

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

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In the Matter of	)	
	)	
	)	Docket No. 14-CRB-0008-SD (2010-2012)
Distribution of the 2012	)	
Satellite Royalty Funds	)	
	)	

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**COMMENTS OF THE BROADCASTER CLAIMANTS GROUP  
REGARDING MOTION FOR PARTIAL DISTRIBUTION  
OF 2012 SATELLITE FUNDS**

The Broadcaster Claimants Group (“BCG”) files these comments in the above-referenced proceeding in response to the Notice issued by the Copyright Royalty Judges on October 1, 2014. The Notice requests comment on the proposed partial distribution of 2012 satellite funds, as well as on the existence of Phase I and Phase II controversies with respect to the distribution of 2012 satellite funds.

BCG has joined the other Phase I Parties in Comments being filed concurrently herewith that address the statutory basis and predicate upon which the parties’ Motion was filed and should be granted. BCG responds below to the further questions posed by the Notice.

**A. Existence of Phase I Controversies**

With respect to the 2012 satellite funds, BCG believes that a Phase I controversy exists at the present time among the Phase I Parties (BCG, Program Suppliers, Joint Sports Claimants, Devotional Claimants, and Music Claimants).<sup>1</sup>

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<sup>1</sup> Each Phase I Party will represent the claimants of the programs defined as being within its respective category, which definitions are not fully captured in the shorthand references to program categories referred to in Footnote 1 of the Judges’ Notice. See 79 Fed. Reg. 59306, 59307 n.1 (October 1, 2014).

**B. Existence of Phase II Controversies**

With respect to the Phase II distribution of 2012 satellite royalties within the Broadcaster Claimants Group category, BCG is unaware of any controversy at this time. BCG is aware of the existence of Phase II controversies regarding 2012 satellite royalty funds between commercial television broadcaster claimants and other claimants within the Program Suppliers, Devotional, and Music categories. BCG reserves its right to make or withdraw Phase II claims in response to the rulings of the Copyright Royalty Judges, the outcome of the 2012 Phase I satellite distribution proceedings, the acquisition of additional evidence, or the filings of additional claimant parties.

**C. Conclusion**

As a signatory of the Motion of Phase I Claimants for Partial Distribution filed on July 25, 2014, seeking distribution of sixty percent of the 2012 satellite funds, BCG strongly supports distributing those funds, as described in the Motion. BCG believes there can be no reasonable justification for objecting to the distribution of the requested amounts.

BCG respectfully urges the Copyright Royalty Judges to make the partial distribution as requested.

Respectfully submitted,

**BROADCASTER CLAIMANTS GROUP**



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October 31, 2014

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 31st day of October, 2014, a copy of the foregoing Comments of the Broadcaster Claimants Group Regarding Motion for Partial Distribution of 2012 Satellite Funds was sent by overnight mail to the following:

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