the copyright registration system because the fee increases will heavily burden and discourage creators and copyright owners from registering their works.

We heard significant concerns about a few specific proposed fee increases that would discourage registration. In particular, we heard from professional creators, especially high-volume creators like photographers, that the over 50% fee increase for most group registration options would dissuade them from registering their works. The 40% increase in the group registration option of updates to non-photographic databases will also negatively impact Multiple Listing Services (MLSs) around the country who use this option to register their real estate listing databases. This group of copyright owners have been registering about 10-15% fewer registrations after bearing the brunt of a shocking 488% increase in registration fees from the last fee increase.¹⁶

¹³ See NPRM, *supra* note 1 at 13534-35, 38.

¹⁴ 17 U.S.C. §708(b)(4).

¹⁵ See *infra* Section II.B.

¹⁶ See National Association of Realtors, Comment Submitted in Response to the U.S. Copyright Office’s March 20, 2026 Notice of Proposed Rulemaking on Copyright Office Fees (May 4, 2026) [hereinafter “NAR Comments”].

We also heard that the 268% increase in fees for news publishers to register updates to news website would have an adverse impact on registration, especially considering the economic challenges facing far too many publishers and the spread of news deserts across America. We are concerned that the proposed fee increase would cause local publishers to avoid registration in the first place. Likewise, graphic artists, illustrators, and two-dimensional work professional creators face a 53% price hike in a new group registration option for two-dimensional artworks (“GR2D”) that was made available only three months ago.¹⁷ These are only a few examples of the range of professional creators and copyright owners who would be adversely affected by the proposed fee hikes. It is vital that price sensitivity and elasticity is factored into cost assessment analysis and fee hike proposals in light of Section 708(b)(4)’s mandate.

C. Transparency of Certain Factors Utilized in Cost Calculations

We appreciate that the FRD Report contains detailed cost data related to the registration of specific kinds of works rather than simply lumping the cost analyses of all copyrighted works according to the type of registration option utilized (Single Application, Standard Application, and Group Registrations). We believe this will be very helpful in providing thoughts and feedback on the Copyright Office’s ongoing Notice of Inquiry about Alternative Fee Structures. However, the data used to calculate certain costs for specific registration options is missing from the FRD Report. For example, the FRD states that the total costs of the group registration option for unpublished photographs are different from the total costs of the group registration option for published photographs by about \$40-\$50 with no explanation to account for those differences—despite the fact that photographs are being registered and examined in both instances.¹⁸ Without knowing what accounts for these kinds of differences, the Copyright Office is unable to make informed decisions and stakeholders provide meaningful feedback and suggestions.

¹⁷ Final Rule on Group Registration of Two–Dimensional Artwork, 90 Fed. Reg. 59384 (Dec. 19, 2025).

¹⁸ LIBRARY OF CONGRESS FEDERAL RESEARCH DIVISION, U.S. COPYRIGHT OFFICE FY2024 FEE STUDY: COST ASSESSMENT REPORT 21 (2024), <https://www.copyright.gov/rulemaking/feestudy2026/Cost%20Assessment%20Report.pdf> [hereinafter “FRD Report”].

Additionally, while there is a breakdown of costs associated with the various registration options, there is little information and no in-depth analysis as to why certain works have higher costs associated with their registration. The FRD Report alludes to a few factors that may explain some of these differences including employing deposit intake personnel at a higher GS level for motion picture deposits than for other kinds of deposits.¹⁹ But the reasons for employing personnel at a higher GS level for intake of certain deposits is also not made clear in the FRD Report. If these factors are being used to calculate costs, which in turn are used as a basis to propose fee hikes, it is necessary that stakeholders fully understand them.

D. The Value Provided by Creators and Copyright Owners Who Register Their Works Must be Factored into the Cost Assessments

Copyright registration is a cornerstone of the entire copyright system, since without registration the recordation and public records systems would cease to exist or yield a poor record of information at best. The tremendous value that creators and copyright owners continue to provide to those other systems and the Library of Congress must be factored into cost assessments. In particular, we highlight that “the registration system . . . serves as a major source of the Library’s acquisitions”²⁰ as creators and copyright owners add tremendous value to the Library of Congress’ collections through the deposit system. That value contributed by professional creators and copyright owners to the Library of Congress via the deposit system is \$57.3 million. It is critical that this kind of value generated by participation of creators and copyright also be captured and factored into cost assessments that are being used to determine registration fee changes. This is not a novel factor to consider for the Copyright Office’s fee study. In fact, we strongly urge the Office to do so as Congress apparently also historically considered the value contributed by the copyright system to the Library when statutorily setting Copyright Office fees before the fee-setting duties

¹⁹ *Id.* at 19.

²⁰ Brief for the United States as Amicus Curiae Supporting Vacatur and Remand at 4, *Reed Elsevier, Inc. v. Muchnick*, 559 U.S. 154 (2010) (No. 08-103) at 4.

were handed over to the Copyright Office after 1997.²¹ By failing to factor such value into cost assessments in this fee study effectively results in inappropriate subsidization of public systems by professional creators and copyright owners.

E. Calculation of Overhead and Indirect Costs

The FRD Report takes a novel approach by incorporating overhead and indirect costs that have traditionally not been included in cost assessment calculations for the Copyright Office’s fee study. It is not clear why “non-personnel costs under appropriated and fee-related fund codes not associated with IT modernization,” the licensing division, or the Copyright Royalty Board (CRB) were assigned to the general overhead pool.²² To the extent funds have already been appropriated and paid for in relation to general Copyright Office expenses, they should not have been factored into calculating overhead costs as this artificially inflates costs for this fee study.

Our concern here also extends to the FRD Report including divisions like the Office of the General Counsel, including the Copyright Claims Board (CCB), and Public Information Education (PIE) division into calculating indirect and overhead costs and inflating those costs.²³ The Copyright Office has historically explicitly excluded such divisions from cost calculations and from costs associated with the mandatory deposit program, as well as programs dedicated to providing general education and information to the public—particularly as these divisions service far more than registration-related functions of the Copyright Office.²⁴ It is not appropriate that the

²¹ See Final Rule: Copyright Office Fees, 85 Fed. Reg. 9374, n.3 (Feb. 19, 2020).

