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In re

DISTRIBUTION OF CABLE ROYALTY FUNDS	**CONSOLIDATED DOCKET NO. 19-CRB-0010 CD (2018-21)**
DISTRIBUTION OF SATELLITE ROYALTY FUNDS	**CONSOLIDATED DOCKET NO. 19-CRB-0011 SD (2018-21)**

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Program Suppliers, Public Broadcasting Service and the Public Television Claimants ("PTV"), the Canadian Claimants Group ("CCG"), the National Association of Broadcasters and the Commercial Television Claimants ("CTV"), the Joint Sports Claimants ("JSC"), Major League Soccer ("MLS"), the Music Claimants,[1] Multigroup Claimants ("MC"), and Settling Devotional Claimants ("SDC") (collectively, the "Parties") jointly request that the Judges adopt a protective order to govern the treatment of confidential materials, including competitively sensitive information, exchanged in discovery in the above-referenced cases. The Parties have agreed on the contents of a proposed order ("Proposed Order"), which is attached as Exhibit A to this joint motion.

The reasons for entry of a protective order in complex cases involving sensitive and proprietary business information are well established. The Copyright Royalty Judges ("Judges") have previously used protective orders as a means for allowing parties to "include information in their Direct or Rebuttal Cases that requires confidential treatment" and to "facilitate and expedite

[1] The Music Claimants include Broadcast Music, Inc. ("BMI"), the American Society of Composers, Authors, and Publishers ("ASCAP"), SESAC Performing Rights, LLC ("SESAC"), and Global Music Rights, LLC ("GMR").

the handling of certain discovery . . . between any party and nonparty from whom information and/or documents have been requested ("Producing Party") and any party who would receive such information and/or discovery documents ("Reviewing Party")." *Protective Order, In the Matter of Mechanical and Digital Phonorecord Delivery Rate Adjustment Proceeding*, Docket No. 2006-3 CRB DPRA (the "DPRA Proceeding") (August 13, 2007).

In the 2014-17 cable distribution proceeding, the Judges also recognized that the disclosure of personally-identifying information ("PII") of the Bortz Survey respondents constituted "Protected Material" because it is "private commercial and employment-related information … as well as confidential business information regarding the CSO entities already linked to the Bortz Survey questionnaires." *Order 27 Granting in Part and Denying in Part PTV Motion to Compel JSC to Produce Documents*, Dkt. No. 16-CRB-0009 CD (2014-17), at 38 (Feb. 15, 2023) (eCRB no. 27470). The Judges found that the disclosure of this information "to the public at large or to individuals employed in the cable, satellite or broadcast television industries . . . could harm the personal employment status or potential of the individual to whom the PII relates," and that the "potential for such individual harm arising from such wide disclosure would be sufficiently likely to inhibit the ability of JSC and Bortz to obtain like information in the future." *Id.* at 38-39. Therefore, the Judges prohibited the parties from (a) disclosing the PII of the Bortz Survey respondents to the public or to any individuals, including the principals of the parties as well as fact and expert witnesses, who were employed by or were participants in the cable, satellite or broadcast television industry; and (b) attempting to contact, directly or indirectly, any of the Bortz Survey respondents. *Id.* at 57-58.

Further, the Judges have previously issued protective orders to govern the treatment of competitively sensitive information, the disclosure of which would "result in a competitive

disadvantage to the Producer," "provide a competitive advantage to another Participant or entity," or "interfere with the ability of the Producer to obtain like information from other Participants or entities in the future." *Order 9 Protective Order*, *In the Matter of Determination of Rates and Terms for Digital Performance of Sound Recordings and Making of Ephemeral Copies to Facilitate Performances (Web VI)*, Docket No. 23-CRB-0012-WR (2026-2030) (Sept. 6, 2024).

All Parties in this proceeding agree that a protective order is necessary to restrict access to certain confidential and proprietary information, including the PII of the Bortz Survey respondents and competitively sensitive information.

Respectfully submitted,

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Dated: March 25, 2026

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Certificate of Service

I certify that on March 25, 2026, I caused a copy of the foregoing to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

/s/ Shinji Ryu
Shinji Ryu

EXHIBIT A

COPYRIGHT ROYALTY JUDGES
The Library of Congress

In re

DISTRIBUTION OF CABLE ROYALTY FUNDS	**CONSOLIDATED DOCKET NO. 19-CRB-0010 CD (2018-21)**
DISTRIBUTION OF SATELLITE ROYALTY FUNDS	**CONSOLIDATED DOCKET NO. 19-CRB-0011 SD (2018-21)**

[PROPOSED] PROTECTIVE ORDER

I. The Parties

As of [DATE], the participants in the captioned proceedings (parties) were: the Program Suppliers represented by the Motion Picture Association (MPA), the Joint Sports Claimants (JSC), the National Association of Broadcasters and the Commercial Television Claimants (CTV), the Music Claimants,[2] the Canadian Claimants Group (CCG), Settling Devotional Claimants (SDC), Public Broadcasting Service and the Public Television Claimants (PTV), Multigroup Claimants (MC), and Major League Soccer (MLS). These participants filed a Joint Motion for Entry of a Protective Order on [DATE]. The Copyright Royalty Judges (Judges) hereby grant the motion and issue this Protective Order.

