

Before the
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In the Matter of)
)
Distribution of 2011) Docket No. 2012-10 CRB SD 2011
Satellite Royalty Funds)
)

**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 2010 Funds, published January 18, 2013 by the Library of Congress, 78 Fed. Reg. 4169, hereby notifies the Copyright Office as follows:

IPG maintains no objection to the proposed distribution of 2011 satellite 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 2011 satellite royalty funds in Phase II of the syndicated programming, sports programming, and devotional programming categories with regard to programming initially owned or controlled by

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those parties 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: February 16, 2013

_____/s/_____
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