²² FRD Report, *supra* note 18 at 37-38.

²³ *Id.* at 37.

²⁴ See Karyn A Temple, Register of Copyrights, Proposed Schedule and Analysis of Copyright Fees to Go into Effect in Spring 2020, 11 (2019), <https://www.copyright.gov/rulemaking/feestudy2018/proposed-fee-schedule.pdf>; see also Marybeth Peters, Register of Copyrights, Proposed Schedule and Analysis of Copyright Fees to Go into Effect on or about April 1, 2014 (2013), <https://www.copyright.gov/docs/newfees/USCOFeeStudy-Nov13.pdf> (“But as in earlier studies, this most recent study continued to exclude costs associated with the policy and international programs, the mandatory deposit program, and programs dedicated to providing general education and information to the public.”);

FRD Report's cost assessments broadly include these factors in calculating costs that were then roughly proportioned among fee-bearing customers of registration services and then used to justify fee increases. This is evident in the fact that in the 2018 fee study for every dollar in direct costs related to the registration options, there was an average of \$1.14 in indirect costs (excluding IT modernization) and \$1.34 in indirect costs (including IT modernization costs).²⁵ In 2026, that ratio balloons by *five-fold* to an average of \$5.41 in indirect costs for every dollar in direct costs.²⁶

Additionally, by virtue of including all sorts of divisions and costs into the indirect overhead costs, it is not clear if users of the registration system are effectively subsidizing any Library of Congress related functions including mandatory deposit processes. Again, the Library already gets a benefit of \$57.3 million from deposits of works from professional creators and copyright owners.²⁷ That is \$57.3 million that the Library does not have to spend on works for its collections. It is unclear if and to what extent that contribution is calculated into the fee analysis. If it is included, then this needs to be calculated as revenue to offset such overhead as noted above.

We understand and appreciate that the FRD Report explains the methodology of attempting to associate, as best as possible, specific services from non-registration divisions to registration-related processes, including reconsiderations of registration denials. And we do note that the FRD Report explicitly omits some services of \$3,281,135 for PII removal services, reconsideration requests and expected employee time from the Materials Control and Analysis Division processing

Marybeth Peters, Register of Copyrights, Analysis and Proposed Copyright Fee Adjustments to Go into Effect on or about August 1, 2009 (2009), <https://www.copyright.gov/reports/fees2009.pdf> (The study omitted public information costs and certain costs associated with legislative, regulatory, judicial, and international responsibilities that do not relate directly to any fee service. The study also omitted activities, including those involved in processing incoming deposits not associated with registration and securing copies of copyrighted works published in the United States that were not registered or voluntarily deposited for the use of the Library of Congress. Overhead expenses associated with omitted activities were likewise excluded.)

²⁵ See News Media Alliance, Comment Submitted in Response to the U.S. Copyright Office's March 20, 2026 Notice of Proposed Rulemaking on Copyright Office Fees (May 4, 2026).

²⁶ *Id.*

²⁷ NPRM, *supra* note 1 at 13532.

physical submissions.²⁸ But it is unclear to us whether the FRD Report also appropriately omits other costs that should not be included in the indirect overhead costs.

As in our response to the 2018 Fee Study and its corresponding report, we again caution against including costs from other divisions and the Library as this could artificially inflate the costs of registration, running counter to the Office’s authority under Section 708.²⁹ The cost assessment report should re-calculate the costs using only those costs that fall within its authority under Section 708, and lower the fees accordingly. Copyright registration applicants should not bear costs in the form of fee hikes for already-funded aspects of the Copyright Office and the Library of Congress and of aspects unrelated to the copyright registration system. At best, it is not entirely clear to us that this was fully taken into consideration for this fee study and in the FRD Report. It is imperative that cost assessments be recalculated to eliminate overbroad cross-subsidization and the inclusion of costs that have been historically left out of Copyright Office’s fee studies.

F. Distribution of IT Modernization Costs

We are concerned with how the FRD Report factors in IT modernization costs into the cost assessment and distributes these costs exclusively across the registration and recordation divisions, with no further discussion. Modernization costs should come from appropriations and the appropriated funds for modernization should be excluded from the cost assessment analysis. It is unclear how much of IT modernization expenses in the FRD Report are considered to be fee funded versus funded by appropriations, which is vital for stakeholders to understand in the context of proposed fee increases. It would be useful for there to be an accounting for both to date

²⁸ FRD Report, *supra* note 18 at 15.

²⁹ Copyright Alliance, Comment in Response to the U.S. Copyright Office’s Notice of Proposed Rulemaking on Copyright Office Fees (Sep. 21, 2018), <https://copyrightalliance.org/wp-content/uploads/2020/04/Copyright-Alliance-USCO-Fee-Schedule-Comments.pdf> [hereinafter “Copyright Alliance 2018 Comments”]. See 17 U.S.C. § 708(b)(1) (“The Register shall conduct a study of the costs incurred by the Copyright Office for the registration of claims, the recordation of documents, and the provision of services...”). Additionally, other divisions related to the Library of Congress should not be factored into cost analyses that affect registration costs as professional creators and copyright owners already contribute \$53.7 million worth of creative works to the Library through the deposit system.

and going forward, so that stakeholders can appropriately assist the Copyright Office's efforts to secure additional appropriations for critical and overdue registration updates.

Moreover, *modernization of the registration system earnestly began only a year or two ago and the bulk of IT modernization has benefitted other parts of the copyright administrative system.*

Why are the bulk of these costs being allotted to registration applicants when registration modernization has only just begun? Users of the registration system have not been the main beneficiaries of ongoing modernization efforts that have been rolled out in the past few years. It is not appropriate for the FRD Report to allocate the large proportion of those costs to users of the registration system merely based on the assumption that this is appropriate because copyright registration is the largest component of the Copyright Office's services.