II. Authority

The Judges reiterate a strong presumption in favor of the public interest in access to the records of the subject proceeding. Section 803(c)(5) of the Copyright Act nonetheless authorizes the Judges to issue protective orders "as may be appropriate to protect confidential information…." 17 U.S.C. § 803(c)(5). In prior proceedings, the Judges have issued protective orders to facilitate and expedite discovery in both rate determination and distribution proceedings.[3]

[2] The Music Claimants include Broadcast Music, Inc. ("BMI"), the American Society of Composers, Authors, and Publishers ("ASCAP"), SESAC Performing Rights, LLC ("SESAC"), and Global Music Rights, LLC ("GMR").

[3] *See, e.g.*, Protective Order, Docket No. 16-CRB-0009 CD (2014-17) (Feb. 17, 2022) (cable royalty distribution); Protective Order, Docket No. 14-CRB-0010-CD (March 31, 2016) (cable royalty distribution); Protective Order, Docket No. 2006-3 CRB DRPA (Aug. 13, 2007) ("mechanical" rate adjustment).

III. Protected Material

Section 803(c)(5) of the Copyright Act does not define "confidential information." In protection orders in prior proceedings, the Judges have defined "confidential information" to include proprietary or private business information, in any form or format, the disclosure of which would damage the party producing documents or information to another party or other parties in this proceeding (Producing Party), grant unfair advantage to the party receiving documents or information from another party in this proceeding (Receiving Party), or inhibit the ability of the Producing Party to obtain like information in the future.

For avoidance of doubt, "confidential information" includes "competitively sensitive" information, the disclosure of which to (a) individuals employed by or participating in the cable, satellite, or broadcast television industries, including but not limited to people who are working on behalf of distributors of television programming; (b) the principals of any party or claimant in this proceeding; or (c) any expert or fact witness in this proceeding who is employed by, or a participant in, the cable, satellite, or broadcast television industries (referred to herein as "Industry Participants"), would result in a competitive disadvantage to the Producing Party, provide a competitive advantage to the Receiving Party or another entity, or interfere with the ability of the Producing Party to obtain like information from other parties or entities in the future. "Competitively sensitive" information excludes (1) information, data and other resources purchased or licensed and used in copyright royalty distribution proceedings; (2) analyses or expert reports based on such information; or (3) information that is substantially similar to information produced in prior copyright royalty distribution proceedings under a "Restricted" or public designation.

For further avoidance of doubt and pursuant to 37 C.F.R. § 303.5(k), "confidential information" includes the identities and personally identifiable information (PII) of actual respondents to the cable operator surveys related to the written exhibits and testimony, the disclosure of which to Industry Participants, would damage the Producing Party, grant unfair advantage to the Receiving Party, or inhibit the ability of the Producing Party to obtain like information in the future.

The Judges adopt the foregoing definition of "confidential information" for the instant proceeding.

IV. Exemptions

Certain material is exempt from the requirements of this Protective Order, namely, documents and information that:

(1) may be found in the public records of the Copyright Royalty Board, the Copyright Office, or any other federal or state governmental agency;

(2) was, is, or during the pendency of the subject proceeding becomes, legitimately, public information; or

(3) contains an aggregate of quantitative information derived from protected materials, so long as no entity can manipulate the information in a way to reveal the protected materials.

V. Procedure

A. Production

The Producing Party shall meet the following requirements when producing (a) protected material containing PII of respondents to the cable operator surveys related to the written exhibits and testimony or (b) protected material containing competitively sensitive information.

(1) The Producing Party is responsible for marking with a conspicuous label of "**HIGHLY CONFIDENTIAL — Subject to Protective Order in Docket Nos. 19-CRB-0010 CD (2018-21) and 19-CRB-0011 SD (2018-21)**" all material that the Producing Party in good faith asserts is protected by this order and contains either competitively sensitive information or PII of respondents to the cable operator surveys related to the written exhibits and testimony ("Highly Confidential" materials). The Producing Party shall mark the Highly Confidential portions with highlighting or brackets and shall do so to the narrowest extent possible to maintain confidentiality.

(2) The Producing Party shall deliver with all Highly Confidential materials an affidavit or declaration signed under penalty of perjury listing all Highly Confidential materials and the basis for the designation.

