

Before the
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In the Matter of)	
)	
Distribution of 2000, 2001, 2002)	Docket No. 2008-2 CRB CD 2000-2003
And 2003 Cable Royalty Funds)	(Phase II)
_____)	

INDEPENDENT PRODUCERS GROUP
REBUTTAL TO THE WRITTEN DIRECT STATEMENT
OF MPAA-REPRESENTED PROGRAM SUPPLIERS

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Attorneys for Independent Producers Group

May 15, 2013

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Worldwide Subsidy Group LLC (a Texas limited liability company) dba Independent Producers Group ("IPG") hereby submits its rebuttal testimony and exhibits in the above-captioned proceeding.

IPG will present three witnesses:

1. Raul Galaz, an employee of IPG;
2. Dr. Laura Robinson, a managing director and principal of Navigant Economics, whom has been commissioned to review the electronic records produced by the MPAA in this proceeding and conduct econometric analysis thereon;
3. Tom Moyer, a principal of Watercourse Road Productions, a television production company and distributor.

Mr. Galaz and Ms. Robinson will sponsor the exhibits referenced in and appended to their testimony.

IPG maintains it is entitled to percentages of the Phase II royalties allocated to the Program Supplier category, as more specifically set forth in the IPG Rebuttal Statement, but reserves its right to revise its claim in light of evidence presented in this proceeding.

Respectfully submitted,

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May __, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of May, 2013, a copy of the foregoing was sent by overnight mail to the parties listed on the attached Service List.

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TESTIMONY OF RAUL GALAZ

INDEPENDENT PRODUCERS GROUP
REBUTTAL TO THE WRITTEN DIRECT STATEMENT
OF MPAA-REPRESENTED PROGRAM SUPPLIERS

May 15, 2013

**REBUTTAL TESTIMONY
OF RAUL GALAZ
OF INDEPENDENT PRODUCERS GROUP**

After almost a year of preliminary proceedings, the cases of both Independent Producers Group (“IPG”) and the Motion Picture Association of America (“MPAA”) have been formally presented to the CRB. Throughout these many months, IPG has endeavored to learn what it could about the MPAA methodology and system for allocating royalties. At each turn, however, IPG has been frustrated by the fact that the MPAA has failed to produce the integrated database from which its conclusions are drawn, as well as failing to produce many of the electronic file elements that were purportedly integrated in order to create the final integrated database. Consequently, IPG has been hamstrung from any ability to test the accuracy or statistical validity of the MPAA viewer study, which remains a literal impossibility with the electronic records that were produced to IPG.

In a layman’s analogy, the MPAA has provided IPG with many of the ingredients that it used to bake its cake, but provided nothing more than a rough description of its recipe. The final product, i.e., the final integrated database, has *never been produced* by the MPAA, a fact that IPG’s expert witness, Dr. Laura Robinson, will verify and which will become evident at the oral hearings. Nor has the MPAA produced certain necessary electronic files that were asserted in written testimony to have been integrated, e.g., the MPAA’s list of “11,600” claimed works and associated claimants. Nor has the MPAA produced the electronic files utilized in order to implement certain significant processes, e.g., Dr. Gray’s regression analyses. In sum, the MPAA has denied IPG any ability to review the MPAA’s conclusions, much less reconstruct the MPAA

database which, in any event, is not IPG's responsibility to do.

Even though the MPAA has not provided IPG with many underlying electronic files compelled to be produced according to the CRB regulations, IPG has nevertheless been able to conduct research upon the electronic files that were disclosed. IPG's research reveals important information that raises fundamental questions about the MPAA methodology and renders the MPAA's statistical conclusions virtually worthless for Phase II analyses. Among the most salient discoveries of IPG, as discussed in greater detail below, are these:

- The MPAA viewer study purports to rely on the Nielsen Diary Data for four "sweeps" periods, which is then extrapolated to derive the value accorded to each and every broadcast under the MPAA viewer study. However, 76% to 82% of all broadcasts measured from 2000-2003 in the Nielsen diary data are attributed with "0" distant viewing, i.e., the data concludes that absolutely no persons were watching outside the local FCC footprint. Such result occurs despite Nielsen's measurement of broadcasts on, according to the MPAA, the most significantly distantly retransmitted stations in the U.S. - - 81, 97, 122 and 125 stations for 2000 to 2003, respectively.
- While the existence of such "zero viewing" levels is already remarkable, the variation of "zero viewing" from station to station is even more dismaying. For any given year, certain stations demonstrate as little as 35% "zero viewing", while others reflect as much as 99.9% "zero viewing". The one exception being WTBS for 2002, which was inexplicably accorded *less than 1%* "zero viewing".
- Recognizing such issue from prior proceedings, the MPAA's witness attempts to explain such phenomena by asserting that such high levels of "zero viewing" are due to Nielsen automatically attributing a "zero value" to any programming not compensable in these proceedings, e.g., network broadcasts on ABC, CBS, and NBC. However, that assertion is demonstrably disproved by data reflecting that such network-feed programming was nonetheless attributed viewing, and the fact that independent station broadcasts (those with no network feed) reflected such "zero viewing" no differently than network affiliated stations.
- As noted, because the MPAA failed to ever produce its integrated study, unlike the 1997 proceedings, IPG was unable to determine how this corrupted "zero viewing" element of the MPAA viewer study ultimately affected the viewing

accorded to any given broadcast or program.¹

- According to prior testimony from the MPAA's witness from Nielsen Media Research, broadcasts which are measured as having fewer than 5,000 viewers are already subject to "huge relative errors". IPG's research reveals that for each of the years 2000-2003, the Nielsen diary data revealed that 95% of their measured broadcasts reflected fewer than 5,000 viewers, with average viewership for entire years being as low as 1,408 viewers per broadcast. That is, by the MPAA witness' own admission, 95% of the measured broadcasts upon which the MPAA viewer study relies suffer from "huge relative errors". Such witness has also admitted in prior proceedings that it is a mistake to mix the results of Nielsen diary and meter methodologies, which is perhaps why the methodology utilized in these proceedings were utilized in the 1989 proceedings, then abandoned until now.
- Despite the stated identity of stations sampled as part of the MPAA viewer study, it can be determined that the MPAA viewing study initially sought to include more sample stations than resulted, but the existence of **100%** "zero viewing" in the Nielsen diary data required the MPAA to drop such stations from their study altogether.
- The MPAA viewer study, to the extent that it considers stations for which Nielsen diary data was applied, purposely excluded some of the most significant distantly retransmitted stations, Canadian-originated stations, then misapplied its own stated criteria of selecting those U.S. stations that had the most "Form 3" distant subscribers.

Beyond the foregoing, several significant errors additionally exist with the MPAA viewer study. The MPAA viewer study, as with the IPG methodology, attempts to apply a comparison of MPAA-claimed and IPG-claimed programming. The MPAA viewer study, however, acknowledges that if there is a conflicting claim to a particular program, it is attributed to the MPAA.² The MPAA makes such "prejudgment" despite the fact that the MPAA claimants have

¹ For example, in the 1997 proceedings IPG was able to demonstrate that the 73% overall "zero viewing" in the Nielsen diary data resulted in 82% of all broadcasts being according with a "zero value" in the MPAA viewer study, clearly discrediting the MPAA viewer study. In these proceedings, where the Nielsen diary data reflects even *higher* levels of zero viewing, 76%-82% in any given year, the logical consequence would be even higher levels of "zero value" attribution in the MPAA viewer study. Nonetheless, such measurement and expectation cannot be confirmed because the MPAA's integrated database for its study *was never produced*.

² As an example, if IPG made claim to programs constituting 10% of the value accorded under the MPAA viewer

not gone through the broadcast vetting process that IPG-represented claimants have gone through, by which an affirmative representation as to the claimant's entitlement to *a specific broadcast* is made.³ Consequently, the MPAA concludes that IPG is entitled less than 1% of the pool for most years, but misleadingly asserts that such is the value for "IPG-claimed" programs.⁴ In fact, IPG's claims are much, much more significant, but have been simply summarily excluded by the MPAA as part of its calculations. The value that the MPAA viewer study *actually* attributes to "IPG-claimed" programming cannot be discerned because, again, the MPAA's final integrated database, has *never been produced* by the MPAA.

Perhaps more dramatic, however, is the MPAA's assertion in its Written Direct Case as to the interests it represents. The MPAA witness charged with the responsibility for documenting the entitlement of MPAA-represented claimants provided written testimony that for any given year the MPAA "directly" represents approximately 100 claimants, but "directly and indirectly" represents as many as 1,400 claimants, making claim for "11,600" programs.⁵ *See* Kessler at 4, 6. Such statement is a shorthand means of expressing that many of the MPAA-

study, but the MPAA made claim to each of the same programs, the MPAA viewer study would presume that IPG had no entitlement and accords no value to IPG's claims, despite the fact that it could be IPG that rightfully has the claim, not the MPAA.

3 The MPAA viewer study relies on a purported claimant's inexact claim for programs, without consideration of the frequent existence of programs with identical names, or variations that commonly appear in agreements for the license of programming, e.g., territorial or temporal restrictions. An MPAA-represented claimant is *only* asked to confirm a particular program for a particular year. No consideration is given to redundant program titles, a claimant's control of a program for less than the full calendar year, or for broadcasts only in certain regions, certain territories, or certain stations. An accurate application requires that a claimed entitlement be on a broadcast-by-broadcast basis, as the IPG survey conducted.

4 The MPAA's attribution of value to IPG's programs is more appropriately a reflection of IPG claims that are not in conflict with MPAA claims, i.e., those claims that are altogether unopposed by the MPAA.

5 The MPAA reference to "11,600" claimed titles is misleading to the extent that it quadruple-counts titles that are broadcast in each of the years 2000-2003, a fact made evident in Kessler, Appendix C. IPG makes no such double,

represented claimants are not themselves copyright owners, but the purported “agents” of copyright owners, a fact that is borne out by the MPAA documentation. In *not one such circumstance* has the MPAA (i) entered into direct contractual privity with the actual copyright owner claimant, (ii) corresponded with such copyright owner, (iii) requested or confirmed any agreement between the agent and the underlying copyright owner, or (iv) made any effort to confirm that such relationship *actually exists*. In fact, in *all* circumstances, even the programs that are ultimately attributed by the MPAA to any of the “agent” claimants are affirmed by the unconfirmed agent, *not* the underlying copyright owner.

Specifically, in 615 circumstances relating to 4,415 claimed programs, the MPAA was unable to substantiate that it had the authority to represent the actual claimant. As a result, based upon the Judges’ ruling in this case *and* the rulings from predecessor tribunals, such program claims must be dismissed from the MPAA’s claim. No less disconcerting is that, despite the existence of a Protective Order in this proceeding, the MPAA has refused to produce *any* agreement between itself and its represented claimants *without such significant redaction as to render such documents meaningless*.

Notwithstanding the foregoing criticisms, the seminal question is whether the MPAA’s proposed viewer study is even relevant to the considerations that are before the Judges, as it fails to focus on the appropriate buyer in a hypothetical market – the cable system operator.⁶ Viewer

triple, or quadruple counting.

6 See, e.g., 75 Fed.Reg. 57063, 57066, 57069, 57070 (Sept. 17, 2010), Docket No. 2007-3 CRB CD 2004-2005 (“Moreover, that there are factors other than subscriber growth considerations which may also be at work in influencing the demand for distant signal stations, does not change our finding that the Bortz survey focuses on the appropriate buyer in the hypothetical market – i.e., the cable operator.”)(“In short, we find that the George Ford advertising approach offers no helpful insight into the relevant hypothetical market or into the behavior of the relevant buyer in that hypothetical market – i.e., the cable operator.”)

ratings do not equate with cable system subscribership or other net revenue considerations of a cable system operator. No evidence exists for such proposition, and prior attempts to draw such connection have repeatedly been rejected in Phase I proceedings. *See infra*. Without any evidence of such connection, the MPAA witnesses summarily assert that such connection exists, and do so without regard to such obvious issues as a “displacement” - - when a program has cognizable ratings, but may only be displacing ratings from another broadcast being carried by the cable system - - likely not resulting in any more subscribers.

Aside from the errors with its choice to measure the wrong buyer, errors in the application of its own methodology, errors in the data that is central to the MPAA viewer study, the MPAA’s understatement of IPG-claimed programming, and the MPAA’s gross overstatement of its legitimately represented claimants and programs,⁷ the MPAA’s amended written direct statement attempts to dismiss IPG’s value as less than 1% of the value of Program Supplier pool. In reality, IPG represents 159 independent producers in these proceedings, most for each of the four years, and the MPAA represents approximately 100 parties each year. IPG remains unable to assess the value of IPG-represented claims under the MPAA viewer study because the MPAA integrated study *was never produced*, but remains able to assess the MPAA’s claims under the IPG methodology, the recalculated results of which appear at the conclusion of this rebuttal statement.

⁷ As noted, the MPAA asserts that it represents “11,600” titles in these proceedings, though many titles have been quadruple-counted, once for each year in which broadcast occurred. The MPAA asserts that it represents “directly and indirectly” up to 1,400 claimants per year, though MPAA has not produced a single instance of correspondence with most of those entities, nor confirmed their programming from them.

ARGUMENT

I. THE MPAA HAS FAILED TO PRODUCE ITS INTEGRATED STUDY, AND MANY OF THE ELEMENTS THEREOF. THE JUDGES MUST THEREFORE PRECLUDE INTRODUCTION OF ANY TESTIMONY OR EVIDENCE RELIANT THEREON.

One of the central difficulties that IPG experienced throughout the discovery phase of this proceeding was the MPAA's failure to produce electronic files underlying the MPAA viewer study. Specifically, the MPAA's integrated study, i.e., the end of the study compilation of data reflecting the MPAA's ascribed values, *has never been produced*. Obviously, such integrated study would reflect whatever value the MPAA had attributed to a particular program or broadcast, however no such electronic file appears in the electronic files produced by the MPAA. Moreover, several electronic files expressly referenced in the testimony of MPAA witnesses were not produced, and from what has been produced, IPG can deduce that certain processes that were said to be followed were not followed.⁸

In order to avoid any accusation that IPG was simply not sufficiently adept at reviewing the MPAA electronic files, IPG engaged an expert witness for the purpose of reviewing the electronic files produced by the MPAA, as well as for the purpose of an econometric analysis of the MPAA viewer study. No different than IPG, IPG's expert witness reached the identical conclusion regarding the MPAA-produced files, as reflected in the testimony of Dr. Laura

⁸ As just one example, the testimony of Kelvin Patterson indicates that Reznick Group P.C. examined the broadcast station logs provided by Tribune Media, then excluded program titles that the MPAA had indicated were not compensable in these proceedings, e.g., network feed broadcasts. *See* Patterson Testimony at p.2. Notwithstanding, the electronic files that are purported to be the product of this exclusion still contain broadcasts of network feed programming. Hard copy documents authored by Mr. Patterson and produced two months following the original production then contradict the description of process set forth in Mr. Patterson's testimony, and identifies the exclusion of noncompensable broadcasts occurring at a different stage. *See* MPAA doc. nos. 05868-05869.