G. Other Questions and Concerns About Methodology

First, it is not clear why the Copyright Office's 60% cost recovery goal must remain the standard, other than it is a historical one for the Copyright Office. It is not required by statute and, to the best of our knowledge, Congress has not set such a cost recovery threshold for the Copyright Office. Given rising costs and lessening participation in the registration system,³⁰ there is an argument to focus more on continue serving the objectives of the Copyright Act rather than solely on cost recovery.³¹

Second, the FRD Report acknowledges severe gaps and limitations in the methodology in conducting cost assessments for Copyright Office services, including a mere four-week data collection period of time-use data to project the Office's costs for a whole year (which is used to base fee proposals that will affect copyright registrants for *years*) and the use of qualitative interviews and surveys, which can be plagued by considerable bias, inconsistencies, inaccurate

³⁰ See *infra* n.33.

³¹ See 17 U.S.C. § 708(b)(4).

data filled by estimates, reliability, and other issues, as substitutes for empirical quantitative data.³² Just acknowledging flaws in methodology is not enough—the FRD Report should have accounted for these flaws, found corrective measures, or found solutions to counter the negative effects this could have on the cost assessment analysis. The consequence is that these gaps and limitations serve as the bases upon which fee increases are proposed. Ultimately, it is the professional creators and copyright owners who are bearing the brunt of the shortcomings of the FRD’s incomplete and limited analysis. It is simply unacceptable for cost recovery analyses and fee increases to be based on these significant limitations and poor extrapolations that are acknowledged in the FRD Report itself without any attempt to address or correct those issues.

Third, the FRD Report applies inflation uniformly across dissimilar cost categories that can experience different inflation trajectories including technology costs that could decrease per unit and federal wages which increase at controlled rates whilst accounting for volatile inflation periods particularly in recent years following the 2020 pandemic. Inflation should not be a blunt instrument in inflating cost assessments that are used to justify fee increases.

II. INCREASING REGISTRATION FEES WILL RESULT IN FURTHER DECLINE OF COPYRIGHT REGISTRATIONS

The Copyright Office is proposing large registration fee increases at a time when the value of copyright registration to professional creators continues to decrease significantly, as evidenced by the significant number of creators who do not register their works. In a Copyright Alliance survey of over 500 creators of all types, 44% reported that they have not filed a copyright registration application with the U.S. Copyright Office within the last 5 years.³³ The number one reason these creators provided for their decision not to register remains that “it’s too expensive.”³⁴

³² FRD Report, *supra* note 18 at 42.

³³ COPYRIGHT ALLIANCE, COPYRIGHT REGISTRATION FEE SURVEY (2026) [hereinafter “Copyright Alliance Survey”].

³⁴ Of those creators who reported having not filed a copyright registration application with the U.S. Copyright Office within the last five years, 40% said that they have not done so because “it’s too expensive.” For this question, respondents were permitted to select as many responses as applicable. See *id.*

The trend in decreasing participation in the registration system is supported by Copyright Office data. Since 2019 there has been a significant decline in the number of copyright registrations. The biggest decline was in 2020 during the pandemic when the Copyright Office processed only 367,307 registrations, after which the numbers have not reached pre-pandemic levels with the Office most recently issuing 415,780 registrations in 2025.³⁵ This represents a 24% decrease in registrations. This decrease is not discussed in the FRD Report.

Importantly, nor does the FRD Report evaluate the 2020 fee increase and whether elasticity predictions made during the 2018 study was accurate, and if not, why not. With the dramatic drop in registrations since the last fee study and associated fee increase, there is a good chance that such elasticity predictions in that study were incorrect. If that is the case, then using those elasticity predictions as a basis for increases in the fee schedule proposed in the NPRM would be compounding that problem and lead to even more reductions in registrations over the coming years.

³⁵ U.S. COPYRIGHT OFFICE, ANNUAL REPORT FY 2025 at 16, <https://www.copyright.gov/reports/annual/2025/ar2025.pdf>. In 2019, the Copyright Office issued 547,837 registrations which significantly decreased to 367,307 registrations in 2020 (a drop of 24%). *See id.* This figure has not bounced back to its pre-pandemic levels, as the Copyright Office reported issuing 415,780 registrations in 2025. *See id.* It would be more accurate to compare the number of registration applications filed with the Copyright Office. However, we do not have such numbers. Nevertheless, because the Copyright Office’s refusal rate is very low at around three percent, our analysis is unlikely to fluctuate so much as to detract from the point that participation in the copyright registration system is declining.

Year	Copyright Registrations
2019	547,837
2020	367,307
2021	403,593
2022	484,589
2023	441,526
2024	424,155
2025	415,780

In the absence of contrary data in the FRD Report, increasing fees now would likely exacerbate the decline in registrations (and applications filed).³⁶ As we explained above, this is why it is critical for the FRD Report to further analyze and discuss key factors like elasticity of copyright registration and to employ other methods that may allay cost issues so that the Copyright Office can ensure that it meets its obligations under Section 708(b)(4) that fees are set to “be fair and equitable and give due consideration to the objectives of the copyright system.” More should be done to prevent this decline, rather than simply accepting it as a necessary consequence of adequately funding the Office and viewing fee hikes as the best solution for the Office’s cost recovery concerns.

A. More Than Ever Creators Are Questioning Whether Copyright Registration Provides Sufficient Value

For many professional creators who have either never registered their works with the Copyright Office or have had to stop or decrease the number of registration applications they file, the perception is that copyright registration does not provide enough value for the time and expense it requires. The top benefits of registering a work that survey respondents cited is the ability to enforce the copyright in federal court against infringers, to prove that a work belongs to them, and to recover statutory damages and attorneys’ fees.³⁷ But there are high costs associated with litigating in federal court. Likewise, many of the other benefits associated with registration, like the availability of statutory damages and the presumption of validity, lack value to professional creators who are unable to enforce their rights in court in the first place. The inability to even

³⁶ While modernization and other improvements might be made to the registration system to attract more registration applicants, at that point it may be too late because once creators opt not to file, it becomes more difficult to get them back in the future.

