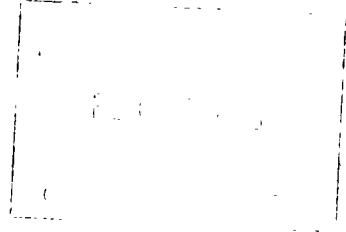


Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.



In the Matter of)
)
Distribution of the 2011)
Cable Royalty Funds)
_____)

Docket No. 2012-9 CRB CD 2011

**COMMENTS OF THE
COMMERCIAL TELEVISION CLAIMANTS
REGARDING MOTION FOR PARTIAL DISTRIBUTION OF 2011 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 January 18, 2013. 78 Fed. Reg. 4169 (Jan. 18, 2013). The Notice requests comments on the proposed partial distribution of 2011 cable funds, as well as on the existence of Phase I and Phase II controversies with respect to the distribution of 2011 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 2011 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, Devotional Claimants, Canadian Claimants, and National Public Radio).

B. Existence of Phase II Controversies

With respect to the Phase II distribution of 2011 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 2011 Program Suppliers royalties between claimants represented by NAB and those represented by MPAA. A Phase II controversy exists with respect to the distribution of 2011 Public TV royalties between claimants represented by NAB and those represented by PBS. 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 2011 Devotional royalties and the 2011 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 2011 Phase I cable distribution proceedings, the acquisition of additional evidence, or the filings of additional claimant parties.

C. Conclusion

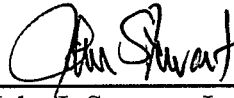
As a signatory of the Motion of Phase I Claimants for Partial Distribution filed on December 12, 2012, seeking distribution of fifty percent of the 2011 cable funds, CTV strongly supports distributing those funds, as described in the Motion and its attachments. CTV believes there can be no reasonable 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

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February 19, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of February, 2013, a copy of the foregoing
Comments of the Commercial Television Claimants Regarding Motion for Partial Distribution of
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