Robinson of Navigant Economics, and submitted as part of IPG's rebuttal statement.

Consequently, *none* of the assertions made in the MPAA witnesses' testimony can be verified as accurate, and *none* of the processes that MPAA witnesses have asserted took place in the creation of the MPAA viewer study can be verified. Even the MPAA's most basic statements as to the percentage of value that the MPAA has attributed to MPAA-claimed programming versus IPG-claimed programming, cannot be verified. For these evident breaches of the MPAA's discovery obligations, IPG contends that the MPAA viewer study, and any conclusions derived therefrom, cannot be considered by the Judges.

A. IPG can establish the existence of numerous examples of missing electronic files by means of a flowchart comparing MPAA witness testimony and the documents actually produced in connection with such testimony.

According to the MPAA's written direct statement, the MPAA secured Tribune Media data for between 81 and 125 television stations distantly retransmitted between 2000 and 2003, and Nielsen diary measurements for the distant viewing of broadcasts for such stations. The Nielsen diaries, however, were ostensibly obtained for only four "sweeps" periods, each of which is four weeks in length, i.e., for only 16 of 52 weeks in each given year. Coupled with information obtained from Cable Data Corporation as to the number of distant households capable of receiving the distant signal, the MPAA purports to create the "distant rating" for any broadcast on such sampled stations.

The MPAA also obtained Nielsen "local ratings" data from Nielsen meter measurements taken year round, from 125 sampled stations that are different from the 81-125 stations for which Nielsen diary data is obtained. Now, with both the "local ratings" and "distant ratings" ostensibly in its possession, the MPAA purports to run regression analyses to fill in the blanks for

eight (8) months of distant viewing for which it has absolutely no data. According to the MPAA, the regression analyses compare the relation between the local ratings and the distant ratings for those four months in which the MPAA has Nielsen diary data, and applies the relationships therein to the eight months in which no distant data exists.^{9 10}

Irrespective of the distribution methodology that the MPAA *says* it constructed, the MPAA's electronic files and discovery responses tell a different story.¹¹ *See* IPG Exh. R-2. The MPAA's response to IPG's request for underlying electronic files, particularly those relating to the last steps in the process and the MPAA's integrated study, was that such electronic files either did not exist or were irrelevant and not subject to production. Specifically, IPG's request for electronic files underlying Dr. Gray's statements as to his "calculation of distant ratings", and "attribution of relative value", were asserted to have been based *solely* on Dr. Gray's "professional knowledge and experience", or were objected to as "beyond the scope of any witness' testimony or exhibits", and "irrelevant and not calculated to lead to the discovery of admissible evidence". *See* IPG Exh. R-3, at paras. 75, 76, 85.

For this reason, IPG has constructed a flow chart that tracks the statements made in the testimony of MPAA witnesses Patterson and Gray, and compares those statements with the electronic files produced (or not produced) as supporting such statements. *See* IPG Exh. R-4. As

⁹ A diagram that visually represents the MPAA's description of its methodology is attached as IPG Exh. R-1.

¹⁰ Although not clarified in the MPAA written direct statement, IPG presumes that because the stations for which the MPAA acquired Nielsen *distant* viewing data are significantly different than the stations for which the MPAA acquired *local* ratings data, the asserted "local ratings/distant ratings" relationship that is said to exist is not on a broadcast-by-broadcast basis, but is much more generalized. Otherwise, no broadcast-by-broadcast comparison can logically be stated to exist.

¹¹ A listing of the electronic files produced by the MPAA is attached hereto as IPG Exhibit R-2.

noted therein, the MPAA failed to produce no fewer than nine (9) electronic files necessary for the creation of its viewer study, although many more were likely necessary in order to accomplish the processes asserted to have taken place. These missing electronic files include, without limitation:

- the electronic files reflecting the exclusion of three different categories of noncompensable programming from two different sets of electronic records;
- the electronic files containing the “11,600” MPAA-represented titles for integration into two co-existing databases (diary stations and local ratings stations);
- the electronic files implementing “regression analyses” in order to calculate distant viewing during eight (8) non-sweeps months for which no distant viewing data otherwise exists;
- the electronic file merging Nielsen *diary* data with Tribune media data;
- the electronic file merging Nielsen *meter* data with Tribune media data;
- the electronic file integrating Nielsen diary data and Cable Data Corporation distant household information, for the calculation of distant ratings; and
- the final product - - **the MPAA’s integrated study.**

Moreover, the MPAA failed to produce other significant documents that have been required to be produced in prior distribution proceedings, particularly relating to the Nielsen data that the MPAA asserts is a necessary element to the MPAA viewer study.¹²

¹² For instance, in prior proceedings the MPAA was required to produce data reflecting how many diaries Nielsen utilized in order for the MPAA to *project* the number of viewing households. In the 1997 proceedings, it was revealed that a single viewing household may be the basis for Nielsen’s projection of 10,000 households, and for these proceedings, no information was produced as to Nielsen’s *projected* viewing for each of 5.9 Million quarter-hour broadcasts (approximately 1.5 Million for 2000, 1.3 Million for 2001, 2.1 Million for 2002, and .9 Million for 2003). Other proceedings have additionally required that the MPAA produce data reflecting the location and placement of diary households, and any caveats or qualifications placed upon the accuracy of the data produced by Nielsen, including relative sample error factors and confidence intervals.

What becomes immediately apparent from review of IPG's flowchart is that the MPAA either did not actually perform the analyses that the MPAA asserted were performed, or simply elected to withhold such electronic files from IPG in order to avoid scrutiny. Irrespective of which possibility has occurred, the MPAA must be precluded at this juncture of the proceedings from now claiming to possess any of the electronic data that it asserts that it has compiled, but never produced, or introducing any results derived therefrom, whether through testimony or documents. When such failures have been catalogued in past cable royalty distribution proceedings, the offending party has not been permitted to flout its discovery obligations; rather, its case has been limited by obstructionist actions. Consequently, the Judges must preclude any evidence of the MPAA viewer study, irrespective of the testimony of the MPAA witnesses as to any processes that *might* have been followed, or what results *might* have resulted.

II. THE MPAA VIEWER STUDY ERRS IN ITS ASSUMPTION THAT NIELSEN-MEASURED HOUSEHOLD VIEWING EQUATES TO THE MEASURE OF "VALUE" FOR ANY PROGRAM RETRANSMITTED BY A CABLE SYSTEM.

Although it is tempting to first address the mechanics by which the MPAA viewer study logistically relies on Nielsen-measured diary data for its *projection* of distant viewing, and the validity of the Nielsen diary data that is relied on (*see infra*), the initial question that must be asked is "why" would the MPAA measure household viewing? That is, "why" would the MPAA equate "household viewing" to "program value" for purposes of cable distribution proceedings?

In prior proceedings, the MPAA's measurement of viewer ratings was found irrelevant to these proceedings. In the 1998-1999 Phase I proceedings, the Librarian adopted in full the determinations of the CARP, holding:

"The devaluation of the Nielsen study is a result of the Panel's consideration of

the hypothetical marketplace. . . . [E]vidence that demonstrated how cable operators valued each program category was, in the Panel’s view, the best evidence of marketplace value. . . . The Nielsen study was not useful *because it measured the wrong thing.*”

69 Fed.Reg. 3606, 3613 (Jan. 26, 2004), Docket No. 2001-8 CARP CD 98-99. (emphasis added)

Time and time again, the Judges and predecessor Copyright Royalty Tribunal and CARP have determined that household viewing is not the measure of value. Rather, the “buyers” that are to be considered for purposes of cable distribution attribution of value are the cable system operators that select which broadcast stations are to be retransmitted on their cable system.^{13 14}

Notwithstanding, two MPAA witnesses, Marsha Kessler and Dr. Gray, summarily assert that viewer ratings equate to program value for these proceedings because viewer ratings are all that are considered by a cable system operator in order to determine which broadcast *stations* to retransmit.¹⁵ No authority, data, or information, is cited for this leap of faith which, as

13 See 75 Fed.Reg. 57063, 57066, 57069, 57070 (Sept. 17, 2010), Docket No. 2007-3 CRB CD 2004-2005 (“Moreover, that there are factors other than subscriber growth considerations which may also be at work in influencing the demand for distant signal stations, does not change our finding that the Bortz survey focuses on the appropriate buyer in the hypothetical market – i.e., the cable operator.”)(“In short, we find that the George Ford advertising approach offers no helpful insight into the relevant hypothetical market or into the behavior of the relevant buyer in that hypothetical market – i.e., the cable operator.”)

14 Moreover, the compulsory license that is afforded to cable system operators automatically precludes a television program owner from negotiating a license for the retransmission of its television program, thereby denying such program owner the ability to enter into an arms-length negotiation for a license of its property. That reality, coupled with the fact that a cable system operator is statutorily precluded from cherry-picking which programs it desires to retransmit, and can only retransmit a station *en toto*, any allocation of program value must include some factor based on a valuation of the *station* on which a program broadcast appears. That is, no broadcast can be deemed worthless absent each and every broadcast on the same retransmitted station being deemed worthless, because selection of a particular station is an all-or-nothing proposition for the cable system operator. No recognition of such fact appears in the design of the MPAA viewer study which, both theoretically and practically, ascribes a zero value to *millions* of broadcasts, and thousands of programs (see *infra*).

15 Specifically, and without substantiation or citation, the following explanations are given by MPAA witnesses as to “why” the MPAA viewer study seeks to rely on viewer ratings, rather than the choices actually made by a cable system operator:

“Viewing, as measured by Nielsen, is the predominant standard by which all television programming is

mentioned, contradicts the findings from multiple prior cable distribution proceedings.¹⁶ In fact, neither Ms. Kessler or Dr. Gray appear to have any credentials to opine on such subject. By contrast, IPG's rebuttal witness, Tom Moyer, a television producer/syndicator with hands-on experience, attests that the use of viewer ratings is not even a necessary aspect for securing the *primary* transmission of programming for certain genres of programming, much less securing the *secondary* transmission by cable system operators, which are at issue here.

To clarify, the MPAA witnesses just *assume* that higher program "viewing" equates to higher appeal to cable system operators, and therefore higher system subscribership. No consideration is given to the possibility that a particular broadcast, may garner lower viewership than a competing broadcast, but actually result in greater *aggregate* viewership for the cable system. The near-obvious concept of "displacement" demonstrates that one broadcast, while generating high viewer ratings, might just be displacing viewer ratings that would otherwise exist for a different broadcast appearing on the same cable system, thus failing to increase the

commercially evaluated." Kessler Test. at p.10.

"Audience size, which is determined through program viewership, is the primary goal of programmers and therefore the most direct measure of a program's relative value. From the [Cable System Operator's] perspective, the more a program attracts subscribers to watch and keep coming back to watch, the more valuable the program is to the CSO's net-revenue maximizing goal of retaining and growing subscriber count. From the subscriber's perspective, relatively low viewership of a given program reflects the value ascribed to that program by cable subscribers *and CSOs*." Gray Amended Testimony at p.12 (emphasis added).

16 See 75 Fed.Reg. 57063, 57066, 57069, 57070 (Sept. 17, 2010), Docket No. 2007-3 CRB CD 2004-2005 See also, 69 Fed.Reg. 3606, 3609 (January 26, 2004), Docket No. 2001-8 CARP CD 98-99 ("[T]he CARP arrived at a significant conclusion. . . the Panel determined that . . . the Nielsen study 'does not afford an independent basis for determining relative value.' [cites] The Panel arrived at this conclusion because it determined that the Nielsen study did 'not directly address the criterion of relevance to the Panel,' to wit: '[t]he value of distant signals to [cable system operators] * * * in attracting, and retaining subscribers.'").

subscribership to that particular cable system.¹⁷

Moreover, the MPAA witnesses and the MPAA viewer study do not discriminate between ratings – a rating is a rating is a rating. That is, viewership attributed to the 18-34 demographic is not distinguished from viewership by gender, age, ethnicity, etc., all of which are known to reflect different purchasing habits. In prior proceedings, the MPAA has tried to develop a thesis that the MPAA viewer study reflects the “advertising value” of retransmitted programming. Despite overwhelming information presented in the 1989 CRT cable proceedings that specific demographic ratings are what drive advertising values - - a fact that now borders on common knowledge - - the MPAA still provides no demographic ratings data and fails to support its claim other than by overly broad generalizations.¹⁸ Ironically, the MPAA’s rationalization for use of ratings, i.e., ratings reflect advertising value, would render the conclusion that 76%-82% of all distant retransmitted broadcasts in the United States are without *any advertising value*.¹⁹ *See infra*.

17 For example, what if a cable system operator had two choices as to which station to retransmit? Retransmitted Station A contains a children’s program broadcast, and retransmitted Station B contains a talkshow for adults, and the Station A broadcast would have twice the viewers as the Station B broadcast. Now consider that the cable system operator has an abundance of children’s programming available (e.g., Cartoon Network), but no adult talkshow programming. The Station A broadcast, while generating high viewer ratings, might just be displacing viewership of other children’s programming, while the Station B broadcast, while generating lower viewer ratings, might be creating *aggregate* viewership to the cable system that is higher than what results from the Station A broadcast. *See, e.g.*, IPG Exh. R-5.

18 In the 1989 CRT proceeding, the 1993-1997 CARP proceeding, and the 1998-1999 CARP proceeding, similar criticism was voiced by opposing claimants and the MPAA failed to provide any substantive response. The MPAA’s continued assertion of this theory without support independently warrants ignoring the use of ratings information to justify an award in this proceeding.

19 Dr. Gray’s logical misstep for not considering such distinction is further reflected by Dr. Gray’s assessment that “programming at issue within the Program Suppliers category in this Phase II proceeding is more homogenous than all of the programming at issue in the Phase I proceeding.” Gray Amended Testimony at p.10. That is, according to Dr. Gray, an infomercial, a situational comedy, a children’s animated cartoon are more “homogenous” than programming appearing in other Phase I categories, such as the Canadian Claimants Group category or devotional category.

