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

In the Matter of)
)
Supplemental Rule With)
Respect to Filing of)
Claims to Cable Royalty)
Fees)

COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS

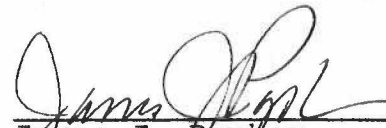
The National Association of Broadcasters (NAB) hereby submits its comments in response to the Notice of Proposed Rule Making, 44 Fed. Reg. 20220 (April 4, 1979). NAB's only concern with the rules proposed by the Tribunal is that sufficient information concerning the formula or criteria for distribution and the carriage of broadcast stations by cable systems may not be available to potential claimants at an early enough time to permit compliance with the provisions during July, 1979. The amount of time to obtain and process the required information on cable carriage is substantial, particularly considering the need for corrections to the statements filed by some cable systems. Therefore, NAB is concerned that claimants may not have access to the information which is required to file a claim in compliance with the proposed rule. NAB, thus, urges the

Tribunal at least to indicate its willingness to waive the rule in the event claimants are unable to obtain the necessary information by July, 1979. NAB recognizes that claims for the last six months of 1978 must be filed in July, 1979, but will urge the Tribunal to require only the minimal information required in July, 1978, in the event temporary waivers were considered appropriate.

Respectfully submitted,
NATIONAL ASSOCIATION OF BROADCASTERS
1771 N Street, N.W.
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Erwin G. Krasnow



James J. Popnam

April 25, 1979