

Before the
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In the Matter of)	
)	
Distribution of 2012)	Docket No. 14-CRB-0008-CD Satellite
Royalty Funds)	(2010-2012)
)	

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

Worldwide Subsidy Group LLC (a Texas limited liability company) dba Independent Producers Group ("IPG"), pursuant to the Notice Requesting Comments to Partial Distribution of 2012 Funds and Existence of Controversies, published October 1, 2014 by the Library of Congress, 79 Fed. Reg. 59306, hereby notifies the Copyright Royalty Board as follows:

IPG maintains no objection to the proposed distribution of 2012 satellite royalty funds to parties *other than* to such group as is referred to as the "Devotional Claimants".¹ IPG represents significant claims in the devotional programming category, and for various royalty pools makes claim to the majority of devotional programming royalties. Although precedent in prior distribution proceedings requires a Phase I representative to act on behalf of all claimants within such Phase I category,² the claimants identifying themselves as the "Devotional Claimants" have historically utilized such advanced royalties to fund their own Phase II expenditures, and failed to distribute advanced royalties to any other Phase II devotional claimant, thereby violating the edict of the Judges' predecessors. In fact, the "Devotional Claimants" is overwhelmingly composed of claimants that have *never* previously partaken in a Phase II proceeding, and *never* been issued an award by the Copyright Royalty Board or its predecessors. Absent the

¹ The actual identity of such claimants does not appear in the Federal Register notice, however IPG presumes it is such claimants as have most recently identified themselves as the "Settling Devotional Claimants".

² See Docket no. 2000-2 CARP CD 93-97, Order of August 31, 2000, at pp. 4-6.

Copyright Royalty Board's restriction that any 2012 funds distributed to the "Phase I Parties" cannot be distributed to individual claimants purporting to be part of the "Devotional Claimants" in order to fund their Phase II expenditures, no distribution to the "Phase I Parties" that is intended for later distribution to the "Devotional Claimants" should be allowed.

IPG maintains claims in the syndicated programming, sports programming, devotional programming and Canadian claimant categories, typically as an assignee or agent of rights. IPG intends to participate in the Phase I proceedings in connection with its representation of claimants with devotional programming claims, and for the purpose of addressing the definition and categorization of program claims. IPG intends to participate in the Phase II proceedings in connection with its claims in the syndicated programming, sports programming, devotional programming and Canadian claimant categories. IPG asserts that a controversy exists with respect to the 2012 satellite royalty funds in Phase I and Phase II of the syndicated programming, sports programming, devotional programming and Canadian claimant categories with regard to programming initially owned or controlled by 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: October 30, 2014



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