In sum, looking at the “view from 10,000 feet”, the Judges must ask whether the MPAA viewer study, which attempts to measure household viewing, is even relevant to the considerations that are before the Judges. Prior panels have already determined that viewer ratings are not relevant because it “measures the wrong thing”, and do not equate with cable system subscribership or other net revenue considerations. No evidence exists for the predicate upon which the MPAA viewer study relies, and prior attempts to draw such connection have repeatedly been rejected in Phase I proceedings, as they should be here.²⁰

III. THE MPAA’S CLAIM DEPENDS UPON STATISTICALLY UNRELIABLE DATA AND MAKES WILDLY UNSUBSTANTIATED PROJECTIONS OF HOUSEHOLD VIEWING.

This is only the *second* cable royalty distribution proceeding in which the MPAA has disclosed any of the underlying data supporting its program-by-program allocation of cable retransmission royalties, and the identical infirmities remain as appeared in the MPAA’s prior analyses.

Since Congress created the cable compulsory license in 1978, the MPAA has held itself to be the representative of “Program Suppliers.” From this vantage, and commencing in the 1979 proceeding, the MPAA devised a methodology for the distribution of copyright royalties, a

Dr. Gray’s statement fails to appreciate that programming in the Canadian Claimants Group and devotional categories *used to be* part of the Program Suppliers category. In fact, programming in the Canadian Claimants Group category is indistinguishable from the Program Suppliers category other than the fact that it is derived from Canadian-originated signals of Canadian-owned programming. Infomercial programming (currently in the Program Suppliers category) is more akin to devotional programming because the producers of both programming types must purchase their airtime from broadcast stations, unlike traditional entertainment programming that is part of the Program Suppliers category.

²⁰ For example, even as early as in the 1989 Phase I proceedings, it was established that sports programming, while garnering only 11% of the viewer ratings, was entitled 23.8% of the Basic Fund, and 26% of the 3.75% fund. 57

methodology which relies heavily upon ratings information provided by Nielsen Media Research. In Phase I proceedings, the MPAA has advocated the Program Suppliers' entitlement against seven other broad categories of programming, including sports, devotional, commercial and public television, music and Canadian programming. While the CRT long ago acknowledged the value of the MPAA Nielsen viewing study as a "starting point" for purposes of comparing the value of retransmitted programming in the aforementioned broad program categories, the significance and value of Nielsen data has diminished considerably, and is now generally disregarded.²¹

In no Phase II Program Supplier distribution proceeding has the CRT, CARP or CRB ever concluded that the MPAA formula could or should be applied mathematically to specific programs of other Phase II claimants. Quite significantly, prior to the 1997 Phase II proceedings that were adverse to IPG, the MPAA was never even compelled to provide documentation underlying its program-by-program allocation of royalties. After being required to do so in the 1997 proceedings, numerous issues were revealed that led the Librarian of Congress to conclude that "the results generated by the MPAA's sample survey are so unreliable that they cannot support an assessment of IPG's and MPAA's claims in this proceeding." *See* 66 Fed.Reg. 66433 (Dec. 26, 2001), Docket No. 2000-2 CARP CD 93-97.

Even though the MPAA has withheld crucial electronic files attributing values to specific

Fed.Reg. 15286, 15302-15304.

21 Per the CARP that was convened for the 1998-1999 Phase I proceedings, and the Librarian of Congress: "An examination of prior Phase I cable royalty distributions reveals that it is difficult, if not impossible, to determine precisely what evidentiary weight was given the Nielsen studies. It is clear, however, that the role of the Nielsen study, almost preeminent in the beginning, has eroded considerably throughout the years. . . . The Panel in this proceeding did nothing more than continue this trend and did so with a full explanation of its reasons." *See* 69 Fed. Reg. 3606, 3614 (Jan.26, 2004), Docket No. 2001-8 CARP CD 98-99.

programs in these proceedings, i.e., the MPAA integrated study, and has withheld electronic files applying processes to its data, what data has been disclosed reveals the fundamentally unreliable nature of the Nielsen data upon which the MPAA's entire claim is inextricably based.

A. The MPAA Viewer Study is Statistically Flawed and Without Any Rational Justification Because of the Prevalence of “Zero Viewing”.

Seemingly, the single most impressive number in the MPAA case is the conclusion that the MPAA is entitled 99% or more of the Program Supplier royalties for programs claimed by its “approximately 100” represented claimants, whereas IPG's total share on behalf of 159 claimants is less than 1%.²² Gray Amended Testimony at p.28.

Impressive as the MPAA's figures are designed to be, the truth is that the data upon which it relies is so flawed, and so unreliable, that the Judges cannot use it to make any allocation in this proceeding. Even though the MPAA has refused to provide Nielsen data on the number of households and the locations of those households in the viewing study, information required to be produced in prior cable distribution proceedings, IPG has reviewed the raw Nielsen data and determined that *the most impressive, indeed overwhelming, figure in the MPAA case is ZERO (“0”)*.

i. “Zero” Viewer Analysis of Nielsen Quarter Hour Data for All Measured Broadcasts.

The MPAA viewer study purports to rely on the Nielsen Diary Data for four “sweeps” periods, which data affects the value accorded to *each and every broadcast* under the MPAA viewer study. Approximately 5.9 Million quarter-hour broadcasts were measured by Nielsen

²² As noted above, the MPAA has not provided the electronic files that would allow IPG and the Judges to verify these stated percentages.

diaries. When IPG began to study the Nielsen diary data that is utilized as the measure of distant viewing, IPG discovered that in the column marked “wght_house_proj” i.e. the number of distant households *projected* to be tuned to a station during a specific quarter hour during the sweeps periods, there was a disproportionately large number of “0” entries. Since IPG had received the Nielsen data electronically, IPG was able to tabulate the number of entries in which viewership to programs was projected to be “0.”²³

What the analysis established was dramatic. **In 76% to 82% of all broadcasts measured from 2000-2003 in the Nielsen diary data, Nielsen recorded “0” for the number of households projected to be watching a station.**²⁴ That is, according to Nielsen, in 76%-82% of the time absolutely no persons are watching the sampled retransmitted stations outside the local FCC footprint area. Such result occurs despite Nielsen’s measurement of broadcasts on (according to the MPAA), the most significantly distantly retransmitted stations in the U.S. - - 81, 97, 122 and 125 stations for 2000 to 2003, respectively.

The MPAA is aware of this damning information. In the 1997 cable proceedings, it was revealed that the Nielsen data reflected 73% “zero viewing”, and the Librarian appropriately focused extensively on the fact that there was no explanation provided for this evident departure

23 It should be noted that IPG’s “zero viewing” analysis of the Nielsen diary data was performed despite the fact that several categories of information were evidently deleted prior to the MPAA’s production to IPG. Specifically, the MPAA produced a legend of all the categories of information ostensibly appearing in the Nielsen diary data, an electronic file titled “Nielsen File Format”. Such legend reflects thirteen (13) categories of information, all of which appeared in Nielsen diary data produced to IPG in the 1997 proceedings. Notwithstanding, each of the Nielsen diary data files produced to IPG only included eight (8) categories of information, from which IPG could at least deduce the omission of categories Quarter Hour, Market Code, Day of Week, and Week. According to Dr. Gray’s written testimony, the identification of such information for any given broadcast was integral to his “regression analyses”, yet it was removed from the electronic files produced to IPG.

24 See IPG Exh. R-6.

from reality. See 66 Fed.Reg. 66433, at 66449-66450 (Dec. 26, 2001), Docket No. 2000-2

CARP CD 93-97. According to the Librarian, which cited the CARP determinations *verbatim*:

“We conclude that of the eight deficiencies we have noted in the MPAA’s distribution [methodology], this “zero” viewing hours deficiency is, by far, the most egregious. The evidence offered by MPAA to explain this perceived deficiency in its methodology was less than enlightening. Mr. Lindstrom, who is not a statistician, clarified that attribution of “zero” viewing does not mean that no persons were watching, only that no diaries recorded viewing, and that any suggestion to the Panel that no viewing occurred would reflect a misunderstanding of the data. But then he stated that the “zero” viewing hour information consists of pieces of data that are imprecise; that they are among a series of estimates that may be either high or low; that such individual quarter hour entries have little usefulness; but that they aggregate up to an accurate result, and “the more imprecise bricks you throw in the pile, the more accurate the overall number is going to be.”

Accepting this and other testimony of Mr. Lindstrom at face value, we find that it does not even begin to explain the enormous discrepancies described above regarding the crediting of “zero viewing hours. There is little if any evidence in this record that these high credits of “zero” viewing hours were offset in 1997 by credits of excessively high units of viewing hours. Thus, we are left with a record that more than merely suggests that the MPAA methodology is significantly defective in the manner in which it credits “zero” viewing hours.”

Id. at 66449-66450.

Among the extensive comments provided by the Librarian, the Librarian concluded:

“In the future, if MPAA continues to present a Nielsen-based viewer methodology, it needs to present convincing evidence, backed by testimony of a statistical expert, that demonstrates the causes for the large amounts of zero viewing and explains in detail the effect of the zero viewing on the reliability of the results of the survey. In addition, MPAA needs to take steps to improve the measurement of broadcasts in the survey to reduce the number of zero viewing hours, thereby increasing the reliability of its study.”

Id. at 66450.

The MPAA is evidently cognizant of the “zero viewing” issue, as MPAA witnesses Paul Lindstrom and Dr. Gray both address the existence of such characteristic in their written

testimony. Notwithstanding, the MPAA did not heed the directive of the Librarian. When IPG requested that the MPAA produce any documents underlying Dr. Gray's testimonial explanations for the "zero viewing", the MPAA responded that there were "no responsive documents", and that Dr. Gray's comments were based on his "professional knowledge and experience." *See* IPG Exh. R-3 at para. 66.

Initially, it is rather remarkable, if true, that the MPAA did not run any analyses in order to address the "zero viewing" issue, however that was the MPAA's discovery response and, apparently, the MPAA's statistics expert has conducted no analysis thereon. It is also remarkable that the levels of "zero viewing" have significantly *increased* with each addition of broadcast stations to the MPAA viewer study, when the MPAA was directed to take steps to "reduce the number of zero viewing hours".

ii. "Zero Viewing" Analysis on a Station by Station Basis.

It is additionally telling that the "zero" viewing percentages vary significantly from station to station among the stations included as part of the MPAA viewer study. While every single station in the MPAA viewer study has a huge percentage of quarter hours with no recorded viewing, the stations fall in a widely divergent range between 35% and 100% "zero" viewing for all stations (with one exception, *see* *infra*). *See* IPG Exhs. R-6 and R-7. For the years 2000 to 2003, 79 of 83 stations, 98 of 101 stations, 121 of 124 stations, and 124 of 126 stations,²⁵ recorded no viewing whatsoever for more than 50% of the measured quarter hours. For 2000 to 2003, the number of stations having "zero viewing" for more than 90% of all their program

²⁵ The number of aggregate stations referenced is greater than the number of stations ultimately appearing in the MPAA viewer study precisely because certain stations were dropped from the study after it was determined that they recorded **100% "zero viewing"** across all "sweeps" periods, i.e., for four months out of the particular year.

quarter hours equaled 17, 24, 37, and 39 stations, respectively. That is, for each addition of a station to the MPAA viewer study, the number and percentages of “zero viewing” grew significantly.

In truth, the only station with a statistically insignificant percentage of “zero viewing” is one station, for one year - - WTBS for 2002. Less than 1% of its measured broadcasts (199 instances out of 21,504 measured broadcasts) recorded no viewing. *See* IPG Exh. R-7 at p.8 Nor can this extraordinary differential simply be explained by the greater number of distant subscribers to WTBS, as might have been the case when WTBS was a “superstation”, as WTBS was ranked 529th out of 931 distantly retransmitted stations for 2002 (according to number of distant cable subscribers).

As regards various “superstations”:²⁶

<u>Station</u>	<u>Zero Viewing</u>	<u>Distant Subscribers</u>
WWOR-TV	84% (18,190 instances out of 21,504)	0.4 Million
KTLA-TV	69% (14,874 instances out of 21,504)	0.6 Million
WSBK-TV	68% (14,651 instances out of 21,504)	0.5 Million
WGN-TV	66% (14,214 instances out of 21,504)	32.7 Million
WPIX-TV	51% (10,591 instances out of 21,504)	2.1 Million

What this means, plain and simple, is that there is no correlation between the number of distant cable subscribers and the levels of “zero viewing”. Even if such were the case, it would not excuse the wildly divergent levels of “zero viewing” that appear station to station. Still, and just from a common sense standpoint, how is it possible that 66% of the broadcasts of WGN Chicago, with 32.7 Million distant subscribers, can measure that no distant subscriber viewers

26 For ease of example, only 2003 figures appear herein.

exist for 66% of its broadcasts?²⁷ The Nielsen diary data makes no sense unless it is acknowledged that the Nielsen diaries are simply too few in number to obtain an accurate read of distant viewing, an almost obvious conclusion that admits the unreliability of the Nielsen diary data for purposes of the MPAA viewer study.²⁸ These distortions go to the heart of the MPAA viewer study, rendering it wholly unreliable.

iii. The MPAA's asserted explanation for the vast "zero viewing" percentages can either be affirmatively disproven, or are based on sheer speculation.

It should be underscored that when addressing this knowingly problematic "zero viewing" issue in his testimony, Mr. Lindstrom, who is not an expert in statistics, proffers some opinions and explanations.

"The appearance of these "zero viewing" instances is consistent with what I would expect to find in a custom analysis of viewing to distant signals by cable subscribers, for at least two reasons.

First, it is important to recognize that Nielsen's custom analysis excluded all distant viewing to programs that are not compensable in this proceeding. This included distant viewing to ABC, CBS, and NBC network programs and programs that were not simultaneously broadcast on both WGN's local feed and WGN's satellite feed (known as WGN-A). Where noncompensable programs aired, Nielsen's custom analysis properly reported a zero viewing value.

Second, the amount of actual viewing minutes to certain distant signals is very small. Where the viewing minutes to particular distant signal programs were so small as to be statistically insignificant, Nielsen's custom analysis would assign a zero viewing value."

Lindstrom Testimony at p.6.

²⁷ The very reason that WGN is a "superstation" is in order for it to obtain the maximum amount of exposure of its programming, thereby allowing WGN to sell advertising time to sponsors as though it were a network with 99% "clearance" throughout the United States. Obviously, that is inconsistent with the MPAA viewer study concluding that 66% of the time, no one is watching WGN.