³⁷ In the Copyright Alliance survey, of the 56% of creators who reported having filed a copyright registration application with the U.S. Copyright Office within the last five years, 69% said they register their work “So that I can sue if infringement occurs.” Copyright Alliance Survey, *supra* note 33. The top two answers were “To prove that the work belongs to me” (78%) and “To be eligible for statutory damages and attorneys’ fees” (70%). *Id.* For this question, respondents were permitted to select as many responses as applied. Of those creators who reported not having filed a copyright registration application with the U.S. Copyright Office within the last 5 years, 23% said that they have not done so because “It’s not worth it since I can’t afford to sue for infringement anyway.” *Id.* This was the third most popular answer choice, behind “It’s too expensive.” (40%) and “It’s too complicated or confusing” (31%). *Id.* For this question, respondents were permitted to select as many responses as applied.

access a courthouse, under a system where *virtually all of the incentives for registration are tied to litigation*, largely nullifies the value of copyright registration to those creators. Moreover, concerning language in the Copyright Office’s Compendium where the Office takes the position that statutory damages for registrations of a compilation or collective work is limited to that work alone further compounds these problems.³⁸ Though the Copyright Claims Board (CCB) now exists as a small-claims court alternative that is a more affordable and accessible for professional creators, they do not view the existence of the CCB as reason enough to register works.³⁹ Therefore, we think it’s important for the Copyright Office to consider other potential incentives that could be added to the system that could drive registration applications since the existing registration incentives are insufficient for a vast amount of professional creators.

The troubling trend of declining registrations should signal to the Copyright Office that fees should not be raised without parallel meaningful efforts to better incentivize participation in the registration process through new ways, including by proposing new and additional registration benefits, modernizing the registration system, implementing appropriate alternative fee structures, conducting helpful education program for unsuccessful registrants, and introducing efficiencies to processing automated tasks for AI technologies to reduce labor costs. The Office can work towards better cost recovery while ensuring robust participation in the copyright registration system.

B. Given Creators and Copyright Owners Perceive a Lack of Value in Registering, Increasing Fees Will Exacerbate the Decline in Copyright Registrations

Based on responses to the Copyright Alliance’s survey and experiences with past fee increases, it is evident that creators and copyright owners will be further discouraged from registering their works due to the proposed fee increases. For most professional creators, the proposed fee increase is simply too steep for them to afford to continue registering the same volume of works and at the same frequency going forward. Of those creators who reported having filed a copyright

³⁸ See U.S. COPYRIGHT OFFICE, COMPENDIUM OF U.S. COPYRIGHT OFFICE PRACTICES (3d ed. 2021) § 1008.7.

³⁹ See Copyright Alliance Survey, *supra* note 33. Being able to file infringement claims in the CCB was the sixth top registration benefit according to survey respondents at 55%.

registration application within the last five years, 6% of respondents indicated that any increase would lead them to stop registering altogether, 34% of respondents indicated that *any* increase in fees would lead them to file fewer registrations with 14% responding that an increase in fees of more than \$5 is the most they could tolerate before they stop registering their works altogether, 11% responding that a \$6-\$10 increase in would lead them to file fewer registrations, and 12% responding that a \$11-\$20 increase in would lead them to file fewer registrations. Accordingly, because the Office proposes raising the fee for a standard application by \$20 (an increase of 31%), once the new fee schedule goes into effect at least 77% of these respondents would file fewer registrations. As for those creators who have not filed within the last five years, 40% said that they have not done so because the current fees are already too expensive.

C. Group Registration Applicants Are Especially Affected by Proposed Fee Hikes

The Copyright Office proposes a general increase of 53% across the board for most group registration applications, which it notes is the second highest volume of services that the Office provides.⁴⁰ Particularly for professional creators and copyright owners who are prolific creators, the proposed increase would further disincentivize them from registering their works, which runs counter to Section 708(b)(4)'s requirement that fees “be fair and equitable and give due consideration to the objectives of the copyright system.”

The Copyright Office justifies the fee increases for group registration options by highlighting the impact of the proposed increases on a cost per work basis. For example, the Copyright Office notes that the cost per photograph would rise by a few cents in the case of the “more modest increase” in fees for both group registration options for photographs.⁴¹ However, as we previously pointed out in our 2018 fee study comments in the context of the 750-limit on works that can be registered in a group registration for photographs, “it is misleading to discuss the fee . . . on a cost-per-photograph basis because the likelihood that more than a few of those 750 photographs will

⁴⁰ NPRM, *supra* note 1 at 13534.

⁴¹ *Id.* at 13534.

ever truly benefit from the registration is exceptionally low. However, because it's impossible to predict which photographs might acquire value over time or be infringed, a prudent photographer will register as many photos as they can afford in the hopes of securing those additional benefits for the one or two photographs in the batch that might one day avail themselves of those benefits. Practically speaking, for the average photographer, the entire [\$85] of the proposed fee would go toward securing additional benefits for no more than a few of those 750 photographs. It is therefore inaccurate to attempt justify the fee increase by spreading the cost across all 750 photographs.”⁴²

Similar reasoning applies for other group registration options, where the limit of works that can be registered in one group application is much lower and the fee increases are much higher (from \$85-\$130) such as the Group Registration for Two-Dimensional Artwork (“GR2D”) at twenty works and the Group Registration for Unpublished Works (“GRUW”) at ten works. We are hopeful that this situation will be improved by the fact that the modernized registration system under the upcoming ECS will enable registration applicants to upload and register more works than the current system allows and that the registration process will be efficient both for applicants and the Office. But until those limits can be increased, our concerns are not quelled by a cost-per-work argument.

Moreover, for newer group registration options like GR2D and GRNW, the proposed fee increases will only serve to deter applicants from participating in those options. In the case of the GR2D in particular, this could result in faulty and incomplete data and knowledge of whether and how these registration options are truly working for their intended customers. The 268% proposed fee increase for GRNW is disproportionately high with little discussion or analysis to justify such an exorbitant fee hike, and singles out news media publishers in a way that raises question over whether this proposal effectively constitutes a tax on the press.⁴³ In the rulemaking process for both of these registration options, the Copyright Office had agreed to revisit stakeholders’

⁴² Copyright Alliance 2018 Comments, *supra* note 29 at 9.

