

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

)	
In the Matter of)	
)	Docket No. 2011-7 CRB CD 2009
Distribution of the 2009)	
Cable Royalty Funds)	
)	

**COMMENTS OF THE
COMMERCIAL TELEVISION CLAIMANTS
REGARDING MOTION FOR PARTIAL DISTRIBUTION OF 2009 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 September 6, 2011. The Notice requests comments on the proposed partial distribution of 2009 cable funds, as well as on the existence of Phase I and Phase II controversies with respect to the distribution of 2009 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 2009 cable funds, a Phase I controversy exists at the present time among the Phase I Parties (CTV, Program Suppliers, Joint Sports Claimants, Public Television Claimants, Music Claimants, Canadian Claimants, Devotional Claimants, and National Public Radio). However, the Phase I Parties are in the process of negotiating an agreement that they believe will resolve the existing controversy.

B. Existence of Phase II Controversies

With respect to the Phase II distribution of 2009 cable royalties within the Commercial Television category, CTV is unaware of any controversy at this time. A Phase II controversy exists with respect to the distribution of 2009 Program Suppliers royalties between claimants represented by NAB and those represented by MPAA, but NAB and the MPAA-represented Program Suppliers are in the process of finalizing an agreement that they believe will resolve that existing controversy. NAB has reached an agreement with PBS resolving its Phase II controversies with respect to the 2009 PTV royalties. CTV is aware of the existence of Phase II controversies between commercial television station claimants represented by NAB and other claimants as to the distribution of the 2009 Devotional royalties and the 2009 Music royalties. 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 2009 cable distribution proceedings, the acquisition of additional evidence, or the filings of additional claimant parties.

C. Conclusion

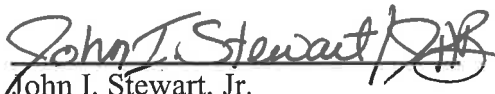
As a signatory of the Joint Motion for Partial Distribution filed on August 5, 2011, seeking distribution of fifty percent of the 2009 cable funds, CTV strongly supports distributing those funds, as described in the Motion and its attachments. CTV believes there can be no reasonable justification for objecting to the distribution of all such amounts.

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

Respectfully submitted,

COMMERCIAL TELEVISION CLAIMANTS

**NATIONAL ASSOCIATION OF
BROADCASTERS**

A handwritten signature in black ink that reads "John I. Stewart, Jr." with a stylized flourish at the end.

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October 6, 2011

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October, 2011, a copy of the foregoing Comments of the Commercial Television Claimants Regarding Motion for Partial Distribution of 2009 Cable Funds was sent by e-mail and first class mail to the following:

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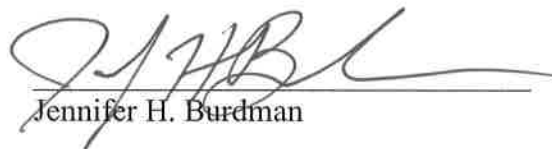
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