As to Mr. Lindstrom's first explanation for the "zero viewing" instances, i.e., that Nielsen attributed a "zero value" in each instance of noncompensable programming, Mr. Lindstrom's statement is simply incorrect. Attached hereto as IPG Exh. R-8 are the results of a query that I ran against the Nielsen diary data which segregated network feed broadcasts for each of ABC, CBS and NBC broadcasts. I then ranked such broadcasts according to their measured viewing, largest to smallest, and then printed out the first page of the resulting list. As is immediately evident, not only do network feed broadcasts *remain* in the Nielsen diary data against which IPG's "zero viewing" analysis has been made, but the network feed broadcasts have been accorded measured viewing. *See* column 8, reflecting "wght_house_proj".

In order to further illustrate the inaccuracy of Mr. Lindstrom's explanation, IPG's station-by-station analysis addressed above, IPG Exh. R-7, identifies those stations that are "Independent" as opposed to network affiliated. If Mr. Lindstrom's explanation were accurate, i.e., that network feed broadcasts are being automatically accorded a zero value, then broadcast stations that were network affiliated would have a higher incidence of "zero viewing" than independent stations. However, as demonstrated by IPG Exh. R-7, there is no bunching of network-affiliated stations at the higher end of the "zero viewing" spectrum. Rather, the network-affiliated stations are spaced no differently than Independent stations as to the frequency of "zero viewing" instances.

Mr. Lindstrom further explains that, at least for WGN, the high percentage of "zero viewing" is attributable to those instances in which WGN's local feed is not simultaneously broadcast on WGN's satellite feed. However, if Mr. Lindstrom's statement were accurate, then

28 This is not to say that the Nielsen diaries are unreliable for *all* purposes, only for the purpose of measuring

the “zero viewing” instances would have to at least equal the number of non-simulcast broadcasts. IPG’s analysis, however, reveals that for 2000, 2001 and 2002, the number of “zero viewing” instances is *less* than the number of non-simulcast broadcasts, thereby disproving Mr. Lindstrom’s explanation for WGN.

Mr. Lindstrom’s final explanation for the high incidence of “zero viewing” is really not much of an explanation. It indicates that where the measured viewing is statistically insignificant, Nielsen automatically attributes a zero value. Such “statistically insignificant” measurements would occur where an insufficient number of diary measurements were recorded due to an inadequate number of diaries to sufficiently measure actual viewing, which is precisely the common sense explanation for the high “zero viewing” percentages that is asserted by IPG, i.e., *too few diaries exist*. That is, Mr. Lindstrom’s explanation, while acknowledging that “zero viewing” occurs when a statistically insignificant measurement is obtained, does not address the obvious issue as to “why” a statistically insignificant measurement occurred - - *because no one was watching WGN 66% of the time, or because there are too few Nielsen diaries to sufficiently measure the actual viewing*. The answer to this question is obvious.

To reiterate the finding of the CARP and the Librarian in the 1997 proceedings, Mr. Lindstrom “is not a statistician”. Nevertheless, even if he were, Mr. Lindstrom has offered no evidentiary support for his explanation. Again, when IPG asked for any documents based on Mr. Lindstrom’s last and final explanation for the existence of “zero viewing”, the MPAA’s response was that there were “no responsive documents”, and that the statement was based solely on Mr. Lindstrom’s “professional knowledge and experience.” *See* IPG Exh. R-3, at para.53.

distantly retransmitted viewing.

iv. Prior Testimony of Nielsen’s Paul Lindstrom confirms that the Nielsen data (and, therefore, the MPAA viewer study) lacks statistical validity for purposes of ascribing viewing on a program-by-program basis.

According to the prior testimony of Paul Lindstrom, single broadcasts for which Nielsen has projected less than 5,000 household viewers have a relative error factor of 89%; those under 10,000 viewers have a relative error factor of 63%. *See* Exh. IPG9x from 1993-1997 Designated Testimony, Docket No. 2000-2 CARP CD 93-97.

Notwithstanding, IPG has calculated that the Nielsen diary data that is the primary component of the MPAA viewer study projects average viewing of *only* 1,682, 1,408, 4,597 and 2,494 household viewers to each quarter-hour broadcast in the MPAA study from 2000 to 2003, respectively. *See* IPG Exh. R-9. Moreover, for the years 2000-2003, the percentage of measured broadcasts that had fewer than 5,000 projected viewers was a staggering 93%, 95%, 95% and 96%, demonstrating from yet another perspective that a huge percentage of the Nielsen viewer projections were unreliable. *See* IPG Exh. R-10. Comparable relative error factors for the 2000-2003 study were not provided by the MPAA in discovery. Notwithstanding, and as was testified by Mr. Lindstrom in both the 1990-1992 and 1993-1997 Cable Royalty Distribution Proceedings, it is a reasonable assumption that calculations for programs that might be measured only a few times during the course of the “sweeps weeks”, are “subject to huge relative errors.” *See* 66 Fed.Reg. at 66448-49.

The fact that the MPAA’s own witness associates such high error factors to program-by-program attribution of household viewers demonstrates a key failing of the MPAA viewer study, again warning against blind adherence to the conclusions derived therefrom and presented by the

MPAA's written direct statement.

v. The corruption of a necessary and significant element of the MPAA viewer study corrupts any results derived from the MPAA viewer study.

It must be appreciated that *each and every* attribution of value that has been accorded to *each and every* broadcast appearing in the MPAA viewer study is intricately and heavily affected by the Nielsen diary data measurements. The reported viewing from the Nielsen diary data for any given broadcast during the four "sweeps" months is what dictates the value that the MPAA viewer study has accorded to such broadcast, *and* every similarly situated broadcast appearing between the "sweeps" months for which no distant viewing data exists, *at all*. The "zero viewing" instances are so prevalent, that the MPAA had to drop stations from their analysis because such stations reflected 100% "zero viewing", i.e., no measured distant viewing for even one broadcast during the "sweeps" months.

It does not take a statistical expert to make the observation that the Librarian made in the 1997 proceedings:

"Contrary to MPAA's assertions, we believe that the zeros mean something. They cannot mean "nothing" We make a layperson's observation that when you aggregate lots of zeros, the result is still zero."

66 Fed.Reg. at 66450.

In sum, the prevalence of "zero viewing" in the Nielsen diary data is so profound, and so dramatically varying from station to station, that the only reasonable conclusion is that such data is unreliable. The Nielsen diary data necessarily affects each and every attribution of value in the MPAA viewer study, and necessarily renders the MPAA viewer study unreliable as to each and every attribution of value. In the vernacular of esteemed statisticians, "garbage in, garbage out."

IV. THE MEANS BY WHICH DR. GRAY ATTRIBUTED DISTANT VIEWING VALUES FROM HIS “REGRESSION ANALYSES” IS NOT DISCERNIBLE FROM EITHER DR. GRAY’S TESTIMONY, OR THE ELECTRONIC FILES PRODUCED BY THE MPAA. THE MPAA VIEWER STUDY APPEARS TO RELY MUCH MORE HEAVILY ON THE NIELSEN DIARY DATA THAN DESCRIBED IN THE WITNESS TESTIMONY.

According to the MPAA witness testimony, Nielsen provided distant viewing data for four “sweeps” periods, occurring in February, May, July and November.²⁹ This statement is made both by Paul Lindstrom and Dr. Gray. Lindstrom Testimony at p.4, Gray Testimony at p.15. According to Dr. Gray, in order to fill in the blanks for those eight (8) months in which absolutely no distant viewing data exists, Dr. Gray runs various “regression analyses” that rely on a comparison of “local” ratings data for the time period being addressed, e.g., Tuesday at 10:00 p.m., to the “distant” ratings that Dr. Gray has calculated for the four “sweeps” months.³⁰

IPG finds Dr. Gray’s description of the “regression analyses” unclear, and at odds with those MPAA electronic files that were produced. Although not clarified in the MPAA written direct statement, IPG presumes that because the stations for which the MPAA acquired Nielsen distant viewing data are significantly different than the stations for which the MPAA acquired local ratings data, the asserted “local ratings/distant ratings” relationship that is said to exist is not on a broadcast-by-broadcast basis, but is much more generalized. Otherwise, no broadcast-by-broadcast comparison can logically be stated to exist. As noted, IPG cannot discern such distinction from the electronic files produced by the MPAA, as the MPAA’s integrated viewer

²⁹ As should be appreciated, the Nielsen distant viewing data is not a reflection of the actual measured viewing, but is rather “projected” viewing. For example, the measurement of a single household watching a distantly retransmitted station may be “projected” to be the equivalent of 7,000 households viewing, depending on such factors as the station that is being watched, and the demographics of the single viewing household.

³⁰ A diagram that visually represents the MPAA’s description of its methodology is attached as IPG Exh. R-1.

study *was never produced*. Therefore, the means by which the regression analyses were actually applied, remains a mystery.³¹

Notwithstanding, in the course of IPG's analysis of the "zero viewing" appearing in the Nielsen diary data, IPG made an interesting observation. Although more than one of the MPAA witnesses represent that Nielsen diary data exists for only four "sweeps" months, that is not what appears in the Nielsen diary data that was produced by the MPAA.

As reflected in IPG's "zero viewing" analysis, IPG ran "zero viewing" comparisons on a station-by-station basis. *See* IPG Exh. R-7. IPG identified for each station, for each year, the number of broadcasts appearing in the Nielsen diary data, as well as the number of instances in which there was no measured viewing. Review of IPG Exhibit R-7 reflects that various numbers repeatedly occur in the "Aggregate Instances" column, and they are typically the numbers "21,504", "16,128", "13,440", "10,752", and a handful of other numbers. This count represents the number of quarter-hour broadcasts in the Nielsen diary data, and equals 32 weeks, 24 weeks, 20 weeks, and 16 weeks, exactly. That is, IPG noticed and confirmed that the Nielsen diary data actually attempts to measure broadcasts outside of the four months of "sweeps" periods.

What this calculation demonstrates is two-part. First, it demonstrates another departure from the MPAA's stated methodology of only using four months of Nielsen distant viewing diary data for each station, when *much* more is actually being used. Second, and while Dr. Gray's "regression analyses" remains subject to criticism for the leap of faith it makes as to some yet-to-

31 Multiple questions exist that cannot be answered: What if the distant viewing for a broadcast is a Nielsen-measured "0" for a "sweeps" period, as is 76%-82% of all distant measurements? How is the "local rating" to "distant rating" ratio calculated for the adjacent "non-sweeps" periods? What if there are different program types broadcast during the "sweeps" and "non-sweeps" period, e.g., sports programming versus syndicated entertainment programming? The answers to such questions are not clarified by the MPAA witness testimony.

be-clarified relationship between local ratings and distant ratings, it appears that the MPAA viewer study has a much greater dependence on the Nielsen diary data than was explained. That is, while Dr. Gray's "regression analyses" is already a concern to the extent it tries to fill in blanks where absolutely no distant viewing data exists, if the MPAA viewer study is actually relying much more heavily on the Nielsen diary data measurements, and not just filling in the blanks with extrapolation, then the MPAA viewer study is *still* inserting measurements of "zero" in 76%-82% of the instances, which might be just as bad or worse than application of the "regression analyses".

In any event, the MPAA's own witness has previously testified as to the error of mixing methodologies into a single study. He testified to such fact in *both* the 1989 proceedings, and the 1993-1997 proceedings. As noted by the CRT:

"Mr. Lindstrom stated that it was invalid to mix metered viewing with diary viewing."

See 57 Fed.Reg. 15286, 15288 (April 27, 1992), Docket No. CRT 91-2-89CD. Moreover, such concept was reaffirmed in the 1997 cable proceedings, wherein Mr. Lindstrom testified:

"Just in general, if you were looking at household information, it would, in my opinion, not be a good idea to mix methodologies."

See IPG-designated testimony of Lindstrom, Tr. at 1478-1480 (Feb.6, 2001), Docket No. 2000-2CARP CD 93-97.

In sum, what is one to believe? Are the Judges to believe that the MPAA viewer study fills in the blanks for eight months of distant viewer ratings from yet-to-be-clarified "regression analyses" reliant on unreliable data, or that less than eight months of distant viewing information

was determined from same source of unreliable data? Are the Judges to believe that from a methodological standpoint, it is *now* acceptable to mix meter and diary data? Given the obvious infirmities with other aspects of the MPAA viewer study, it may just not matter.

V. THE MPAA'S CLAIM TO 99% OF THE PROGRAM SUPPLIER ROYALTIES IS BASED ON THE SUMMARY EXCLUSION OF IPG CLAIMS.

Following the identification of IPG's claimed programming in IPG's written direct statement, the MPAA filed an amended written direct statement. Therein, MPAA witness Dr. Gray concluded that he had compared the MPAA's programming with "IPG-claimed" programming, and pursuant to the MPAA viewer study had concluded that the MPAA was entitled 98.4%, 99.6%, 99.6% and 99.7% of the 2000-2003 cable royalties for the Program Supplier category, respectively. Gray Amended Testimony at p.28.

Throughout Dr. Gray's amended testimony he provides a variety of comparisons between the MPAA's programming and "IPG-claimed" programming in order to rationalize the relative values that he has ascribed. Charts comparing the "number of unique programs aired", the "number of program retransmissions", the "total volume of compensable programming" and "viewer shares of Program Supplier programming" are provided. In each case, the MPAA programming figures dwarf the IPG programming figures.

A simple reason exists for such skewed results - - in any instance in which Dr. Gray found a conflicting claim to a program title, Dr. Gray attributed it to the MPAA. Such fact is acknowledged in Dr. Gray's testimony. *See* Gray Amended Test. at pp.4, 24. Nevertheless, and rather surreptitiously, Dr. Gray's charts and data all refer to "IPG-claimed" programming, not "IPG programming that has been arbitrarily reduced because of a conflicting MPAA claim".

