

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

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

Docket No. 14-CRB-0010-CD
(2010-2013)

**RESPONSE OF
NATIONAL PUBLIC RADIO, INC.
TO THE JUDGES' OCTOBER 14, 2020 ORDER**

National Public Radio, Inc. (“NPR”) hereby responds to the Judges’ Order, dated October 14, 2020, directing “all participants in the captioned proceedings to review the calculations on Appendix A and file a notice with the Judges no later than October 26, 2020, stating whether or not they believe any clarifications to the calculations are necessary and, if so, providing an explanation of all proposed clarifications.” *See Order Directing Parties To Review Calculations Of Final Distribution Share*, Docket No. 14-CRB-0010-CD (2010-13), dated October 14, 2020 (“*October 14, 2020 Order*”).

NPR previously settled its joint claims to the 2010-2013 cable royalties on behalf of itself and its participating Members. *Order Granting Motion for Final Distribution of 2010-2013 Cable Royalty Funds to National Public Radio*, Docket No. 14-CRB-0010 CD (2010-2013), dated August. 23, 2017. Given the prior resolution of NPR’s joint claims, the Judges’ recent *Order Directing Calculation of Final Distribution Shares* in the above-captioned proceeding does not provide for any distribution of remaining 2010-2013 cable royalties to NPR and its participating Members. *See Order Directing Calculation of Final Distribution Shares*, Docket No. 14-CRB-0010-CD (2010-13), dated October 2, 2020 (“*October 2, 2020 Order*”).

Nonetheless, in response to the *October 14, 2020 Order*, NPR advises the Judges that it is not aware of a need for clarification of the calculations set forth in Attachment A to the *October 14, 2020 Order* with respect to the partial and final distribution amounts attributed to NPR. To avoid any misunderstanding, however, NPR notes that its share of the 2010-2013 cable royalties was taken “off the top” of the total cable royalties for each claim year rather than as a percentage of the “Basic Fund,” “3.75% Fund,” and “Syndex Fund” sub-funds that collectively make up each year’s total cable royalty pool. *Cf, e.g., October 14, 2020 Order*, Attachment A at 4 (for the “National Public Radio (NPR)” entry, showing specific dollar amounts, but not percentages, for each of the sub-funds). Accordingly, NPR understands the specific allocation of sub-fund amounts to NPR shown in Attachment A to be immaterial either to the calculation of royalties previously distributed to NPR or to the prospective distribution of royalties pursuant to the *October 2, 2020 Order*.

Respectfully submitted,

/s/ Gregory A. Lewis

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Date: October 26, 2020

Proof of Delivery

I hereby certify that on Friday, October 30, 2020, I provided a true and correct copy of the Response of National Public Radio, Inc. to the Judges' October 14, 2020 Order to the following:

SESAC Performing Rights, LLC, represented by John C. Beiter, served via ESERVICE at john@beiterlaw.com

Joint Sports Claimants, represented by Michael E Kientzle, served via ESERVICE at michael.kientzle@apks.com

Commercial Television Claimants (CTC), represented by John Stewart, served via ESERVICE at jstewart@crowell.com

Public Television Claimants (PTC), represented by Ronald G. Dove Jr., served via ESERVICE at rdove@cov.com

Broadcast Music, Inc. (BMI), represented by Brian A Coleman, served via ESERVICE at Brian.Coleman@dbr.com

Devotional Claimants, represented by Matthew J MacLean, served via ESERVICE at matthew.maclean@pillsburylaw.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis, served via ESERVICE at smosenkis@ascap.com

MPA-Represented Program Suppliers, represented by Gregory O Olaniran, served via ESERVICE at goo@msk.com

Canadian Claimants Group, represented by Lawrence K Satterfield, served via ESERVICE at lksatterfield@satterfield-pllc.com

Signed: /s/ Gregory A Lewis