Electronically Filed Docket: 16-CRB-0010-SD (2014)

Filing Date: 12/10/2018 10:20:13 AM EST

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

In the Matter of

Distribution of the 2014-2017 Cable and Satellite Royalty Funds **Consolidated Docket Nos.:**

16-CRB-0009 CD 16-CRB-0010-SD

COMMENTS OF GLOBAL MUSIC RIGHTS, LLC REGARDING PHASE II CONTROVERSIES

Global Music Rights, LLC ("GMR") is one of the Phase II claimants within the Phase I Music claimant category for Section 111 cable and Section 119 satellite royalties for the 2016 and 2017 calendar years. GMR submits these Comments in response to the Notice published at 83 Fed. Reg. 56105 (November 9, 2018) (the "Notice"). The Notice seeks, among other things, comments regarding the existence of any Phase II controversies as to the 2014-2017 cable and satellite royalty funds.

In response to the Notice, Global Music Rights, LLC states that a Phase II controversy currently exists as to the royalty shares that should be allocated among itself and the other Phase II Claimants within the Phase I Music claimant category, for the 2016 and 2017 calendar years. Global Music Rights, LLC is not aware of any other Phase II controversies within the Phase I Music claimant category.

Dated: December 10, 2018

Respectfully, submitted,

/s/ Scott Zebrak

Scott Zebrak

Steven Surachman OPPENHEIM + ZEBRAK, LLP 4530 Wisconsin Avenue NW, 5th Floor Washington, DC 20016

Tel: 202.480.2999 Fax: 866.766.1678

Counsel for Global Music Rights, LLC