To demonstrate, if IPG made claim to program broadcasts constituting 10% of the value accorded under the MPAA viewer study, but the MPAA made claim to the same programs, the MPAA viewer study would presume that IPG had no entitlement, whatsoever, and would accord *no value* to IPG's claims. Further, Dr. Gray's analysis would falsely indicate in such circumstance that there was no "IPG-claimed" programming, even though IPG-claimed programming evidently exists. IPG understands this issue, as IPG was faced with the same dilemma when presenting its data, but logically based its attribution of ownership to IPG-represented claimants on a comparison of the IPG and MPAA identification of claimed broadcasts.³²

Stark differences exist in the means by which IPG and the MPAA confirmed their claimed broadcasts. IPG painstakingly did so; the MPAA barely did so at all. Specifically, IPG's process involved identifying the specific titles for each and every compensable broadcast within IPG's 200-231 station survey. *Then*, each IPG-represented claimant was required to provide a list of programs for which it retained copyright. *Then*, IPG generated an extensive list of each and every broadcast of the programs appearing on the underlying copyright holder's program list. *Then*, IPG required the IPG-represented claimant to go through the extensive broadcast list and affirm or deny whether they retained the right to the *exact* broadcast.

³² To be certain, some of the conflicts exist because of contractual issues. In no fewer than ten instances, the MPAA is making claim to an IPG-represented claimant vis-à-vis the ostensible agent of such claimant, whereby the MPAA has yet to even communicate with the underlying claimant. *See* IPG Exh. R-11. In another ten instances, the MPAA entered into an agreement subsequent to IPG's engagement, and asserted that the MPAA agreement "trumps" the IPG agreement, despite no legal support for such contention. *Id.* In certain of those circumstances, e.g., Litton Syndication, Ward Productions, while acknowledging the existence its contract with IPG, the claimant has renounced any contractual obligation to IPG and breached its agreement. In other circumstances, e.g., United States Olympic Committee, there is no indication that the claimant agrees with the MPAA position giving no significance to the claimant's agreement with IPG.

In short, IPG recognized that numerous programs exist that have the identical title as other programs, and recognized that copyright holders might have temporal or territorial restrictions on their rights. That is, a claimant's right to make cable royalty claims normally does not start and end on a calendar year break. Rather, they follow distribution seasons, and an endless number of possibilities exist according to which a claimant may be entitled to cable retransmission royalties attributable to a program one day, but not the next, or entitled to retransmission royalties originating from broadcasts on one station, but not another. All of these possibilities are addressed by IPG's requirement that the IPG-represented claimant specify which specific *broadcasts* to which they are making claim, not merely a listing of program titles.

By contrast, the MPAA's method of verification was much more crude. Quite simply, the MPAA sent its represented claimants (more often, merely an "agent" claiming entitlement) a list of program titles that *the MPAA had prepared* from its own analysis,³³ and requested the MPAA-represented claimant to execute a "certification" that lists the program titles controlled by the claimant. Such "certifications" do not account for different programs with the same name, make no distinction as to temporal restrictions, and make no distinction as to territorial restrictions. Moreover, the MPAA's approach is rife with "moral hazard" in that, having received the "certification", the recipient *already knows* that the MPAA has not attributed any other party with control of the listed programs, and that accession to the MPAA's suggestion of

³³ In many circumstances, the MPAA clearly erred significantly, determining from its own analysis that the MPAA-represented claimant controlled scores of programs to which they were not entitled. *See, e.g.*, IPG Exh. R-12. IPG asked for all documents based on Ms. Kessler's statement that the MPAA had conducted "independent research" to determine which of "11,600" programs were controlled by MPAA-represented claimants, and was informed that Ms. Kessler's statements related thereto were based solely on her "industry knowledge and experience." IPG Exh. 3 at para. 20. Unless Ms. Kessler's "industry knowledge and experience" extends to the exact ownership details of 11,600 programs, such "independent research" is nothing more than conjecture.

ownership will yield additional royalties.

In fact, the “certifications” produced by the MPAA are themselves at issue for the simple reason that each and every one that was produced was heavily redacted, despite the issuance of a Protective Order in this case. No different than the ruling of the Judges that precluded IPG’s introduction at the preliminary hearing of email correspondence wherein the entirety of the prior email string was not presented, the MPAA “certifications” cannot be considered by the Judges because of such documents’ extensive redaction.³⁴ *See, e.g.*, IPG Exh. R-12.

Consequently, IPG’s criteria for including a broadcast on IPG’s list of claimed broadcasts involves an extensive vetting, while the MPAA’s process involves nothing short of rudimentary matching of a single criteria – program title. As such, for Dr. Gray to automatically attribute the MPAA with entitlement to programs that are in conflict, even though IPG-represented claimants have made much more specific identification of particular broadcasts, is simply unreasonable. At minimum, Dr. Gray should not have misrepresented the extent of IPG’s claim, and should have articulated the value of programming (under the MPAA viewer study) that it was automatically attributing to the MPAA.

³⁴ By contrast to the IPG emails that were excluded from evidence, the MPAA has never produced the unredacted versions of the “certifications”, and IPG and the Judges remain unaware of what information has been omitted by the MPAA from such documents.

VI. THE MPAA HAS ASSERTED THE AUTHORITY TO REPRESENT 615 CLAIMANTS, AND 4,415 PROGRAMS FOR WHICH IT CAN PROVIDE NO SUBSTANTIATING DOCUMENTATION. ALL REMAINING DOCUMENTATION IS SUBJECT TO HEAVILY REDACTED REPRESENTATION AGREEMENTS.

As noted in my introductory comments, the MPAA has asserted the authority to represent 615 claimants from 2000 to 2003 for which it cannot produce a single shred of evidence.³⁵ Specifically, the MPAA has only entered into agreements with the purported “agents” of these claimants, many of which profess to represent *hundreds* of copyright owners.

The significance of this development cannot be understated. As part of the preliminary hearing process, the MPAA challenged IPG’s representation of claimants in all circumstances in which an executed contract could not be located, even if anecdotal evidence existed that the underlying copyright owner had engaged IPG (e.g., correspondence, etc.). In each of the instances challenged herein by IPG, the MPAA’s documentation is one step further removed from what IPG presented to the Judges and was the basis of dismissal.

In 615 circumstances relating to 4,415 claimed programs, the MPAA’s documentation confirms that the MPAA-represented party is merely an “agent” representing the interests of a third party copyright owner claimant. Exemplars of multiple “certifications” are attached hereto as IPG Exh. R-13, reflecting the signatory’s status as an “agent”, and reflecting how such identical signatory will confirm the claimed programs for multiple underlying copyright holders. Nevertheless, in *not one* such circumstance has the MPAA confirmed (or sought to confirm) that the underlying copyright owner actually engaged the MPAA-represented “agent”, whether by

³⁵ IPG requested documents supporting Marsha Kessler’s representation that the MPAA “directly or indirectly” represents these copyright holder claimants, and was simply referred to the “July claims” that were filed by “agents”. See IPG Exh. 3 at para.10.

production of an agreement or correspondence, etc. In *not one* such circumstance has the MPAA entered into an agreement directly with the underlying copyright owner. In *not one* such circumstance has the MPAA even communicated with the underlying copyright owner. The MPAA has, literally, just taken the word of multiple acknowledged “agents” that they represent the interests of, in some cases, *hundreds* of underlying copyright owners, without more. Similarly, the MPAA has obtained the lists of programs to be claimed from the ostensible agent, without any input from the actual claimant.

As a result, the MPAA can establish no direct contractual privity with the underlying copyright owner, nor can the MPAA establish the existence of privity between the purported “agent” and the underlying copyright owner. Following the CRB’s preliminary hearing, guidance was provided as to the requisite documentation necessary to establish authority to represent an underlying copyright owner in these proceedings. Applying the *identical* rulings to the MPAA as were applied to IPG, *as well as* the rulings of predecessor tribunals, the MPAA claim to represent such 615 underlying claimants and 4,415 programs must be dismissed for lack of any substantiating documentation, or corroborating evidence.³⁶

Moreover, despite the existence of a Protective Order in this proceeding, the MPAA has refused to produce *any* agreement between itself and its represented claimants *without significant redaction*. *See, e.g.*, IPG Exh. R-15. Literally, in each and every instance, the MPAA has redacted significant portions of its agreements, engaging in the identical actions of which it

³⁶ IPG has attached as IPG Exh. R-14 a list of the claimants purported to be represented by the MPAA, but for which no agreement or anecdotal evidence has been presented. IPG will be producing to the MPAA an electronic file containing the list of programs associated with such claimants, but is not producing the 315-page printed document thereof due to its size.

accused IPG. Such accusations against IPG ultimately resulted in the wholesale exclusion of several items of correspondence between IPG and its represented claimants, however one major difference exists. The exclusion of IPG's correspondence as a means of substantiating IPG's claims was made irrespective of the fact that IPG had produced the challenged correspondence to the MPAA in full, and months prior, whereas the MPAA has not produced in discovery anything more than heavily redacted copies of its agreements.

As noted, a similar issue arose in the last litigated Phase II proceedings, when the MPAA also refused to produce all of the documents substantiating its authority to make program claims.

There also, IPG objected, and the response of the Librarian was to agree:

“MPAA points out there is no regulation that requires that it put into evidence program certifications. This is correct. However, MPAA is requesting us to accept its methodology as the means of determining the division of royalties in this proceeding. Unless MPAA can prove that it properly represents all the programs it claims on the alpha list, we cannot verify that MPAA's methodology is being correctly applied. *We cannot assume that the copyright owners of all the programs claimed by MPAA are actually represented by MPAA simply because it says so.*”

See 66 Fed.Reg. 66433, 66450 (Dec. 26, 2001), Docket No. 2000-2 CARP CD 93-97. (emphasis added).

What can the MPAA establish about its contractual entitlement to represent claimants in these proceedings? The answer is “practically nothing”. Its produced agreements are so heavily redacted, that the reader can discern nothing about the territory, term, or a plethora of other potential issues.

No different than was imposed on IPG in connection with the preliminary hearings, the Judges are compelled to exclude any agreement asserted by the MPAA to be the basis for its

entitlement to represent a claimant in these proceedings. That includes each and every agreement produced by the MPAA in these proceedings.

VII. THE MPAA HAS GROSSLY OVERSTATED THE NUMBER OF ROYALTY-BEARING PROGRAMS IT REPRESENTS IN THESE PROCEEDINGS.

MPAA witness Marsha Kessler asserts in her testimony that the MPAA-represented claimants are making claim for “approximately 11,600” titles. Kessler Testimony at p.6. Appendix C to Ms. Kessler’s testimony, a 112-page document, purports to list such titles, arranged on a year-by-year basis.³⁷

As becomes immediately apparent, Ms. Kessler’s assertion is based on fluff. First, she has multiple counted any program appearing in more than one of her calendar year lists. As such, any title appearing in each of the 2000-2003 lists that are part of Kessler Appendix C, is “quadruple counted”.

Further, the titles appearing on Kessler Appendix C are *not* titles for which compensable broadcasts have actually been identified. Rather, they are titles that the MPAA-represented claimants might purport to control, irrespective of whether any retransmitted broadcasts compensable in these proceedings even exist. Such fact was verified from the MPAA’s own electronic files.

IPG reviewed the MPAA electronic file “Detail of Diary Matches”, which purports to identify each broadcast of an MPAA-claimed title that appears in the raw Tribune Media data that was acquired by the MPAA (data that the MPAA ordered as part of its review of 81-125

³⁷ Although requested, the MPAA did not produce the electronic file containing its “11,600” titles. As such, IPG was required to re-type the four titles lists of 11,600 titles contained in Kessler Appendix C.

stations for which Nielsen Diary data also exists). What was immediately apparent is that a vast number of titles appearing on the Kessler Appendix C list of “11,600” titles are not present in the raw Tribune Media data ordered by the MPAA. To be certain, the raw Tribune Media data still includes noncompensable broadcasts, e.g., network feed broadcasts, so even if an MPAA-claimed title from Kessler Appendix C appears therein, it still might not be due compensation from these proceedings.

Nevertheless, IPG discovered the following:

<u>YEAR</u>	<u>MPAA CLAIMED TITLES</u>	<u>ACTUAL ## APPEARING IN MPAA DATA</u>
2000	2684	1758
2001	2927	1965
2002	3537	2064
2003	2446	1562

In fact, when adjusting for the “multiple counting” of programs, the MPAA can only establish that it has 4,613 unique programs, compared to the 1,297 unique programs claimed by IPG. To be certain, when IPG indicated in its written direct statement that it represented 1,297 programs, it was not “quadruple counting” programs broadcast in each of the years 2000-2003. Moreover, unlike the MPAA, IPG did not include programs that IPG-represented claimants controlled, but for which there was no compensable retransmissions in the U.S.

The point of the foregoing is to enlighten the Judges as to the artificial efforts being made by the MPAA to portray its represented claims as massive, and IPG’s represented claims as miniscule. As one might expect when two parties each represent over one hundred claimants, one of which represents the largest television producers in the world and the other representing

smaller independent producers, there is a disparity in the number of titles that appear in their respective catalogues. However, the disparity is far from the levels represented by the MPAA.

VIII. THE MPAA SAMPLE STATIONS SELECTION IS NOT AS REPRESENTED, FAILS TO MEET THE MINIMUM REQUIREMENTS ARTICULATED BY PRIOR TRIBUNALS, AND ARBITRARILY EXCLUDES THOUSANDS OF PROGRAMS FROM CABLE ROYALTY DISTRIBUTION.

A. The Criteria for the MPAA's Sample Station Selection Remains a Mystery.

Ms. Kessler stated that the stations used in the MPAA viewer study sample were selected after reviewing the Form 3 Statement of Account data acquired from Cable Data Corporation. Kessler Testimony at p.11. Interestingly, however, Ms. Kessler does not actually identify the criteria she used for selecting stations as part of her sample, other than that she excluded Canadian, Mexican and public stations because they are “not at issue in this proceeding.”

As an initial matter, Ms. Kessler is simply wrong about her premise that broadcasts on Canadian and Mexican stations are not at issue. As the Judges are aware, an issue has arisen in these proceedings as to whether the Phase I categorizations that have been privately stipulated to by various parties carry the authority of law. Nevertheless, *even accepting* the privately stipulated definitions, Ms. Kessler's exclusion of broadcasts on Canadian and Mexican stations is a misapplication thereof.

Specifically, the MPAA-stipulated definition of “Program Suppliers” includes programming that is broadcast by “at least” one U.S. station. *See* IPG Exh. R-16. Further, “Canadian Claimants” expressly excludes Canadian-originated broadcasts of programs “owned by U.S. copyright owners”. These definitions, therefore, would seemingly exclude the Phase I categorization of any Canadian-originated broadcast of a program owned by a U.S. copyright

owner if the program were not also broadcast on “at least” one U.S. station, but it is specifically the lack of comprehensiveness that makes the stipulated definitions so objectionable. No reason can be discerned, at all, for the summary exclusion of programming appearing on Mexican stations, unless Ms. Kessler has made the flawed presumption that a program appearing on a Mexican station will never also appear on a Spanish-language U.S. station.