The Producing Party shall meet the following requirements when producing protected material containing confidential information that is NOT (a) PII of respondents to the cable operator surveys related to the written exhibits and testimony or (b) competitively sensitive.

(1) The Producing Party is responsible for marking with a conspicuous label of "**RESTRICTED — Subject to Protective Order in Docket Nos. 19-CRB-0010 CD (2018-21) and 19-CRB-0011 SD (2018-21)**" all material that the Producing Party in good faith asserts is protected by this order but contains neither PII of respondents to the cable operator surveys related to the written exhibits and testimony nor competitively sensitive information ("Restricted" material). The Producing Party shall mark Restricted portions with highlighting or brackets and shall do so to the narrowest extent possible to maintain confidentiality.

(2) The Producing Party shall deliver with all Restricted materials an affidavit or declaration signed under penalty of perjury listing all Restricted materials and the basis for the designation.

The Parties produced documents during the discovery process in this proceeding prior to the issuance of this Order using the following designations (or materially similar terms): "Restricted," "Attorneys Eyes Only," and "Restricted-Order No. 27." All documents previously produced and designated "Attorneys Eyes Only" or "Restricted – Order No. 27," shall be deemed

HIGHLY CONFIDENTIAL pursuant to this Order. All documents previously produced and designated "Restricted," shall be deemed **RESTRICTED** pursuant to this Order.

B. Receipt

The Receiving Party shall maintain the confidentiality of Highly Confidential, and Restricted material. The Receiving Party, *by and through counsel of record in this proceeding*, shall execute and abide by a Non-Disclosure Certificate, substantially in the form attached to this order as "Exhibit A."

Receiving Parties are prohibited from contacting, directly or indirectly, any individual responding on behalf of a cable system to the cable operator surveys related to the written exhibits and testimony by using the PII of such responding individual produced by a Producing Party. If a responding individual is contacted by other means, Receiving Parties are prohibited from communicating with that individual, either directly or indirectly, about participation in any cable operator surveys related to the written exhibits and testimony. Nothing in this prohibition prevents a Receiving Party from conducting its own primary data collection from any cable system operators.

Counsel for the Receiving Party shall limit access to Highly Confidential materials to:

(1) outside counsel of record in this proceeding for the Receiving Party, including that outside counsel's staff required by involvement in this proceeding to view Highly Confidential material, for the sole purpose of assisting with this proceeding;

(2) litigation support contractors, including consulting experts, that the Receiving Party and counsel of record deem necessary, for the sole purpose of assisting with this proceeding and provided that the litigation support contractor is not an Industry Participant; and

(3) independent experts necessary for preparation of evidence for this proceeding, for the sole purpose of assisting with this proceeding and provided that the independent expert is not an Industry Participant.

Counsel for the Receiving Party shall limit access to Restricted material to:

(1) all persons permitted to view Highly Confidential materials; and

(2) principals of any party or claimant in this proceeding represented by the Receiving Party and employees of the same, to the extent required by their respective positions and duties to view the Restricted material to assist in the Receiving Party's presentation to the Judges;

(3) litigation support contractors and independent experts, regardless of whether they are Industry Participants.

C. Use of Highly Confidential and Restricted Materials

When a party includes Highly Confidential or Restricted material in filings with the Judges, the party shall file simultaneously:

(1) the Highly Confidential or Restricted material under seal,

(2) redacted papers for inclusion in the Judges' public record, and

(3) a "redaction log" listing for every item claimed as Highly Confidential or Restricted

  (a) identification of the document or other source including title, page number, and Producing Party;

  (b) the basis or bases for the redaction; and

  (c) a description of the material sufficient to permit any entity not entitled to view the Highly Confidential or Restricted material (Reviewing Party) to challenge the designation of the material as "Highly Confidential" or "Restricted."

Within 21 days after the conclusion of this proceeding,[4] the Receiving Party shall return to the Producing Party all Highly Confidential or Restricted material including any additional copies, notes, or records in any form reflecting the contents of the Highly Confidential or Restricted material. In the alternative, the Receiving Party may destroy the Highly Confidential or Restricted material, copies, notes, and records and shall tender to counsel for the Producing Party an affidavit or declaration under penalty of perjury verifying that they have been destroyed. However, outside counsel for the Receiving Party may, in the interest of a complete record, retain one copy of the Highly Confidential or Restricted material in original form for archive purposes only. The archive materials shall be maintained as confidential records, subject to the terms of this Protective Order.

D. Objections to the Designation of Restricted Materials

If:

(1) a Receiving Party wishes to disclose Highly Confidential or Restricted materials to any person to whom disclosure is not authorized by this Protective Order,

(2) a Receiving Party or Reviewing Party wishes to object to the designation of certain information or materials as Highly Confidential or Restricted, or

[4] The conclusion of this proceeding shall occur at the resolution of all available avenues of judicial review.

