

**Before the
COPYRIGHT ROYALTY JUDGES
Washington, DC**

In the Matter of

**Distribution of the
2013 Cable Funds**

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)
) **Docket No. 14-CRB-CD-0010-CD (2013)**
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)

**COMMENTS OF PROGRAM SUPPLIERS
ON THE EXISTENCE OF CONTROVERSIES**

The Motion Picture Association of America, Inc. ("MPAA"), on behalf of producers and distributors of syndicated series, including non-team sports, movies, and specials broadcast by television stations whose signals are carried as distant signals by cable systems ("Program Suppliers"), hereby submits its comments in response to the request for comments published by the Copyright Royalty Judges ("Judges") on December 22, 2014. *See Distribution of the 2013 Cable And Satellite Royalty Funds*, 79 Fed. Reg. 76396 (December 22, 2014) ("Notice"). The Notice requests comments regarding "the existence and extent of any controversies regarding distribution of the 2013 cable and satellite royalty funds." Notice at 76396. MPAA addresses controversies as to the 2013 cable royalty fund ("2013 Cable Fund") in these comments.

I. Controversies With Respect to the 2013 Cable Fund

A. Phase I Controversies

Historically, at the Phase I level, MPAA has represented the interests of all copyright owners of syndicated series, movies, specials and non-team sports broadcast by television stations

during the royalty years at issue in those proceedings (“Program Suppliers”).¹ MPAA intends to represent the interests of those same Program Suppliers in Phase I of the distribution of the 2013 Cable Fund. A controversy currently exists regarding the Phase I distribution of the royalties within the 2013 Cable Fund. Program Suppliers anticipate that a hearing will be necessary to resolve this Phase I controversy, and recommend that the Judges consolidate the outstanding Phase I controversy as to the 2013 Cable Fund with pending Docket No. 14-CRB-0007-CD (2010-12). If Phase I hearings are held, MPAA intends to participate fully in those hearings as the Phase I representative of the Program Suppliers category. MPAA will represent the interests of producers and distributors of syndicated series, movies, specials, and non-team sports, including the interests of copyright owners who have agreed to representation by MPAA.

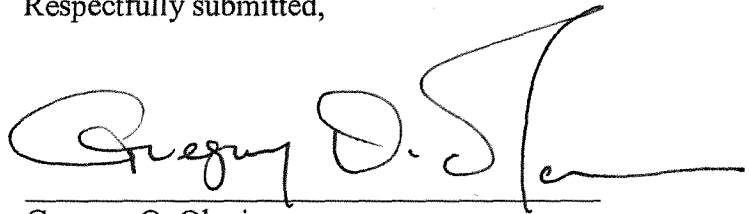
B. Phase II Controversies

In Phase II of the distribution of the 2013 Cable Fund, MPAA will represent the MPAA-represented Program Suppliers exclusively. MPAA-represented Program Suppliers have claims to royalties awarded for movies, syndicated programming, and special programs, including non-team sports programming, as to the 2013 Cable Fund. To the extent a claimant not represented by MPAA makes a claim that could impact the claims of the MPAA-represented Program Suppliers in the course of these comments, a Phase II controversy would exist against the MPAA-represented Program Suppliers. MPAA-represented Program Suppliers are aware of Phase II controversies in the Program Suppliers category between the MPAA-represented Program Suppliers and those Program Suppliers represented by the National Association of Broadcasters (“NAB”) and Independent Producers Group (“IPG”).

¹ This definition of the Program Suppliers Phase I category is consistent with the longstanding definition of the Program Suppliers category that has been stipulated to by the parties in past royalty distribution proceedings. *See Joint Motion Of The Phase I Parties To Adopt Stipulation As To Claimant Group Categorization And Scope Of Claims*, Docket No. 2007-3 CRB CD 2004-2005 at Exhibit A (October 2, 2009).

MPAA has not reached a Phase II settlement with either NAB or IPG as to the 2013 Cable Fund, and it anticipates that a hearing will be necessary to resolve those controversies. If Phase II hearings are held, MPAA intends to participate fully in those hearings. MPAA will represent the producers and/or distributors of syndicated series, including non-team sports, movies, and specials who have agreed to representation by MPAA.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregory O. Olaniran", with a long horizontal flourish extending to the right.

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Dated: January 21, 2015

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of January, 2015, a copy of the foregoing Comments of Program Suppliers on the Existence of Controversies was sent by Federal Express to the individuals listed on the attached service list.

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