

JUN 9 1980 RECD

Before the  
COPYRIGHT ROYALTY TRIBUNAL  
Washington, D.C. 20036

ORIGINAL

In re )  
 )  
DISTRIBUTION OF CABLE ) CRT 79-1  
TELEVISION ROYALTY FEES )

COMMENTS

The Christian Broadcasting Network, Inc., (hereafter "CBN") by its attorneys, submits these comments in response to paragraph 4 of the Tribunal's May 7, 1980 notice requesting that all "joint claimants" submit certain information concerning the ultimate distribution of royalties to their members.

CBN is not a "joint claimant" or a member of any "joint claimant" group. Rather, CBN has filed an individual claim for a portion of the copyright royalty fees paid by cable systems for the rebroadcast of CBN's copyrighted television programming during the period January 1 through December 31, 1978. CBN's interest in this proceeding is not represented by any of the "joint claimants", nor does anyone represent CBN but its counsel of record.


The Tribunal has elected to recognize in Phase I of this proceeding broad generic groups of copyright owners to which it proposes to assign percentages of the total copyright


royalty pool. It is the belief of CBN that its claim stands alone and should not be aggregated with other claimants into a major claimant group. Should the Tribunal make allocations by claimant categories, however, CBN would reiterate<sup>1/</sup> that it is a religious program syndicator and therefore its individual share of the royalty pool should be included in the Phase I allocation to the general "syndicator" group.

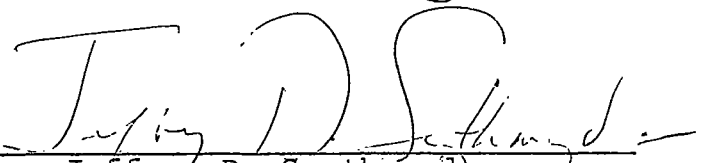
CBN is not a party to any agreement which may exist between any of the other individual syndicator claimants regarding the method by which the Phase I allocation to the "syndicator" group should be divided.

Respectfully submitted,

The Christian Broadcasting Network, Inc.

By   
Grover C. Cooper

By   
Clifford M. Harrington

By   
Jeffrey D. Southmayd

Its Attorneys

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<sup>1/</sup> See "Direct Case of The Christian Broadcasting Network, Inc." at page 7, fn. #20.

CERTIFICATE OF SERVICE

I, Clifford M. Harrington, hereby certify I have this  
6th day of June, 1980, mailed by first class United  
States mail, postage pre-paid, copies of the foregoing  
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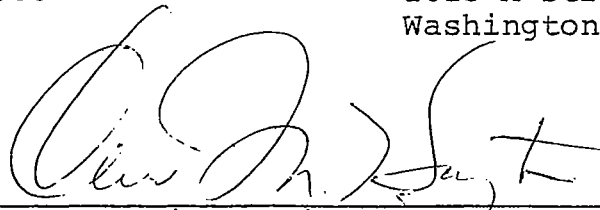
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