

**Before the  
COPYRIGHT ROYALTY JUDGES  
The Library of Congress  
Washington, D.C.**



In the Matter of	)	Docket No. 14-CRB-0010-CD (2013)
Distribution of the 2013 Cable and Satellite Royalty Funds	)	Docket No. 14-CRB-0011-SD (2013)

**COMMENTS OF THE JOINT SPORTS CLAIMANTS  
ON THE EXISTENCE AND EXTENT OF CONTROVERSIES**

The Office of the Commissioner of Baseball, National Basketball Association, National Football League, National Collegiate Athletic Association, National Hockey League, and Women’s National Basketball Association (collectively “Joint Sports Claimants” or “JSC”) submit the following response to the Notice published at 79 Fed. Reg. 76396 (Dec. 22, 2014) (“Notice”). The Notice seeks comment “on the existence and extent of any controversies regarding distribution of the 2013 cable and satellite royalty funds.” Notice at 76396.

A Phase I controversy currently exists as to the share of 2013 cable and satellite royalty funds that should be allocated to each Phase I category. With respect to the existence of Phase II controversies in the sports category, JSC represents that there are no such controversies among or between JSC and any of its individual members with respect to either the 2013 cable royalty fund or the 2013 satellite royalty fund. However, JSC is aware of Phase II controversies in the sports category between Major League Soccer, LLC (“MLS”) and the members of JSC with respect to the 2013 cable and satellite royalty funds. JSC also is aware of a Phase II controversy in the sports category between Arena Football One, LLC (“AFL”) and the members of the JSC

with respect to the 2013 satellite royalty fund. JSC has settled prior Phase II controversies with MLS and AFL and will seek to do so here as well. It is possible, however, that a hearing may be necessary to resolve these controversies in the sports category among JSC, MLS, and AFL.

Dated: January 21, 2015.

Respectfully submitted,

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