

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of )  
 )  
Distribution of ) Docket No. 16-CRB-0009 CD (2014-17)  
2014-2017 )  
Cable Royalty Funds )

**MULTIGROUP CLAIMANTS' COMMENTS ON  
THE EXISTENCE AND EXTENT OF CONTROVERSIES**

Multigroup Claimants ("MC") hereby submits its Notice of Controversy in response to the Copyright Royalty Judges' request for comments on the existence and extent of controversies to 2014-2017 cable royalties, as published in the Federal Register on November 9, 2018 (83 Fed. Reg. 56106), in the above-referenced consolidated docket.

MC, as represented by the undersigned counsel, has claims to 2015-2017 royalties awarded for retransmitted broadcasts appearing in the following categories: sports programming, program suppliers, devotional programming, Canadian programming, and non-commercial programming.

At this time, MC has (as successor in interest to Independent Producers Group) resolved its allocation of funds in the non-commercial programming

category by engagement of Public Broadcasting Service as its agent for collection of royalties, pursuant to an agreed-upon methodology. MC has not engaged in negotiations to resolve the allocation of funds within the remaining categories.

While MC remains optimistic that a settlement could be reached, it remains possible that a hearing may be necessary to resolve controversies including the amount of royalties to be allocated to MC-administered broadcasts. If resolution of those claims is not reached, MC intends to participate in both allocation and distribution phases of these proceedings.

Respectfully submitted,

Dated: December 7, 2018

\_\_\_\_\_/s/\_\_\_\_\_  
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