

FEB 27 1984

ORIGINAL

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

In the Matter)
)
1981 CABLE TELEVISION) CRT Docket No. 82-1
ROYALTY DISTRIBUTION)
PROCEEDING)

COMMENTS OF
NATIONAL ASSOCIATION OF BROADCASTERS
ON MPAA "SUPPLEMENT" TO ITS
PROPOSED FINDINGS OF FACT
AND CONCLUSIONS OF LAW ON PHASE II ISSUES

On February 22, 1984, the Motion Picture Association of America (MPAA) filed a pleading to correct its Proposed Phase II Findings, because it had improperly claimed that Spanish International Network (SIN) was a member of the group of program syndicators for which it was claiming royalties.

In addition to withdrawing its improper claim to receive royalties for SIN, however, MPAA has also proposed a new allocation of royalties, which reflects its "heads we win, tails you lose" approach. While MPAA was happy enough to claim all of SIN's royalties for itself in its original Proposed Findings, MPAA now seeks to cure its mistake by proposing that part of the 0.7 percent award be deducted from the Tribunal's award to Multimedia and the NAB-

represented program suppliers. Under MPAA's own analysis, these deductions would be wrong. NAB's Proposed Findings properly reflect the allocation of the agreed award to SIN, as well as the awards to the other Phase II parties.

Respectfully submitted,

NATIONAL ASSOCIATION OF
BROADCASTERS



By:

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Its Attorneys

February 27, 1984

CERTIFICATE OF SERVICE

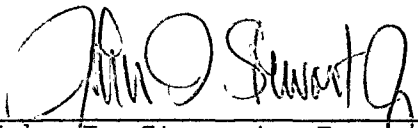
I, John I. Stewart, Jr., hereby certify that true and correct copies of the foregoing "Comments of National Association of Broadcasters on MPAA "Supplement" To Its Proposed Findings of Fact and Conclusions of Law on Phase II Issues" were mailed, via United States First Class Mail, this 27th day of February, 1984, to the following:

*The Honorable Thomas C. Brennan
Chairperson
Copyright Royalty Tribunal
1111 20th Street, N.W.
Washington, D.C. 20036

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February 27, 1984

The Honorable Thomas C. Brennan
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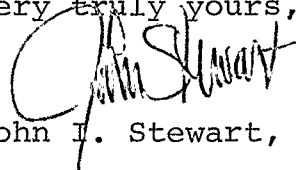
Re: CRT Docket No. 82-1

Dear Chairman Brennan:

Transmitted herewith for filing are an original and 15 copies of the "Comments of National Association of Broadcasters on MPAA 'Supplement' to its Proposed Findings of Fact and Conclusions of Law on Phase II Issues" in the above-referenced proceeding.

Should there be any questions concerning this matter, please communicate with this office.

Very truly yours,


John I. Stewart, Jr.

Enclosures