⁴³ *See generally* *Minneapolis Star v. Minnesota Comm'r*, 460 U.S. 575 (1983).

suggestions to modify these group registration options based on how the system works over the next few years.⁴⁴ But the Office will not be able to draw on meaningful data to make beneficial improvements if these systems are underutilized by virtue of a drastic fee hike introduced so soon after these group registration options became operational.

Finally, the Copyright Office notes in the NPRM that the more substantial proposed fee increases for certain group registration options are based on the assumption that these “options primarily serve corporate applicants.”⁴⁵ This generalization seems to assume that a registration applicant with a corporate or business name is also not likely to be a small business, a one-person shop, or any other sized company whose business and revenues may be more sensitive and less insulated from the proposed increase in fees. This is especially relevant in the context of the 40% increase in group registration of updates to non-photographic databases and the 268% increase in fees for the group registration option for updates to news websites, where the NPRM notes that because these registrants are corporate applicants, they are not as sensitive to the fee hike.⁴⁶ This is simply not true. Especially considering the fundamental business challenges faced by far too many news media publishers, resulting in the spread of news deserts across the country, it is inappropriate to assume that all publishers are large corporations able to absorb unexpected cost increases. Additionally, the characterization of a cost-absorbent, centralized, conglomerate-type corporate entity does not accurately reflect Multiple Listing Services (“MLS”) who utilize the group

⁴⁴ See Final Rule on Group Registration of Two- Dimensional Artwork, 90 Fed. Reg. at 59384 (Dec. 19, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-12-19/pdf/2025-23402.pdf> (“With respect to requests that the scope of the rule be expanded further, the Office will closely monitor the use of the new group option and determine whether future consideration is warranted.”); see also Final Rule on Group Registration of Updates to a News Website 89 Fed. Reg. 58992 (Jul. 22, 2024), <https://www.govinfo.gov/content/pkg/FR-2024-07-22/pdf/2024-15880.pdf> (“With respect to requests that we received to expand the scope of the rule, the Office will closely monitor how the new group option performs, including the number and complexity of the claims submitted, the amount of time needed to examine these claims, and the modest filing fee for this option. The Office remains open to revisiting these issues in the future based on this rule’s performance.”)

⁴⁵ NPRM, *supra* note 1 at 13534.

⁴⁶ *Id.*

registration option for updates to non-photographic databases and are often comprised of decentralized, local networks of real estate professionals.⁴⁷

In addition, the assumption is not supported by data about which applications are used by which rightsholders with many corporate filers using the standard application to register a wide variety of works. The discussion of what constitutes a “corporation” for the purposes of differential pricing when it comes to registration fees is not appropriate for this NPRM and current fee study and should be analyzed and discussed further in the context of the comments received in connection with the Copyright Office’s other notice of inquiry regarding alternative fee structures.

D. Elimination of the Single Application Would Further Discourage Creators from Participating in the Copyright Registration System

In the NPRM, the Copyright Office proposes to eliminate the Single Application option based on the facts that there has been a consistent decrease in the use of the Single Application, the Single Application results in the highest percentage of refusals among all types of registration applications, and cost recovery is 10% lower than the rate of cost recovery for Standard Applications.⁴⁸

In light of the overall decline in copyright registrations over the years, there may be a host of other reasons why there has been reduced use of the Single Application form over the years—rather than assuming that this is simply because professional creators do not desire to use the Single Application. In fact, professional creators do view the Single Application as a viable and desirable registration option. In the Copyright Alliance’s survey, 46% of respondents stated that they regularly register single works.⁴⁹ Of those respondents, 69% of them indicated that they utilize the Single Application to register their works, and 59% of respondents using the Single Application

⁴⁷ See NAR Comments, *supra* note 16.

⁴⁸ NPRM, *supra* note 1 at 13533-34.

⁴⁹ See Copyright Alliance Survey, *supra* note 33.

said that they would be less likely to file for copyright registration if the Copyright Office eliminated the Single Application option.

Eliminating the Single Application form will be very harmful for professional creators who do rely on the simplified option to register their works. We understand from anecdotal feedback that some creators solely rely on the Single Application option to register their works.⁵⁰ The Copyright Office should be encouraging more registrations by continuing to provide options that professional creators are clearly using, not discourage participation in the copyright registration system by eliminating registration options that professional creators are still clearly using.

The Copyright Office also notes that the high percentage of refusals of the Single Application is due to applicants routinely using the form to submit works that do not fit necessary criteria.⁵¹ When the primary reason for rejection of the Single Application is that professional creators lack understanding of the form's criteria, the answer should not be to prematurely eliminate the option altogether. It would help to know what criteria applicants get wrong in order to understand how the Copyright Office and other educational outlets, like volunteer legal organizations and the Copyright Alliance, can help creators get it right. If the criteria that applicants are frequently getting incorrect can be caught via guidance or help offered within the application form itself to ensure registrants are meeting the right criteria before submission, those methods should be employed by the Copyright Office. Significantly, many of these problems may disappear when the new ECS registration system is implemented which makes it premature to get rid of the Single Application at this point.

Additional education efforts and outreach to potential applicants before they undertake the Single Application registration process may be useful to reduce the rejection rate. As one of our members, RightsClick notes, they have seen a success rate of around 97% when helping their

⁵⁰ RightsClick, Comment Submitted in Response to the U.S. Copyright Office's March 20, 2026 Notice of Proposed Rulemaking on Copyright Office Fees (May 4, 2026).

⁵¹ NPRM, *supra* note 1 at 13533.

customers register Single Application works, which they attribute to their efforts in explaining the form and its requirements in clear, concise terms as the customer selects the proper form.⁵² This is one area where additional guidance or educational efforts targeting professional creators may help reduce the burdens and costs that arise from erroneous uses of the Single Application form.

We also point out that the FRD Report shows that the costs associated with the Single Applications are a bit lower than costs associated with the Standard Application across various types of works.⁵³ Thus, we gather that the main reason why cost *recovery* may be 10% lower for Single Applications is because the Single Application registration fee at \$45 is also lower than the Standard Application registration fee at \$65. In light of the fact that educational efforts could help close the cost recovery gap, we believe that these options should be explored and implemented first.