To be certain, Canadian-originated stations account for some of the most significant distantly retransmitted broadcasts in the U.S. and they were summarily excluded by Ms. Kessler. *See* IPG Exh. R-17. In fact, CBUT Vancouver is the third most retransmitted station in the U.S. (based on distant subscribers) for each of the years 2000-2003, typically with more than 900,000 distant subscribers. *Id.* By 2003, three of the top eleven stations are Canadian, and five of the top 25 stations. While not nearly as significant, no basis existed for excluding Mexican-originated stations.

Nevertheless, in prior proceedings Ms. Kessler and other MPAA representatives have stated that their threshold for including a station in their sample study is based on a requisite number of Form 3 distant cable subscribers, and that is the suggestion of Ms. Kessler’s testimony here. However, if that were accurate, the stations selected by the MPAA for use in its study would be ranked from largest to progressively smaller, with no stations overlooked, and no errant stations included that are not part the stations above a particular threshold. Such has not occurred.

Specifically, IPG has analyzed the stations selected by the MPAA for use in its study of stations with corresponding Nielsen Diary data, and been unable to determine what, if any, criteria was utilized by the MPAA for the selection of stations from 2000 to 2003. *See* IPG Exh.

R-17. From 2000 to 2003, and based on distant subscribers, stations ranked as low as 379th, 771st, 771st, and 591st appear in the MPAA station list, while stations ranked as high as 36th, 68th, 65th, and 77th, are excluded (not including the multiple Canadian stations). As a simple review reveals, no rhyme or reason exists, other than that it appears as though the MPAA purposely selected several stations that fall far outside its previously stated intention of basing its selection on the most significant distantly retransmitted stations.

The identical issue has repeatedly arisen in prior cable distribution proceedings, giving rise to the suggestion that the MPAA is “cherry picking” which stations to include in its study. As noted by the CRT as early as the 1989 proceedings:

“[I]n choosing the stations to be studied, it appears that some were excluded even though they met the objective threshold established by MPAA itself. While MPAA’s witness was able to explain some exclusions, others could not be explained.”

See 57 Fed.Reg. at 15300.

No differently, in the 1993-1997 proceedings, the MPAA’s selection of stations left the CARP scratching their heads. Despite asserting the existence of a strict criteria of selecting stations that had a minimum number of distant cable subscribers, the MPAA was revealed to have inexplicably deviated from such criteria. As noted by the Librarian:

“[W]e cannot determine from the record whether MPAA’s failure to apply its 90,000 subscriber criteria was deliberate, or the result of oversight. What is clear is that MPAA’s failure to apply its chosen selection criteria consistently further undermines our confidence in the accuracy of the results generated by its sample survey. In the future, when presenting a methodological survey, MPAA needs to rigorously adhere to its announced standards and parameters for the survey.”

See 66 Fed.Reg. 66433, 66450 (Dec. 26, 2001), Docket No. 2000-2 CARP CD 93-97.

Evident from IPG’s analysis is that the MPAA either has no particular criteria for

selecting stations, or has purposely selected only certain stations that are beneficial to the MPAA's claim, and obfuscated its selection process by only suggesting that such process was based on the number of Form 3 distant cable subscribers. Irrespective, neither possibility reflects well on the MPAA viewer study.

B. The MPAA has inexplicably relied on an inadequate number of stations sampled, thereby arbitrarily excluding entitled programs from compensation in these proceedings.

Not only are there unexplained discrepancies in the station sample selection, but compared to prior years, the MPAA has also deliberately chosen to reduce its station sample dramatically. After being criticized in the 1983 cable proceedings for having too small a sample,³⁸ the MPAA increased the number of stations measured from 101 commercial stations in 1983, to 127 in 1989. In 2000, for no apparent reason, the MPAA retreated to a sample actually smaller than one used seventeen (17) royalty years earlier. The decision not to maintain (if not increase) the number of sample stations, despite the vast increase in retransmitted stations during such timeframe,³⁹ raises serious issues with the MPAA's reliance on the relevance of the MPAA viewer study from prior cable proceedings.

The following demonstrates the contrast with prior years:

³⁸ In the 1983 proceeding, the MPAA sought to include all U.S. stations with 95,000 Form 3 subscribers, which included 101 commercial stations. The MPAA "conceded" within its proposed findings that the use of such stations cannot be perfectly projected to other stations. 51 Fed.Reg. 12792, 12794 (April 15, 1986), Docket No. CRT 84-1 83CD.

³⁹ "During 1983, there were 622 U.S. broadcast television stations which were carried on a distant signal basis by at least one cable system." 51 Fed.Reg. at 12794. By contrast, for 2000 to 2003, there were 895, 876, 930 and 970 distantly retransmitted stations, i.e., a 43%-56% increase in the number of distantly retransmitted stations.

<u>Royalty Year</u>	<u>Commercial Stations in MPAA viewer study</u>
1983	101
1986	113
1989	127
2000	81
2001	97
2002	122
2003	125

For 1983 through 1989 data, *see* 51 Fed.Reg. 12792, 12794 (April 15, 1986), Docket No. CRT 84-1 83CD; 57 Fed.Reg. 15286, 15288 (April 27, 1992), Docket No. CRT 91-2-89CD.

One can only speculate why the MPAA would opt to *reduce* the number of sampled stations in light of prior CRT criticism regarding the insufficiency of the sample size, and why the MPAA would not opt to random sample the stations that it directs Nielsen to study, also a criticism of the MPAA viewer study. From an intuitive standpoint, however, little doubt exists that selection of only the most sought after stations in a limited number of television markets, as opposed to random sample of a greater number of stations, will create a skewed result that will favor only the most influential (i.e., largest) syndicators and producers. Such fact is aptly demonstrated by a comparison of the number of unique programs that appear in the raw Tribune data obtained by the MPAA, versus the raw Tribune data obtained by IPG.

For any given year applicable to these proceedings, IPG obtained Tribune Media data for between 200 and 231 distant retransmitted stations. By contrast, the MPAA viewer study relied on only 81 to 125 stations. While the difference is already significant, an effect is occurring that is not immediately evident.

U.S. syndication has several broadcast tier levels. Consequently, increasing the number

of broadcast stations in a sample will not necessarily result in a proportionate increase in the number of unique programs appearing in a survey. For instance, in the case of the MPAA's sampled stations for 2000 (81 stations), the raw Tribune data obtained by the MPAA reflects 3,034 unique programs. By contrast, IPG's sampled stations for 2000 (223 stations), while almost a three-fold increase in stations, reflects 17,655 unique programs - - an increase of 480%. As such, just for calendar year 2000 IPG's study has allowed for an additional 14,621 programs, the broadcast of which actually contributed to the cable royalty pool, to be potentially compensated rather than excluded from these proceedings. *See* IPG Exh. R-18, p.2.

While the MPAA has argued that its sampling covers, for example, 75% of the distant subscribers for 2000, it fails to appreciate that it is arbitrarily excluding *thousands* of programs that are responsible for generating the cable royalty pool from any likelihood of distribution therefrom. This was the basis for criticism of the MPAA viewer study over twenty years ago, and will remain a chronic infirmity until the MPAA includes significantly more stations in its study than it has for any given year thusfar.

IX. THE 2000-2003 MPAA VIEWER STUDY IS VERY SIMILAR, AND ALMOST IDENTICAL, TO THE MPAA VIEWER STUDY SUBMITTED IN THE 1989 CABLE DISTRIBUTION PROCEEDINGS, YET SEVERAL OF THE SAME INFIRMITIES EXIST.

What is immediately recognizable is that this is not the first occasion that the MPAA has offered a study comparable to the study presented in these proceedings. In the 1989 cable distribution proceedings, the MPAA offered a virtually identical study for Phase I purposes. *See* 57 Fed.Reg. 15286 (April 27, 1992), Docket No. CRT 91-2-89CD. Such proceeding was the first introduction of the Bortz Survey and, ironically, many of the same issues apparent in the

current MPAA viewer study were issues in that broad-stroke Phase I proceeding.

Specifically, and the same as here, the MPAA offered a study based on Nielsen data, whereby the MPAA attempted to “fill in the blanks” for non-sweeps distant viewing by comparing ratios with local viewing. *See* 57 Fed.Reg. at 15290, for a description of the 1989 MPAA study. For many of the same reasons articulated by IPG herein, all four of the other Phase I parties - - Joint Sports Claimants, National Association of Broadcasters, PBS, and Devotional programmers, all disagreed with the use of the Nielsen study.

A. Relevance of Viewer Ratings.

No different than IPG has set forth above, the Copyright Royalty Tribunal took issue with the practical issue with relying on viewer ratings:

“[The Nielsen study] improved the analyses greatly and gave the [1983] Tribunal what it calls its “starting point.” Why was it only a starting point and not the final answer? Because we recognized that viewing *per se* did not necessarily correspond to marketplace value. Even in the broadcast industry which relies heavily on viewing data, ratings do not precisely predict value, because of the viewers’ age, income level and other demographics.

However, in the cable industry, viewing is even a lesser predictor of value. As discussed earlier, cable’s goal is to attract and retain subscribers, and will offer “niche” services, often unrelated to the volume of viewing, to induce segments of the population to subscribe.”

See 57 Fed.Reg. at 15301.

B. Validity of “Sweeps” Periods.

“The [1983] Tribunal had criticized [MPAA] in past proceedings for using only four-cycle data. We were concerned that those were national “sweep” periods that, because of the special programming that aired during that time, might distort the results. This was only a concern. It was not proved, and we looked to additional data to confirm or dispel the concern. Yet, the two additional “partial sweep” periods – January and October – lacked validity.”

See 57 Fed.Reg. at 15299.

C. Validity of Mixing Methodologies.

As to the mixing of meter and diary data, the mixing thereof was deemed statistically problematic. Such issue again appeared in the 1993-1997 proceedings, and continues to appear in these proceedings. See discussion at Section IV. above.

D. The MPAA's selection of Sampled Stations.

As to the MPAA's selection of sampled stations, the MPAA's failure to explain the inclusion and exclusion of certain broadcast stations in its study was deemed problematic. Such issue again appeared in the 1993-1997 proceedings, and continues to appear in these proceedings. See discussion at Section VII. above.

E. Significance of the MPAA's Chronic Methodological Issues.

In the 1989 CRT proceedings, the CRT rejected the wholesale acceptance of the MPAA viewer study, and gave significant weight to the maiden appearance of the Bortz survey. The significance of the aforementioned chronic issues is that, irrespective of the methodological issues of which the MPAA was expressly informed by the CRT and the CARP two decades ago, for *two decades* the MPAA has steadfastly ignored the calls for it to clean up its methodology, the identical methodology presented in these proceedings. Certain errors that first appeared to possibly have been the result of benign oversight -- such as the MPAA's failure proceeding-after-proceeding to comply with its self-identified criteria for selecting sample stations, or the mixing of meter and diary viewing results -- begin to take on the appearance of purposeful design.

The question, of course, is how many times must the MPAA be instructed about its methodological infirmities before it either remedies them or stops presenting methodologies

plagued by them? The question, of course, is why the MPAA insists on adhering to a methodology that is tied to the use of viewer ratings data for which there is an evident lack of sufficient data? The answer, IPG believes, lies in the MPAA's analysis of how its data will error – will it error to the benefit of independent producers, or will it error to the benefit of the largest producers and distributors of programming, i.e., the seven actual members of the MPAA.

X. IPG'S RECALCULATED RESULTS REFLECT THAT IPG IS ENTITLED A REVISED PERCENTAGE OF THE PROGRAM SUPPLIERS CATEGORY ROYALTIES.

A. IPG has recalculated its results depending on which of the IPG arguments set forth above are adopted by the Judges.

Pursuant to the distribution methodology set forth in IPG's Written Direct Statement, as amended, IPG has constructed two alternative sets of results based on the arguments set forth above.

Initially, IPG adjusted its database to remove IPG-represented claims dismissed by the Judges' March 21, 2013 order.⁴⁰ The results of this analysis appear as IPG Exh. R-19.

Next, IPG removed from its database any MPAA-claimed broadcasts derived from the 615 instances in which the MPAA made claim for programming vis-à-vis an agent, and for which the MPAA provided no evidence of either the MPAA's or the agent's authority to represent the underlying owner of copyright. The results of this analysis appear as IPG Exh. R-20.

⁴⁰ Notwithstanding, as of the writing of this rebuttal statement, IPG has a pending motion for reconsideration. At such time as a ruling is forthcoming thereon, IPG will incorporate the determinations and recalculate the presented results pursuant to 37 C.F.R. Section 351.4(b)(3).

Again, with each of the two alternatives, IPG provides three relevant figures for each annual royalty pool; a figure derived, in part, from the number of distant subscribers of a particular station, a figure derived, in part, from the fees generated by the distant transmission of a particular station, and a figure blending those two figures.

B. IPG has additionally calculated the value of claims that are in conflict with the MPAA.

Additionally, and simply to demonstrate the significance of those program broadcasts for which both IPG and the MPAA are making claim, IPG has added a page to both of the foregoing exhibits that reflects which portion of IPG's claimed broadcasts are in conflict with MPAA claimed broadcasts, and what portion is not in conflict with any MPAA claimed broadcasts.

For clarification, IPG's figures err on the side of presuming that *all* MPAA-claimed broadcasts are valid as long as they are not in conflict with IPG-claimed broadcasts. However, in light of the MPAA's rudimentary method for attributing broadcasts with program claims, e.g., without regard to territorial or temporal restrictions, or the possibility of duplicative program titles, this presumption may be very much unwarranted.

C. The MPAA's failure to provide unredacted agreements documenting its authority in these proceedings warrants a significant reduction of its claim.

IPG and the Judges have literally no means by which to determine who the MPAA actually represents, and the extent of such representation. The MPAA's failure to provide its integrated study can appropriately be dealt with by excluding any evidence derived therefrom. The MPAA's failure to substantiate (or even inquire) as to a purported agent's entitlement to represent a claimant can be dealt with by excluding any claims derived therefrom. But how should the Judges deal with the MPAA's refusal to produce anything more than heavily redacted

copies of its agreements for *any* of the claimants it purports to represent, even when a Protective Order is in place that protects the dissemination thereof to parties outside of these proceedings?

