

Before the  
**COPYRIGHT ROYALTY BOARD**  
**LIBRARY OF CONGRESS**  
Washington, DC

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In the Matter of	)	
	)	
Digital Performance Right in Sound	)	Docket No. 14–CRB–0001 (WR)
Recordings and Ephemeral	)	
Recordings	)	
	)	
Notice of proposed rulemaking	)	
_____	)	

**COMMENTS OF WKNC-FM NORTH CAROLINA STATE UNIVERSITY**

Pursuant to the above captioned Notice of Proposed Rulemaking ("Notice") which appeared in the Federal Register on November 5, 2014, WKNC-FM submits its comments. WKNC-FM is currently considered a Noncommercial Educational Webcaster ("NEW") as defined by 37 CFR §380.21. WKNC-FM is licensed to the Board of Trustees of North Carolina State University, substantially staffed and operated by N.C. State students, and not eligible to received funding from the Corporation for Public Broadcasting.

WKNC-FM supports the rates and terms for 2016-2020 as presented in the Joint Motion from SoundExchange, Inc. and College Broadcasters, Inc. We feel that a \$500 minimum fee for NEWs that do not exceed 159,140 total aggregate tuning hours (ATH) per month is a reasonable rate in respect to the minimal budgets of NEWs like WKNC-FM. We also support the continuance of a \$100 annual proxy fee in lieu of providing report of use for those NEWs that do not exceed 80,000 ATH per month and the increase of the ATH cap from 55,000 to 80,000.

Dated: NOVEMBER 17, 2014

Respectfully submitted,



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