



Commissioner Viviane Reding

Brussels, 06.09.2009

Dear Commissioner Reding,

We represent the European Economic Interest Group, CEPIC, a trade body that is the voice of over 1000 picture agencies and photo libraries in 28 countries across Europe. CEPIC's membership includes large and small photo agencies, news and press agencies, art galleries and museums and, through this membership, more than 30,000 photographers.

As the voice of these photography copyright holders, we openly welcome the idea of digitizing European cultural heritage and making it available to the public through the worldwide internet. Part of our membership is already active in this area, as we represent many major museum libraries and art galleries.

We are happy to read in your statement of 7th September 2009 that any change to copyright law should guarantee fair remuneration but are concerned by any suggestion of easing of copyright rules.

Whilst we are sure that the Commission understands that fair remuneration equates to the copyright holders being remunerated for the reproduction of their work, we seek assurance that any amendment to copyright law should avoid shifting the receipt of revenues from the copyright holders to the users of the work, such as Google, and invoking additional cost in terms of protecting rights with technology.

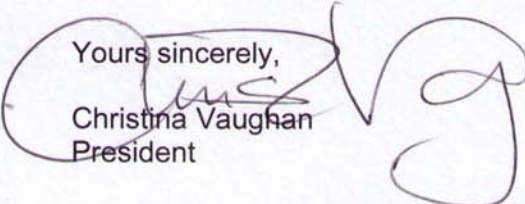
This is a danger if the legislation is not carefully drafted as, for example, in the Orphan Works legislation.

For our industry, the implication of the Google Settlement Agreement is a commercial survival issue for our members. It is not an ideological one.

The image industry has, through its own efforts and initiatives and at its own cost, adapted new technologies and developed solutions to progress its evolution in the age of the internet. However, the shift from print copies to digital copies has significantly reduced the revenues within the photographic industry, while the costs of this transition and online digitization still remain high. In the current economic unrest, revenues of picture agencies have dropped materially - between 20% and 80%. Any significant amendment to copyright law which would place more pressure on content creators, would further endanger the viability of image providers and the medium of photography.

We are open to negotiations and wish to meet with the Commission to explain our position and propose solutions.

Yours sincerely,


Christina Vaughan
President

Co-ordination of European Picture Agencies Press Stock Heritage

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