

**Title: Determination of Rates and Terms for Digital Performance of Sound Recordings and Making of Ephemeral Copies to Facilitate Those Performances (Web VI)**  
**Docket Number: 23-CRB-0012-WR (2026-2030)**

### Comments on Proposed Rule

Definitions (§ 380.20)

I would like to suggest that two additional definitions be included in the proposed rule.

Aggregate Tuning Hours (ATH): I suggest the following definition:

“The total hours of audio programming transmitted by a Noncommercial Educational Webcaster to all listeners within the United States, across all channels and stations. This total excludes the running time of sound recordings licensed directly by the webcaster or exempt from licensing under Title 17 of the United States Code.”

Proxy Fee: I suggest adding a definition for Proxy Fee.

Suggested Definition: “A nonrefundable annual fee of \$100, paid by a Noncommercial Educational Webcaster instead of submitting detailed usage reports, provided the webcaster meets specific Aggregate Tuning Hours (ATH) conditions.”

Thank you for considering my comments.

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