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June 4, 1980

Gordon T. King, Esquire
Coudert Brothers
Pan American Building
200 Park Avenue
New York, New York 10017

Dear Mr. King:

I have your letter of May 30, 1980 "designating" certain television contracts. Your letter confirms that the NAB and the claimants it represents are not challenging the cable royalty claims made by 8 of the 26 Major League Baseball clubs; 9 of the 23 NBA clubs; 8 of the 15 NHL clubs (note that the Cincinnati Stingers is not an NHL club); and 18 of the 22 NASL clubs.

In accordance with the Tribunal's earlier ruling, we requested, on May 22, 1980, that you "identify each broadcaster you are authorized to represent which claims that it is entitled to the royalties attributable to [the telecasts identified by the clubs which we are authorized to represent]." While your May 30 letter identifies certain clubs whose royalty claims the NAB appears to challenge, you have not advised us of which specific broadcasters you and the NAB are authorized to represent, and which of these broadcasters in fact dispute the claims of our clubs.

We note, for example, that your letter identifies the Chicago Cubs. It is our understanding that the Cubs have entered into an agreement with WGN which clearly provides that: 1) the Cubs own the copyright in their telecasts; 2) the Cubs are entitled to claim and to receive the cable

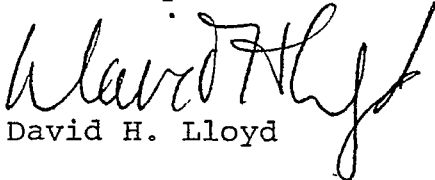
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royalties attributable to these telecasts; and 3) the Cubs will remit one-half of the royalties received to WGN. This agreement specifically covers the 1979-82 seasons and is not, by its terms, applicable to 1978; the contract covering the 1978 season was, of course, negotiated well in advance of the current dispute before the Tribunal. Nevertheless, agreements such as that between the Cubs and WGN suggest to us that certain clubs and their flagship stations have been able to resolve this matter among themselves. Consequently, we believe that there are serious and legitimate questions as to the scope of the sports controversy which you and the NAB suggest in your May 30 letter.

Under these circumstances, we again request that you identify the broadcasters you and NAB are authorized to represent and which of these broadcasters in fact dispute the claims of our clubs. With such information, hopefully we might resolve this matter in the expeditious manner which the Tribunal contemplated.

Sincerely,



David H. Lloyd

cc: Members of the
Copyright Royalty Tribunal