

NCAA had the opportunity which the Tribunal afforded every other party to present evidence. NCAA's failure to take advantage of that opportunity should not occasion opening these proceedings up to discovery demands. Certainly, NCAA has no greater entitlement to discovery, for example, than do the Joint Sports Claimants for data underlying the bi Associates' part of the NAB case or data underlying Study A offered by MPAA.

Furthermore, it is manifest that the Tribunal has already ruled on the question presented by NCAA by its denial of an April 17, 1980, Motion of the Program Syndicators for information underlying the BBDO survey. The considerations underlying the Joint Sports Claimants' opposition to that motion apply with force here: (1) the proceedings have not yet involved discovery, provision for which is not made in the Tribunal's rules, and it would be unfair to subject the Joint Sports Claimants alone to discovery; (2) NCAA does not have a need for the data -- it had the opportunity to

develop its own evidence to support any claim; and, (3) to provide such materials would open the expedited proceedings to an abundance of discovery requests.

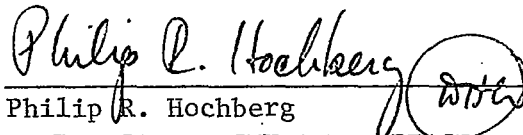
The motion of NCAA should be denied.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of May, 1980, copies of the foregoing Reply were served upon parties to this proceeding by first class mail, postage prepaid, addressed to each of the following:

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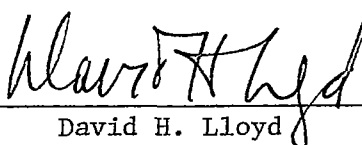
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A handwritten signature in cursive script, appearing to read "David H. Lloyd", is written above a horizontal line.

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