We object to the elimination of the Single Application form as many professional creators still rely on the option to register their works and because there are more constructive ways of ensuring that professional creators are successfully registering their works through this option.

III. MODERNIZING THE COPYRIGHT OFFICE'S IT SYSTEMS, WILL INCREASE EFFICIENCY, DECREASE COSTS, AND ENCOURAGE MORE REGISTRATIONS AND SHOULD BE ACCOUTNED FOR WHEN CONSIDERING FUTURE FEES

The Copyright Alliance has always supported prioritizing modernization of the Copyright Office's operations, infrastructure and technologies.⁵⁴ To the extent any fee increases are warranted to fund modernization, that increase should: (1) be a shared responsibility that is borne by all users of the Copyright Office services, not just creators and registration applicants; (2) improve existing

⁵² See RightsClick, *supra* note 50.

⁵³ See FRD Report, *supra* note 18, at 19-21.

⁵⁴ See generally COPYRIGHT ALLIANCE, U.S. COPYRIGHT OFFICE MODERNIZATION: OFFICE STRUCTURE AND OPERATIONS <https://copyrightalliance.org/policy/positions/office-structure-operations/>; see also COPYRIGHT ALLIANCE, U.S. COPYRIGHT OFFICE MODERNIZATION: IMPROVEMENTS TO THE REGISTRATION SYSTEM, <https://copyrightalliance.org/policy/positions/registration-system-improvements-copyright-office/>.

services and add new services; and (3) be invested directly into the copyright registration system infrastructure. The goal of modernizing the Office must be to (1) increase efficiency, (2) decrease costs associated with copyright registration, and (3) ensure pendency remains at low levels.

Since IT modernization will increase efficiency and decrease long-term costs, any cost study associated with the fee increase should take into account the improved efficiencies and cost savings expected with future IT modernization. The FRD Report and NPRM is lacking in that respect, and we question any proposal to raise fees that does not include a detailed analysis and discussion of the positive effects that such modernization may have on costs or fees in the short and long terms. Though modernization costs may seem high now because the Copyright Office is overhauling the copyright registration system, these modernization efforts will yield great efficiencies that drive down costs as the Office transitions into simply maintaining and making small updates to the new system.

We praise the Office for recent, encouraging developments on registration modernization efforts including introducing a pilot version of the new ECS Standard Application form.⁵⁵ However, these developments and, in particular, any detailed discussion of whether or how IT modernization will increase efficiency and decrease costs associated with copyright registration are missing from the FRD Report and NPRM. It makes very little sense to burden professional creators and copyright owners to overpay for outdated systems and inefficient services—especially as registration modernization efforts seem to be on the horizon. As noted above, these discussions are essential if the Office is going to incorporate IT modernization costs into the total cost calculations that lead to the fee increase.

⁵⁵ CPMC Meeting, *supra* note 7.

A. IT Modernization Must Result in a More Efficient Registration Process for Creators and Examiners

It is critical that IT modernization make the registration process more efficient for both creators and examiners. Of those creators surveyed who reported having not filed a copyright registration application with the U.S. Copyright Office within the last five years, 31% said that they have not done so because “it’s too complicated or confusing.”⁵⁶ Improving the website and electronic registration process and making them more user-friendly by, for example, including more pervasive drop-down help menus and intuitive will make for a more simplified and efficient experience. Additionally, use of technologies like ethically trained artificial intelligence and data analytics will improve registration efficiencies, which should enable the Copyright Office to lower fees. Use of these technologies may not only enable the Copyright Office to overcome some of its present technological burdens but may also allow it to leapfrog many years forward. By making the process more efficient for both creators and examiners, the Office will be able to decrease its costs while at the same time encouraging more copyright owners to register their works.

With an improved IT system, the Office should also be able to incorporate technology that will support, for example, the use of third-party application programming interfaces—or APIs—that could integrate registration into a creator’s workflow and streamline and simplify the registration process.⁵⁷ The Office could also charge a fee to allow third-parties to interoperate with the Office’s API or access bulk registration data, which would help the Office recover some of its costs.

As we noted above, until the Copyright Office’s modernization efforts result in more efficient and improved registration systems and processes for professional creators and copyright owners, registration applicants cannot be expected to subsidize the Copyright Office’s IT modernization through registration fees.

⁵⁶ Copyright Alliance Survey, *supra* note 33. This answer was the second most popular reason as to why respondents did not file a registration application with the U.S. Copyright Office in the past five years.

⁵⁷ APIs could also allow third-party platforms to link to the Office’s registration and ownership information to provide more robust information to end users.

Conclusion

We thank you for the opportunity to submit these comments and we look forward to continued discussions with the Copyright Office on these matters. Please let us know if we can provide any additional input or answer further questions.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Kupferschmid', written over a light gray rectangular background.

Keith Kupferschmid
CEO
Copyright Alliance
1331 F Street, NW, Suite 950
Washington, D.C., 20004

May 4, 2026

Appendix

Purpose:

The purpose of the Copyright Alliance’s 2018 Copyright Registration Fee Survey was to gather information to better understand the copyright community’s response to the U.S. Copyright Office’s [proposed fee increase](#) published in the Federal Register on March 20, 2026.

Methods:

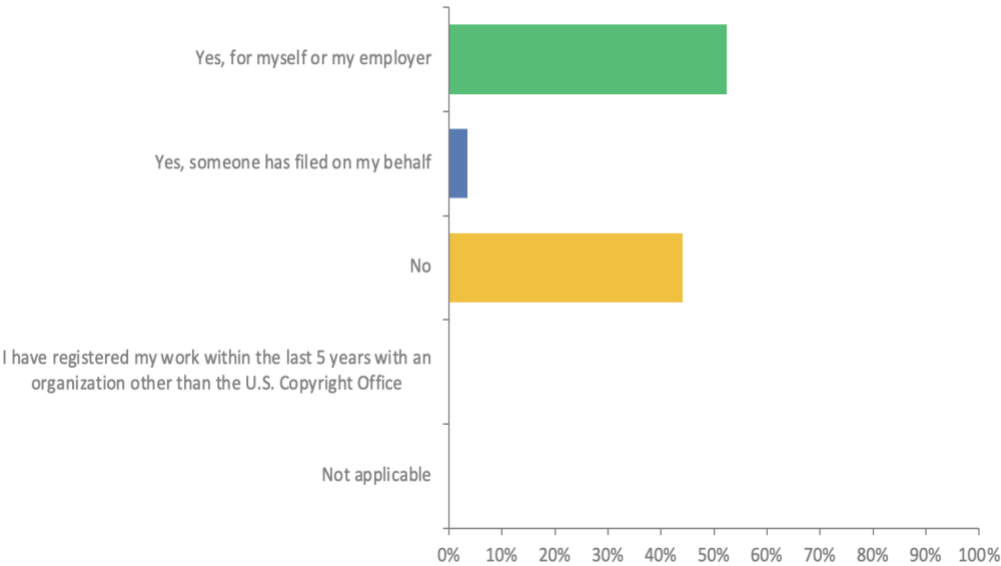
Using Survey Monkey, we created a survey aimed at gathering information about individual creators as well as organizations and companies that register works they produce, distribute or publish. The questions focused on respondents’ copyright registration practices under the current fee schedule, and how those practices might change, if at all, should the proposed fee schedule go into effect.

The survey utilized “branching logic,” meaning that the particular set of questions varied from one respondent to the next based on that respondent’s answers to previous questions in the survey.⁵⁸ The questions were multiple choice, some of which allowed the respondent to select more than one answer. Respondents were also permitted to upload a document to share any additional comments they had regarding the proposed fee increase.

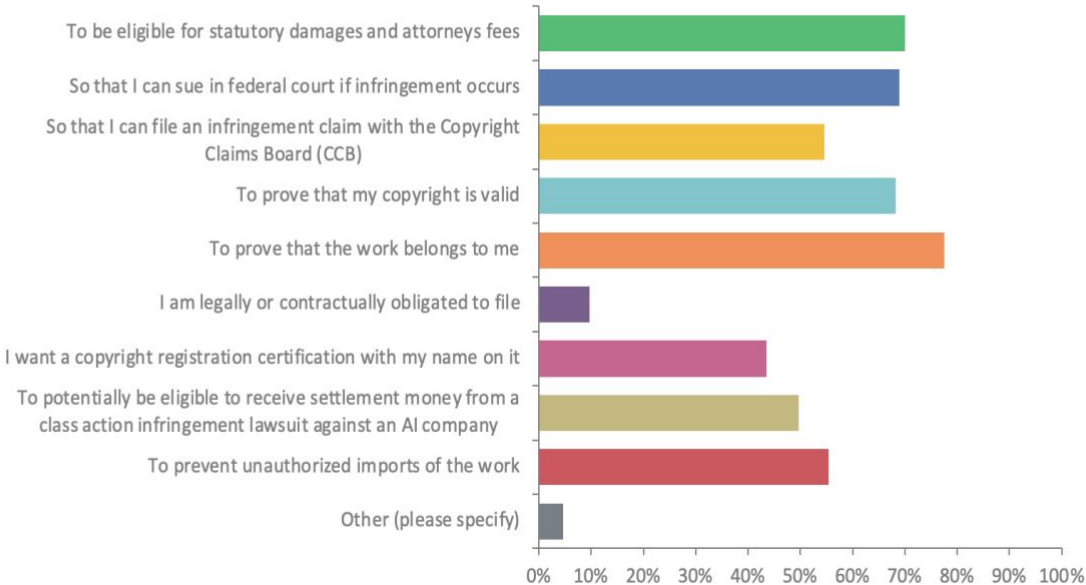
The survey was active beginning April 8, 2026 through April 29, 2026. Over the course of those three weeks, the Copyright Alliance reached out to individual creators, companies, and organizations within the creative industries through email, LinkedIn, Twitter, Facebook, and BlueSky to complete this survey. The survey was also widely distributed by Copyright Alliance member and non-member organizations and individuals. A total of 515 creators, including individuals and businesses who are not members of the Copyright Alliance, took the survey. Below are graphs depicting responses to questions that we referenced throughout these comments.

⁵⁸ For example, those respondents who answered “No” in response to “Have you filed a copyright registration application with the U.S. Copyright Office within the last 5 years?” were not asked “Why do you register works with the U.S. Copyright Office?” or “What’s the most that the U.S. Copyright Office could increase fees before you begin filing fewer registration applications?”

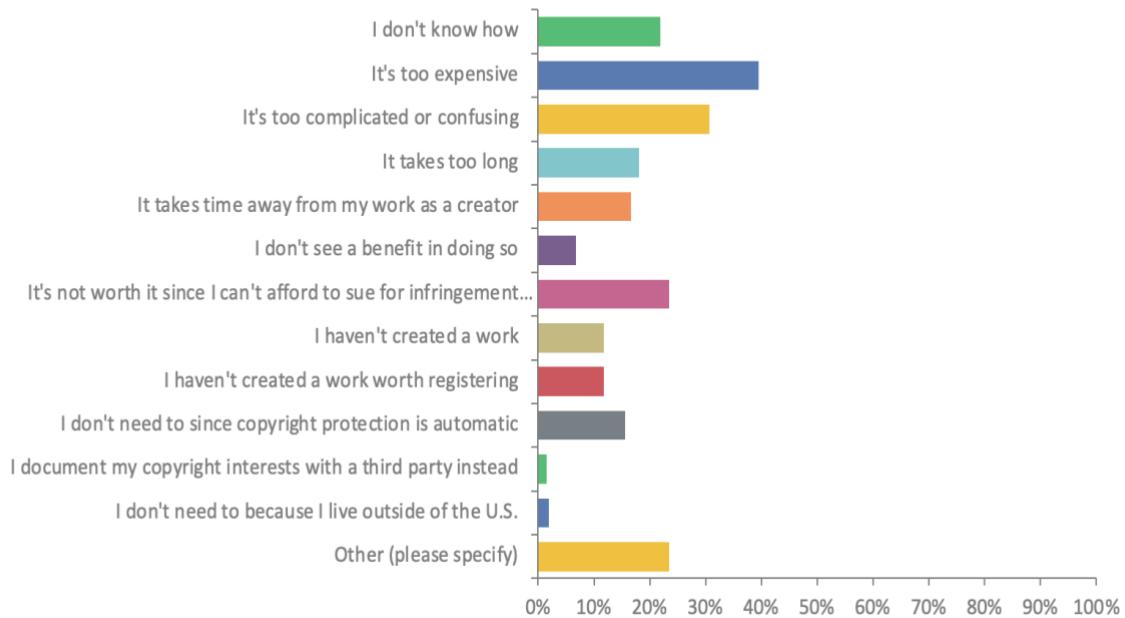
Have you filed a copyright registration application with the U.S. Copyright Office in the last 5 years?