Strict application of the rulings of the Judges would require, quite simply, dismissal of all MPAA claims. IPG does not advocate such a draconian ruling, as IPG believes that the harm would only befall claimants that are appropriately entitled to receive their fair share of the cable royalties. Nonetheless, IPG believes that a significant percentage of the MPAA's claim must be assessed as a penalty in order to discourage such actions in the future, e.g. 35%, and awarded to IPG. The MPAA cannot continue to flout its discovery obligations, and preclude adverse parties from scrutinizing MPAA documentation to the extent the MPAA scrutinizes adverse party documentation. It is a fundamental issue of fairness and due process.

CONCLUSION

In light of what has been revealed in these proceedings, little compliment can be given to the MPAA's analysis for the distribution of 2000-2003 cable royalties. The MPAA's viewer study is based on faulty logic, faulty methodology design, faulty rights confirmation, and faulty application, all of which are demonstrated by "hit you over the head" figures reflecting the biases inherent in the relied upon data. A cable royalties distribution study that relies on household viewing is, from a standpoint of logic, flawed out the gate. Cable system operators seeking to increase subscribers or net revenue are the telltale of "value" in these proceedings, not viewer ratings. As has been demonstrated in numerous Phase I proceedings, viewer ratings do not equate with increased subscribership, yet the MPAA viewer study asks that the Judges renounce those prior findings and take the unsubstantiated leap of faith that its entire methodology relies on.

Presuming for the sake of argument that household viewer ratings were the basis of all value assessments, the MPAA viewer study fails for its dependence on unreliable data. Nielsen viewing data that ascribes no distant viewing whatsoever to 76%-82% of all quarter hours measured, and gives vastly disproportionate credit to some stations over others, is disturbingly unreliable.

Presuming that such Nielsen data was reliable for assessing distant viewing, the MPAA viewer study fails *again* by sampling fewer stations than were sampled in the 1983 Cable Proceedings, arbitrarily excluding *thousands* of entitled programs from royalty distribution, and making no attempt to rectify the problems recognized by the CRT more than twenty years ago.

The MPAA's documented failure to deliver essential, compelled, underlying materials has materially prejudiced both IPG's and the Judges' ability to evaluate the MPAA claims. While IPG can assert valid criticisms as to the MPAA's choice to measure viewer decisions rather than cable system operator decisions, and can critique those partial elements of the MPAA viewer study that were produced, IPG is incapable of assessing the MPAA's application of its data or its final results. The evident reason is that the MPAA's final integrated study *was not produced*, nor were all of the step-by-step electronic files that were applied according to the MPAA's own witnesses.

Moreover, the testimony of the MPAA witnesses fails to reveal that a vast percentage of the MPAA's association is not with the actual owners of copyright, but with their ostensible "agents", parties situated no differently than IPG. Although the MPAA sought to have all IPG represented claims dismissed where IPG did not produce a written contract, IPG at least produced anecdotal evidence that IPG represented the underlying copyright owner. The MPAA

produced nothing between itself and the actual claimants - - no agreements, no correspondence, no claims verifications - - and in 615 instances took the word of “agents” as to *everything*. Not one MPAA-represented agent was required to produce an agreement with an underlying claimant in order to verify their representation, and *all* information regarding the ostensibly represented copyright holder claim was obtained from the unsubstantiated “agent”, *not* the copyright holder claimant. IPG knows firsthand that certain of those agent/owner relationships do not exist, and the MPAA’s reliance on the representations of unsubstantiated buffers illuminates the MPAA exaggerated assertion to “directly and indirectly represent as many as 1,400 claimants per royalty year”. Applying the criteria set forth in the Judges’ March 21, 2013 order, all of the program claims asserted through these 615 instances must be dismissed.

Finally, despite IPG’s control of between **7.6%** and **12.25%** of the broadcasts appearing in IPG’s database,⁴¹ derived from 200 to 231 distantly retransmitted stations, the MPAA asserts that IPG is entitled less than one percent (1.0%) of the royalties to be distributed in the Program Suppliers category. Such conclusion, as is clear in Dr. Gray’s testimony, was due to the summary exclusion of any IPG claim wherein the MPAA was also making claim, without clarification as to the effect of such exclusion.

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⁴¹ See IPG Exhs. R-21 and R-22. Such variation depends on the broadcast year, and whether the MPAA’s “unsubstantiated agent” programs are included.

For so many reasons, the MPAA viewer study cannot be utilized as a means of allocating royalties in these proceedings. It is simply that flawed.

Respectfully submitted,

By _____

Raul Galaz

May __, 2013

DECLARATION OF RAUL GALAZ

I declare under penalty of perjury that the foregoing testimony is true and correct, and of my personal knowledge.

Executed on May __, 2013

Raul C. Galaz

Before the
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LIBRARY OF CONGRESS

In the Matter of)
)
)
Distribution of 2000, 2001, 2002) Docket No. 2008-2 CRB CD 2000-2003
And 2003 Cable Royalty Funds) (Phase II)
)

EXPERT REPORT OF LAURA ROBINSON, PH.D.

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I. INTRODUCTION AND ASSIGNMENT

1. My name is Laura Robinson. I have been retained by Pick and Boydston, LLP, counsel for Worldwide Subsidy Group, LLC dba Independent Producers Group (“IPG”), in the matter of *In Re Distribution of 2000, 2001, 2002 And 2003 Cable Royalty Funds*. This matter involves the distribution of 2000, 2001, 2002 and 2003 cable retransmission royalties (“2000-2003 Cable Royalties”).

2. According to U.S. Copyright Office, cable operators paid almost half a billion dollars in royalties during the period 2000-2003. The Phase I dispute regarding the 2000-2003 Cable Royalties, to the extent that it allocated royalties to the Program Suppliers category, was resolved by confidential settlement.¹

3. The instant matter is a Phase II proceeding wherein IPG and the Motion Picture Association of America (“MPAA”) are in dispute as to the division of the 2000-2003 Cable Royalties allocated to the Program Suppliers category. I understand that a central issue in determining the appropriate division of funds allocated to the Program Suppliers category relates to the relative market value of the retransmitted broadcasts of the compensable copyrighted program titles held by IPG and the MPAA.

4. I have been asked by counsel to review the testimony of the MPAA’s witness, Dr. Jeffrey Gray regarding the MPAA’s proposed methodology for the division of the 2000-2003 Cable Royalties allocated to the Program Suppliers category, including the electronic files and data produced by the MPAA in this proceeding. Dr. Gray opines that the MPAA should receive royalty shares in the Program Suppliers category of 98.4%. 99.6%. 99.6%, and 99.7% in the years 2000, 2001, 2002, and 2003, respectively. Dr. Gray’s stated methodology focuses on a

¹ Written Direct Statement of MPAA-Represented Program Suppliers dated May 30, 2012, p. 1.

statistical analysis of program volume, program viewing, and subscriber growth in order to estimate the relative market value of the MPAA and IPG compensable works.

5. I have reviewed and analyzed voluminous data and information during the preparation of this report including datasets produced by the MPAA from Tribune Media Services, Nielsen Media Research, and Cable Data Corporation. I have also reviewed the testimony of various parties including Dr. Gray, Ms. Marsha Kessler, Ms. Jonda Martin, Mr. Paul Lindstrom, and Mr. Kelvin Patterson. Exhibit 1 contains a complete listing of all materials I have reviewed. Consultants from Navigant, working under my direction, provided assistance in the preparation of this report.

6. I file this report in my individual capacity. I have no financial stake in the outcome of this case. My work in this matter is ongoing. I reserve the right to conduct additional analyses and to adjust my opinions accordingly.

II. SUMMARY OF OPINIONS

7. Dr. Gray's opinion that the MPAA should receive royalty shares in the Program Suppliers category of 98.4%. 99.6%. 99.6%, and 99.7% in the years 2000, 2001, 2002, and 2003, respectively, is not reliable or valid. My conclusion is based on evidence and analysis showing that (1) Dr. Gray has not provided the programs, data, and information underlying and supporting his work that would allow an analyst to replicate and verify his results, (2) Dr. Gray's analysis does not provide statistically valid evidence regarding the relative market value of the compensable works, and (3) Dr. Gray's analysis does not provide reasonable estimates of the MPAA's royalty shares.

8. Dr. Gray has not provided the programs, data, and information underlying and supporting his work that would allow an analyst to replicate and verify his results. It is the basis of any scientific endeavor that analyses be replicable. Without sufficient evidence to replicate Dr. Gray's work it is impossible to know what his exact methodology is, whether such methodology is scientifically valid, and whether such methodology was correctly implemented.

9. Even assuming that it were possible to replicate Dr. Gray's analysis and even if such replication indicated that Dr. Gray had properly implemented the analysis and that his analysis were *prima facie* scientifically valid, Dr. Gray's analysis does not provide statistically valid evidence regarding the relative market value of the compensable works. My conclusion is based on evidence and analysis showing that (1) the data used by Dr. Gray are unreliable, (2) the regression analysis conducted by Dr. Gray does not provide statistically valid estimates, and (3) Dr. Gray's conclusions regarding the division of royalties are based on the aforementioned flawed data and analysis.

10. Even if Dr. Gray's analysis provided statistically valid evidence about the relative market value of the compensable works at issue, Dr. Gray's analysis does not provide reasonable estimates of the MPAA's royalty share. My conclusion is supported by the evidence that (1) the MPAA and IPG both claim many of the same program titles, (2) IPG has provided specific evidence for each of its claimed titles, (3) Dr. Gray assumes that each and every title claimed by both the MPAA and IPG is rightfully claimed by the MPAA, and (4) should it be determined that some or all of the titles claimed by both the MPAA and the IPG are rightfully claimed by IPG, Dr. Gray's analysis provides no information as to the impact of same on his estimates of the MPAA royalty shares.

III. QUALIFICATIONS

11. I am currently a Managing Director at Navigant (NYSE: NCI), an international consulting firm with approximately 40 offices in North America, Asia, Europe, and the Middle East. My prior experience includes my work as Managing Principal of The CapAnalysis Group, LLC and as Vice President/Senior Economist at Analysis Group/Economics, Inc. I have held faculty positions at the State University of New York, Stony Brook, the New York Institute of Finance, and the University of Southern California, teaching classes in corporate finance, investments, portfolio theory, financial markets, and law and economics to undergraduate and graduate students.

12. In my professional life I have provided analyses and testimony for numerous matters related to breach of contract, securities fraud, mergers and acquisitions, intellectual property, product liability, legal fees, and insurance recovery. My work often requires the statistical and econometric analysis of large complex databases.

13. My professional experience includes numerous engagements related to intellectual property including patent, copyright, and trademark infringement. My experience in the entertainment industry includes the analysis of movie libraries, television shows, musical artist contracts, movie theaters and live entertainment venues.

14. I earned Ph.D. and M.Phil. degrees in Business from the Finance and Economics Division of Columbia Business School, an M.A. in Economics from the Columbia University Graduate School of Art and Sciences, and an A.B. *cum laude* in Economics from Harvard University.

15. My further experience is summarized in my curriculum vitae, which is attached to this Report as Exhibit 2.

IV. ANALYSIS

16. I have reviewed and analyzed Dr. Gray's report and the supporting evidence produced by the MPAA to IPG.

A. Dr. Gray's Analysis Can Not be Replicated with the Information and Data Produced

17. Dr. Gray has not provided the programs, data, and information underlying and supporting his work that would allow an analyst to replicate and verify his results. It is the basis of any scientific endeavor that analyses be replicable. Without sufficient evidence to replicate Dr. Gray's work it is impossible to know what his exact methodology is, whether such methodology is scientifically valid, and whether such methodology was correctly implemented.

18. The only computer program code produced by the MPAA is embodied in the file entitled, "log_statistics.log." I have reviewed this file and on this basis of this review conclude, (1) Dr. Gray created a dataset entitled "final_set," (2) all the variables used by Dr. Gray in his analysis were contained within the dataset entitled "final_set," and (3) every chart and table in the Gray Amended Report was based on the dataset "final_set." I understand that the MPAA has not produced the dataset "final_set."

19. Dr. Gray makes various statements concerning the data that he used and the analyses that he conducted. However, these statements and the produced data and documents do not comprise sufficient evidence for an analyst to replicate the creation of "final_set" and the analyses based on same. Specifically, in addition to the fact that the MPAA has not produced "final_set" I have identified four statements made in the Gray Amended Testimony, described below, that are vague or unsupported and that prevent replication of Dr. Gray's analysis.

a. Gray Statement 1

20. On page 4 of the Gray Amended Report Dr. Gray states, "...in each instance where both the MPAA-represented Program Suppliers and IPG claim the same title, I attribute such a title to

the MPAA” (“Gray Statement 1A”).² Further, Dr. Gray also states on page 24 of the Gray Amended Testimony, “In order to determine relative viewing minutes during non-sweeps months, I employed multiple regression analysis techniques, relying upon the lists of MPAA and IPG-claimed compensable programs” (“Gray Statement 1B”). In Gray Statement 1 Dr. Gray highlights his use of an electronic input file identifying the MPAA-claimed titles and his creation of an output database that identifies the overlap between the MPAA-claimed and IPG-claimed titles. Dr. Gray has not provided a computer program showing the steps that he took to implement his analysis to attribute titles between the MPAA and IPG; nor has Dr. Gray provided the input and output databases of his title attribution analysis. Thus, Dr. Gray has not provided sufficient information for an analyst to replicate and verify such work.

b. Gray Statement 2

21. On page 16 of the Gray Amended Report Dr. Gray states, “...for each time slot in the Nielsen diary data I merged program title information for MPAA-represented programs prepared from Tribune Media Services...” (“Gray Statement 2A”). In a footnote, also on page 16, Dr. Gray indicates, “The data was provided to me by the Reznick Group, whose representative, Kelvin Patterson, is testifying on behalf of MPAA in this proceeding” (“Gray Statement 2B”).

22. Mr. Patterson testifies that “Reznick then compared the MPAA Titles with the refined Tribune data to identify every distant retransmission of each MPAA Title (‘MPAA Title Retransmissions’) on the Diary Sample Stations and the Local Ratings Sample Stations. The resulting information was provided to MPAA’s witness, Dr. Jeffrey Gray.”³

² Later in this Report I discuss the substantive flaws related to attributing 100% of the disputed titles to the MPAA.

³ Direct Testimony of Kelvin Patterson dated May 30, 2012 [*hereinafter Patterson Testimony*], p. 3.

