

BEFORE THE
COPYRIGHT ROYALTY TRIBUNAL
Washington, D.C.

1990 Satellite Carrier Royalty)
Distribution Proceeding)
_____)

CRT Docket No. 91-5-90SCD

COMMENTS OF U.S. COMMERCIAL TELEVISION BROADCASTER
CLAIMANTS ON EXISTENCE OF CONTROVERSY AND
NOTICE OF INTENT TO PARTICIPATE


The U.S. Commercial Television Broadcaster Claimants ("Broadcaster Claimants")^{1/}, by their counsel, submit these comments in response to the Notice issued by the Copyright Royalty Tribunal on August 2, 1991.

The Broadcaster Claimants believe that a controversy currently exists with regard to the distribution of 1990 satellite royalties, and intend to participate in any 1990 Satellite Royalty Distribution Proceedings before the Tribunal. The Broadcaster claimants support the Tribunal's proposal to consolidate 1990 and 1989 distribution proceedings in order to conserve the resources of the parties and the Tribunal, subject to whatever procedural accommodations may be necessary to assure fair consideration of

^{1/} The Broadcaster Claimants Group includes the following stations retransmitted by satellite carriers during 1990: KMGH, KTLA, KWGN, WGN, WPIX, WSBK, WTBS AND WWOR.

material differences in the circumstances of the satellite retransmissions in the respective years.

Respectfully submitted,



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COUNSEL FOR THE BROADCASTER
CLAIMANTS

September 6, 1991

CERTIFICATE OF SERVICE

I, Pamela Jo Kepner, hereby certify that I have, on this 6th day of September, 1991, caused copies of the attached "Comments of U.S. Commercial Television Broadcaster Claimants on Existence of Controversy and Notice of Intent to Participate" to be mailed first class, postage prepaid, to the following parties:

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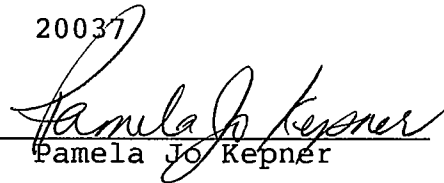
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September 6, 1991

The Hon. Mario Aguero
Chairman
Copyright Royalty Tribunal
1825 Connecticut Avenue, N.W.
Suite 918
Washington, D.C.

Re: 1990 Satellite Royalty Distribution
Proceeding (CRT Docket No. 91-5-90SCD)

Dear Chairman Aguero:

Transmitted herewith for filing on behalf of Broadcaster Claimants, are an original and five copies of "Comments of U.S. Commercial Television Broadcaster Claimants on Existence of Controversy and Notice of Intent to Participate".

Should there be any questions regarding this matter, please communicate with this office.

Very truly yours,



John I. Stewart, Jr.

Enclosure