

**Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.**

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**In the Matter of** )  
 )  
**Distribution of the 2008** )  
**Cable Royalty Funds** )

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**Docket No. 2010-6 CRB CD 2008**

**COMMENTS OF THE  
COMMERCIAL TELEVISION CLAIMANTS  
REGARDING MOTION FOR PARTIAL DISTRIBUTION OF 2008 CABLE FUNDS**

The Commercial Television Claimants (“CTV”), represented by the National Association of Broadcasters (“NAB”), file these comments in the above-referenced proceeding in response to the Notice issued by the Copyright Royalty Judges on October 29, 2010. The Notice requests comments on the proposed partial distribution of 2008 cable funds, as well as on the existence of Phase I and Phase II controversies with respect to the distribution of 2008 cable funds.

CTV 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. CTV responds below to the further questions posed by the Notice.

**A. Existence of Phase I Controversies**

With respect to the 2008 cable funds, CTV believes that Phase I controversies exist at this time between CTV and all other claimants and claimant groups, including Program Suppliers, Joint Sports Claimants, Public Television Claimants, Music Claimants, Canadian Claimants, Devotional Claimants, and National Public Radio.

## **B. Existence of Phase II Controversies**

With respect to the Phase II distribution of 2008 cable royalties within the Commercial Television category, CTV is unaware of any controversy at this time. CTV is aware of the existence of Phase II controversies between commercial television station claimants represented by NAB and other claimants within the Program Suppliers, Public Television, Devotional, and Music categories. CTV reserves its right to make or withdraw Phase II claims in response to the rulings of the Copyright Royalty Judges, the outcome of the 2008 cable distribution proceedings, the acquisition of additional evidence, or the filings of additional claimant parties.

## **C. Conclusion**

As a signatory of the Joint Motion for Partial Distribution filed on September 21, 2010, seeking distribution of fifty percent of the 2008 cable funds, CTV strongly supports distributing those funds, as described in the Motion and its attachments. CTV believes there can be no reasonable justification for objecting to the distribution of all such amounts. Withholding the remaining fifty percent of the 2008 cable funds should fully protect all legitimate claims.

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

Respectfully submitted,

**COMMERCIAL TELEVISION CLAIMANTS**

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November 29, 2010

## CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November, 2010, a copy of the foregoing Comments of the Commercial Television Claimants Regarding Motion for Partial Distribution of 2008 Cable Funds was sent by e-mail and first class mail to the following:

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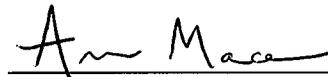
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A handwritten signature in cursive script that reads "Ann Mace". The signature is written in black ink and is positioned above a horizontal line.

Ann Mace

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