(3) a Reviewing Party seeks access to Highly Confidential or Restricted material in order to respond to a filing with the Judges,

then the Receiving Party or Reviewing Party shall first serve written notice of the proposed disclosure or objection upon counsel for the Producing Party, identifying with particularity each portion of the Highly Confidential or Restricted material at issue. Counsel for the Producing Party and the Receiving Party or Reviewing Party shall undertake negotiations to resolve disputes as to the requested disclosure or the validity of the claim to protection.

If a Producing Party declines to acquiesce in the requested disclosure or to agree that the information should not be classified as Highly Confidential or Restricted material, the Producing Party shall notify the Receiving Party or Reviewing Party in writing of the reasons therefor within three (3) business days of receipt of the written notice. A Receiving Party or Reviewing Party may then move the Judges for:

(1) modification of this Protective Order,

(2) a determination that the Highly Confidential or Restricted material at issue should not remain Highly Confidential or Restricted, and in the case of a motion by a Reviewing Party, for an order requiring production to it of the Highly Confidential or Restricted material under the same limitations that apply to a Receiving Party, or

(3) for such other ruling as is appropriate.

The moving party shall serve counsel for the Producing Party and all other parties to this proceeding with a copy of the motion. The Producing Party shall bear the burden of justifying the limitation it seeks to impose.

VI. Failure to Comply

The Judges may sanction violations of this protective order as they deem appropriate, to the fullest extent permitted by law, including exclusion of evidence obtained, developed, or handled in any way contrary to the requirements in this protective order.

SO ORDERED.

_____

Copyright Royalty Judge

EXHIBIT A

COPYRIGHT ROYALTY JUDGES
The Library of Congress

In re

DISTRIBUTION OF CABLE ROYALTY FUNDS	**CONSOLIDATED DOCKET NO. 19-CRB-0010 CD (2018-21)**
DISTRIBUTION OF SATELLITE ROYALTY FUNDS	**CONSOLIDATED DOCKET NO. 19-CRB-0011 SD (2018-21)**

[PROPOSED] NON-DISCLOSURE CERTIFICATE

I certify that:

1. I understand that certain Highly Confidential or Restricted materials provided to me in connection with the captioned proceeding are subject to the terms and restrictions of the Protective Order entered on [DATE];

2. I have received and read the Protective Order and I have no unanswered questions regarding the content or implications of the Protective Order;

3. I and any firm designated below qualify under the Protective Order to have access to Highly Confidential or Restricted materials;

4. I and any firm designated below agree to be bound by the Protective Order;

5. I understand that I shall not disclose or use the contents of the Highly Confidential or Restricted materials, and any notes, memoranda, or any other form of information reflecting the contents of the Highly Confidential or Restricted materials, other than in accordance with the terms of the Protective Order;

6. When informed by counsel for my client, I shall return or destroy any Highly Confidential or Restricted materials as provided by the Protective Order; and

7. I understand that a violation of this certificate constitutes a violation of an order of the Copyright Royalty Judges.

I represent that I am authorized to represent and sign on behalf of any Organization that is identified below and to bind agents and employees of the Organization to the terms of the Protective Order.

Date :_____

PRINT NAME: _____
Title: _____
Organization: _____

Proof of Delivery

I hereby certify that on Wednesday, March 25, 2026, I provided a true and correct copy of the Joint Motion for Entry of Protective Order to the following:

National Women's Soccer League, LLC, represented by Edward S. Hammerman, served via E-Service at ted@copyrightroyalties.com

Premier Lacrosse League, Inc., represented by Edward S. Hammerman, served via E-Service at ted@copyrightroyalties.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis, served via E-Service at smosenkis@ascap.com

Broadcast Music, Inc., represented by Brian A Coleman, served via E-Service at Brian.Coleman@faegredrinker.com

Broadcast Music, Inc., ASCAP, SESAC (joint participants), represented by Jennifer T. Criss, served via E-Service at jennifer.criss@faegredrinker.com

Commercial Television Claimants, represented by David J Ervin, served via E-Service at dervin@crowell.com

Devotional Claimants, represented by Matthew J MacLean, served via E-Service at matthew.maclean@pillsburylaw.com

Global Music Rights, LLC, represented by Scott A Zebrak, served via E-Service at carly@oandzlaw.com

Joint Sports Claimants, represented by Michael E Kientzle, served via E-Service at michael.kientzle@arnoldporter.com

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via E-Service at ted@copyrightroyalties.com

Multigroup Claimants, represented by Brian D Boydston, served via E-Service at

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Program Suppliers, represented by Lucy H Plovnick, served via E-Service at lhp@msk.com

SESAC Performing Rights LLC, represented by Timothy L Warnock, served via E-Service at twarnock@loeb.com

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