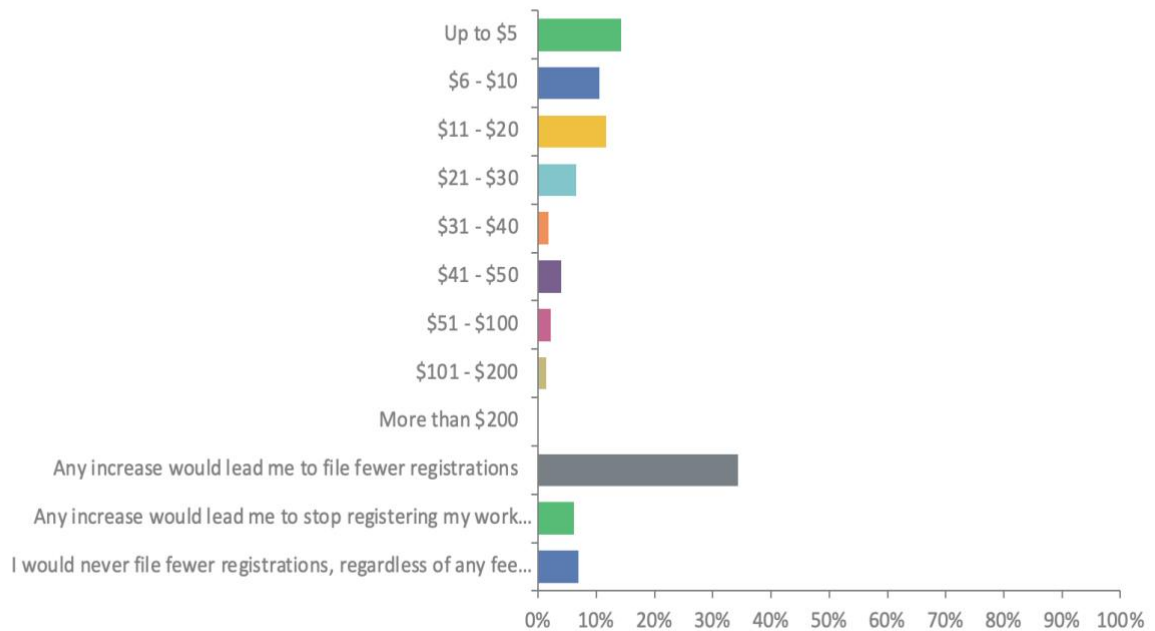
Why do you register your works with the U.S. Copyright Office? (select all that apply)



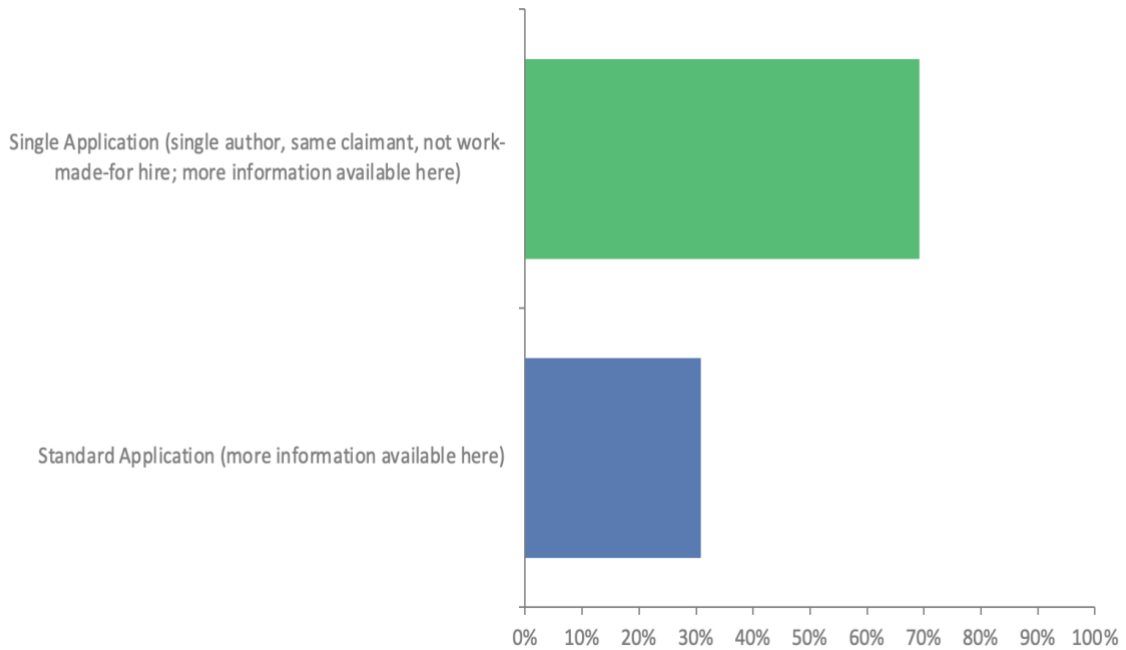
Why haven't you filed a copyright registration application with the U.S. Copyright Office in the last 5 years? (Select all that apply)



What's the most that the U.S. Copyright Office could increase fees before you begin filing fewer registrations?*



Which single work registration application do you use more often?



The Copyright Office has proposed eliminating the Single Application. Would you be less likely to file for copyright registration if the U.S. Copyright Office gets rid of the Single Application? (Click [here](#) to learn more about the Single Application)

