

Before the
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Copyright Royalty Board

In the Matter of)
)
Distribution of 2009)
Cable Royalty Funds)
)

Docket No. 2011-7 CRB CD 2009

ORIGINAL

**INDEPENDENT PRODUCERS GROUP'S
COMMENTS TO PARTIAL DISTRIBUTION OF FUNDS**

Worldwide Subsidy Group LLC (a Texas limited liability company) dba Independent Producers Group ("IPG"), pursuant to the Notice Requesting Comments to Partial Distribution of 2009 Funds, published September 6, 2011 by the Library of Congress, 76 Fed. Reg. 55122, hereby notifies the Copyright Office as follows:

IPG maintains no objection to the proposed distribution of 2009 cable royalty funds.

IPG is not a participant in the Phase I proceedings.

IPG maintains Phase II claims in the syndicated programming, sports programming, and devotional programming categories, typically as an assignee of rights. IPG asserts that a controversy exists with respect to the 2009 cable royalty funds in Phase II of the syndicated programming, sports programming, and devotional programming categories with regard to programming initially owned or controlled by those parties

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whom have assigned rights to IPG. However, IPG is not currently in a position to ascertain the value of its claims in these categories.

Respectfully submitted,



Dated: October 8, 2011

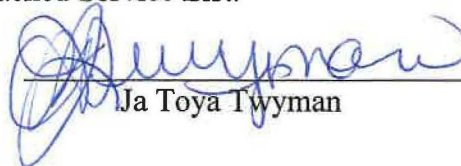
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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October 2011, a copy of the foregoing **INDEPENDENT PRODUCERS GROUP'S COMMENTS TO PARTIAL DISTRIBUTION OF FUNDS** was sent via overnight United States Postal Service Express Mail to the parties listed on the attached Service List.


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