

Before the
UNITED STATES COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of:

Determination of Rates and Terms for
Digital Performance of Sound Recordings
and Making of Ephemeral Copies to
Facilitate those Performances (*Web VI*)

Docket No. 23-CRB-0012-WR
(2026-2030)

**NOTICE OF SUBMISSION OF “EXHIBIT J” TO SOUNDEXCHANGE’S MOTION TO
COMPEL DISCOVERY FROM THE NATIONAL RELIGIOUS BROADCASTERS
MUSIC LICENSE COMMITTEE AND EDUCATIONAL MEDIA FOUNDATION VIA
ALTERNATIVE MEANS**

On November 12, 2024, SoundExchange, Inc. (“SoundExchange”) filed its Motion to Compel Discovery from the National Religious Broadcasters Music License Committee and Educational Media Foundation (Dkt. No. 43827, the “Motion”) and accompanying exhibits. A technical issue with the eCRB filing platform prevented the filing of SoundExchange’s Exhibit J in support of the Motion.¹ Following the procedures outlined in 37 C.F.R § 303.5(m)(1), SoundExchange contacted the Copyright Royalty Board (“CRB”) staff prior to midnight on November 12, 2024, alerting them to the issue (with copy to opposing counsel on the Motion, who were already in receipt of Exhibit J). In the ensuing days, SoundExchange worked with the CRB staff in an attempt to resolve the issue with submitting Exhibit J through eCRB, and also attempted alternative delivery through Signiant Media Shuttle, neither of which was successful. On November 21, 2024, after further consultation with CRB staff, SoundExchange submitted four copies of Exhibit J on compact disc. At the request of CRB staff, SoundExchange submits this notice to memorialize the submission of Exhibit J to the CRB.

¹ Exhibit J has been designated as Restricted Material pursuant to the *Web VI* Protective Order.

November 22, 2024

Respectfully submitted,

s/ Andrew L. Porter

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Counsel for SoundExchange

Proof of Delivery

I hereby certify that on Friday, November 22, 2024, I provided a true and correct copy of the Notice of Submission of "Exhibit J" to SoundExchange's Motion to Compel Discovery from the National Religious Broadcasters Music License Committee and Educational Media Foundation Via Alternative Means to the following:

College Broadcasters, Inc., represented by Seth D. Greenstein, served via E-Service at sgreenstein@constantinecannon.com

Educational Media Foundation, represented by Keenan P Adamchak, served via E-Service at kadamchak@wbklaw.com

George Johnson dba Geo Music, represented by George D Johnson, served via E-Service at george@georgejohnson.com

National Religious Broadcasters Music License Committee, represented by Karyn K Ablin, served via E-Service at ablin@fhhlaw.com

Public Broadcasting Entities, represented by David P Mattern, served via E-Service at dmattern@kslaw.com

Sirius XM Radio LLC/Pandora Media LLC, represented by Todd Larson, served via E-Service at todd.larson@weil.com

The National Association of Broadcasters, represented by Joseph R. Wetzel, served via E-Service at joe.wetzel@lw.com

Word Collections, Inc., represented by Eric B Goldberg, served via E-Service at eric@wordcollections.com

Signed: /s/ Andrew Porter