23. It is unclear to me what data was merged by Dr. Gray as described in Gray Statement 2. Dr. Gray has not provided a computer program showing the steps that he took to implement the stated data merging. Thus, Dr. Gray has not provided sufficient information for an analyst to replicate and verify such work.

d. Gray Statement 3

24. Also on page 18 of the Gray Amended Report Dr. Gray states, "...I then merged the Local Ratings data with the Tribune data, including programming information, to create a combined dataset containing information on program title, date and time slot aired and the program's local rating for every fifteen minute interval for each of the 120 sampled stations from 2000 to 2003" ("Gray Statement 3"). Dr. Gray has not provided a computer program or any other detailed information showing the steps that he took to implement the stated data merging. Thus, Dr. Gray has not provided sufficient information for an analyst to replicate and verify such work.

e. Gray Statement 4

25. On page 21 of the Gray Amended Report, Dr. Gray states "Thus, for every time slot and every day of the year- including sweep *and* non-sweeps periods – the regression model calculates distant viewing to each program on each of the 120 randomly selected stations retransmitted by CSOs" ("Gray Statement 4A"). On page 25-26 of the Gray Amended Report, Dr. Gray states "Based on the mathematical relationship between distant viewing during sweeps months and local ratings as well as other factors described above, I estimated MPAA's and IPG's relative distant viewing share on the randomly selected stations. The multiple regression approach enables me to estimate distant viewership over the entire calendar year, including both sweeps and non-sweeps months" ("Gray Statement 4B").

26. While Dr. Gray has provided a log file that shows that he ran such a regression against some dataset, Dr. Gray has not provided enough information for me or any analyst to replicate his regression analysis. He has not provided the input dataset used for the regression analysis or the output dataset created by the regression. Notably Dr. Gray highlights that he is using a multiple regression analysis because it allows him to predict viewership which he uses to create Chart 3 on page 26 of the Gray Amended testimony. Yet Dr. Gray has not provided the database created by his analysis which shows his predictions. It is impossible to evaluate Dr. Gray's viewership predictions when neither the viewership predictions nor the means to replicate the viewership predictions are provided. These viewership predictions are directly tied to Dr. Gray's conclusions as to the MPAA's share of the royalties at issue and, as such, his conclusions regarding same cannot be verified and evaluated.

B. Dr. Gray's Analysis Does Not Provide Statistically Meaningful Evidence

Dr. Gray's analysis does not provide statistically valid evidence regarding the relative market value of the compensable works. My conclusion is based on evidence and analysis showing that (1) the data used by Dr. Gray are unreliable, (2) the regression analysis conducted by Dr. Gray does not provide statistically valid estimates, and (3) Dr. Gray's conclusions regarding the division of royalties are based on the aforementioned.

a. The Data used by Dr. Gray are Unreliable

27. Dr. Gray relies on the Nielsen Diary data produced by the MPAA, "I rely on Nielsen viewing data to study the volume and viewing information of compensable programs from 2000 through 2003...I rely on two types of Nielsen data: (1) Nielsen Diary data and (2) Nielsen Local Ratings data."⁴

⁴ Testimony of Jeffrey S. Gray, Ph.D. Amended August 20, 2012 [*hereinafter Gray Amended Testimony*], p. 14-15

28. The Nielsen Diary data were produced as files entitled: Nielsen File Format.txt, niel00.txt, niel01.txt, niel02_reg_sta.txt, niel02_sup_sta.txt, and nielsen.txt. I have reviewed and analyzed these files.

29. The Nielsen Diary data has an observation at the station-day-quarter-hour level. In other words, every observation describes how many viewers were watching a particular station on a particular day in a particular quarter hour (“QH”).⁵ Exhibit 3 summarizes the Nielsen Diary data and shows that during 2000-2003 there were more than seven million observations provided in the database corresponding to more than 1.82 million cumulative viewing hours.

30. The most important feature of the Nielsen Diary data is that 5.8 million or 79% of the observations have a value of “zero.” Thus, of the 7.26 million QHs in the Nielsen Diary data only 1.49 million QHs have any measured viewing at all. As discussed in detail below, this reflects the notion that there are no distant viewers watching the majority of stations in the sample during the majority of QHs, during sweeps months from 2000-2003.

31. Further, Exhibit 3 summarizes the Nielsen Diary data for each of the four years from 2000 through 2003. Exhibit 3 shows that the percentage of “zero” observations in the Nielsen Diary data increased over time from 76% in 2000 to 77% in 2001 to 80% in 2002 to 82% in 2003.

32. Exhibit 4 shows the Nielsen data by station for each year from 2000 through 2003 sorted by the percentage of observations indicating “zero” viewing. In the year 2000, Exhibit 4 shows that: (a) in 2000 there were 18 stations that had 90% or more “zero” observations, (b) in 2001 there were 27 stations that had 90% or more “zero” observations, (c) in 2002 there were 37

⁵ Note that the data do not provide a specific date for the observation but rather indicate week (e.g. “week 4” and a day of the week e.g. “day 5.” On page 15 of the Gray Amended testimony, Dr Gray states, “The Nielsen Diary data is obtained from information collected from households throughout the United States during the four ‘sweeps’ months of February, May, July, and November.”

stations that had 90% or more “zero” observations, and (d) in 2003 there were 41 stations that had 90% or more “zero” observations.

33. Exhibit 5 shows that by 2002 virtually all – 98% – of the stations had zero viewing 50% of the time or more. The percentage of stations with 50% or more zero viewing observations grew from 89% in 2000 to 97% in 2001 to 98% in 2002 and 2003.

34. Large numbers of “zero” viewing instances were not restricted to stations with fewer distant subscribers. Using the Cable Data Corporation (“CDC”) data produced in this matter, I merged distant subscriber and fees information with the Nielsen Diary data. Exhibit 6 shows for each station for each year the number and percentage of “zero” viewing QHs along with the total number of distant subscribers. Within each year, Exhibit 6 has sorted the stations by the number of distant subscribers. Thus, it is easy to see that both large and small stations, measured by the number of distant subscribers, may have a majority of “zero” viewing QHs. For example WGN the largest station with between 30 and 35 million distant subscribers in each of the 2000, 2001, 2002, and 2003 years shows “zero” viewing QHs growing from 61% in 2000 and 2001 to 63% in 2002 and 66% in 2003.

35. Exhibit 6 shows that the second ranked broadcast station according to distant subscribers, WPIX New York, had between 2.0 and 2.5 million distant subscribers in each of the 2000, 2001, 2002, and 2003 years, and it indicates “zero” viewing observations growing from 36% in 2000, to 38% in 2001, to 48% in 2002, and 51% in 2003.

36. I understand that Nielsen has not provided relative error rates with along with the Nielsen Diary data. Without such error rates it is impossible to know the accuracy of the Nielsen Diary projections. I understand that Nielsen has previously testified in other matters that single Diary

entries are subject to “huge relative errors.”⁶ With “huge” relative errors, small value projections may not be statistically significant.⁷

37. Further examination of the Nielsen Diary data reveals that most of the non-zero observations are less than 10,000. Exhibit 3 shows that 18% of all Diary data observations are between 0 and 10,000. Further Exhibit 3 shows for each year from 2000 through 2003, virtually all observations, between 97% and 98%, in the Nielsen Diary data were either “zero” or less than 10,000.

b. The Regression Analysis Conducted by Dr. Gray Does Not Provide Statistically Valid Estimates

38. Dr. Gray’s regression analysis does not provide statistically valid estimates. My conclusion is based on analysis and evidence that the regression analysis relies critically on (1) the flawed Nielsen Diary data, (2) the sampling methodology employed by the MPAA, (3) the sampling methodology employed by Dr. Gray, and (4) the specification of the regression models employed.

39. Dr. Gray’s regression analysis relies critically on the flawed Nielsen Diary data discussed in detail above. As described in Gray Statement 4, the essential purpose of Dr. Gray’s regression is to use the Nielsen Diary Data on distant viewership from the sweeps period to estimate distant viewership during the non-sweeps period. If the sweeps period distant viewership data are unreliable then they cannot be the basis for the estimation of distant viewership during the non-sweeps period.

⁶ See 66 Fed.Reg. 66433, 66448-49 (Dec. 26, 2001), Docket No. 2000-2 CARP CD 93-97.

⁷ For example, if an estimate is 10,000 plus or minus 15,000 (at the 95% confidence level) then the estimate is not statistically significantly different from 0.

40. Dr. Gray's regression analysis relies critically on the sampling methodologies employed by the MPAA. The MPAA provide the testimony of Marsha Kessler regarding her sample selection methodology. I reviewed the Direct Testimony of Marsha Kessler, dated May 29, 2012, and on this basis of this review conclude that there is not sufficient information provided in the testimony for an analyst to evaluate or replicate the sample selection methodology. While Ms. Kessler indicates that she selected the sample stations after "[u]sing the CDC Form 3 SOA data,"⁸ she does not specify what criteria she used for the selection of her sample. Sample selection is critical to regression analyses because an improper sample selection can bias the results of the regression analysis.⁹

41. Dr. Gray's regression analysis relies critically on the specifications of the regression models he employs. In order to evaluate the robustness of Dr. Gray's results and how they are impacted by the specifications chosen it is necessary to have or replicate the dataset that Dr. Gray used to conduct his regression analysis.

42. In addition to the regression analysis focused on estimating distant viewership, Dr. Gray also conducts a regression analysis to examine whether "'niche' programming could be more valuable to CSOs if the same level of viewing was associated with subscriber growth."¹⁰ In Table C-2 of Appendix C of the Gray Amended Testimony, Dr. Gray specifies the related regression model. This model seeks to examine "the relationship between the number cable

⁸ See Direct Testimony of Marsha E. Kessler dated May 30, 2012 pp. 11-12.

⁹ For example, suppose a mail survey is conducted to study the factors determining time spent watching television. One unmeasured factor, laziness, could affect both the amount of television watched by the viewer as well as the likelihood that the viewer returns the survey. Therefore, the sample of viewers who return the survey is not representative of the population of television viewers and an analysis based on such a sample would have biased results. See, e.g., PETER KENNEDY, A GUIDE TO ECONOMETRICS 265-267 (6th ed. 2008).

¹⁰ Gray Amended testimony p. 27

subscribers of distantly retransmitted stations and changes in the programming mix on those stations.” In particular Dr. Gray is analyzing the impact of changes in the relative volume of IPG-claimed programming compared to MPAA programming. This specification may be flawed as Dr. Gray’s assumption that all disputed titles are attributable to the MPAA may be incorrect. In addition, the volume share of IPG-claimed programming as measured by Dr. Gray is so small that variations in same will be even smaller, which may make it difficult to obtain statistically significant results given Dr. Gray’s specification. A more appropriate specification may be to transform the volume share of IPG-claimed programming into a measure that more meaningfully accounts for the variation in the volume share; tests to determine if there are more appropriate specifications would be possible with access to Dr. Gray’s programming and data files.¹¹ Thus, Dr. Gray’s finding that the regression results are not significant may be an artifact of the specification rather than an indication that niche programming is not important for subscriber growth.

C. Dr. Gray’s Analysis Does Not Provide Reasonable Estimates of the MPAA’s Royalty Share

43. Dr. Gray’s analysis does not provide reasonable estimates of the MPAA’s royalty share. My conclusion is supported by the evidence that (1) the MPAA and IPG both claim many of the same program titles, (2) IPG has provided specific evidence for each of its claimed titles, (3) Dr. Gray assumes that each and every title claimed by both the MPAA and IPG is rightfully claimed by the MPAA, and (4) should it be determined that some or all of the titles claimed by both the MPAA and the IPG are rightfully claimed by IPG, Dr. Gray’s analysis provides no information as to the impact of same on his estimates of the MPAA royalty shares.

¹¹ PETER KENNEDY, A GUIDE TO ECONOMETRICS 95-96 (6th ed. 2008).

V. CONCLUSIONS

44. I have reviewed and analyzed Dr. Gray's report and the supporting evidence he provided. Based on my review and analysis I conclude that Dr. Gray's opinion that the MPAA should receive royalty shares in the Program Suppliers category of 98.4%, 99.6%, 99.6%, and 99.7% in the years 2000, 2001, 2002, and 2003, respectively, is not reliable or valid. My conclusion is based on evidence and analysis showing that (1) Dr. Gray has not provided the programs, data, and information underlying and supporting his work that would allow an analyst to replicate and verify his results, (2) Dr. Gray's analysis does not rely on or provide statistically valid evidence regarding the relative market value of the compensable works, and (3) Dr. Gray's analysis does not provide reasonable estimates of the MPAA's royalty shares.

Executed on May 15, 2013



Laura O. Robinson, Ph.D.

DECLARATION OF LAURA O. ROBINSON

I declare under penalty of perjury that the foregoing testimony is true and correct, and of my personal knowledge.

Executed on May 15, 2013


Laura O. Robinson

MATERIALS REVIEWED BY NAVIGANT ECONOMICS

Electronic Files

MPAA-PRODUCED:

June 18, 2012:

KESSLER, MARTIN, GRAY

2000

Copy of distant stations - working copy.xls

2001

Copy of DIARY SAMPLE - 2001 CABLE.xls

Copy of MKFXSM01_DISTANTSTATIONS_2001 - working copy.xls

2002

Copy of Diary Sample – 2002.xls

Copy of 2002_DistantStations_ALL FORMS_040322 from CDC – working.xls

2003

Copy of 2003 Diary Sample.xls

Copy of 2003 distant comm'l stations for diary study.xls

LINDSTROM, GRAY

NIELSEN DIARY DATA

Nielsen File Format.txt

niel00.txt

niel01.txt

niel02_reg_sta.txt

niel02_sup_sta.txt

niel03.txt

NIELSEN LOCAL RATINGS DATA

Local Ratings 2000.zip

Local Ratings 2001.zip

Local Ratings 2002.zip

Local Ratings 2003.zip

[each zip file contains multiple .txt files with local ratings data, on market-by-market basis, e.g., “Dallas 2000.txt”]

PATTERSON, GRAY

DIARY STATIONS

Tribune_Masha.txt

2000 Detail of Diary Matches.xlsx

2001 Detail of Diary Matches.xlsx

2002 Detail of Diary Matches.xlsx

2003 Detail of Diary Matches.xlsx

LOCAL RATINGS STATIONS

2000 Detail of Local Matches.txt

2001 Detail of Local Matches.txt

2002 Detail of Local Matches.txt

2003 Detail of Local Matches.txt
Tribune_Gray.txt

July 10, 2012:

Detail_of_Local_Matches_Field_Definitions.xlsx
Tribune_Field_Definitions.xlsx
Tribune_Marsha v2.txt
Tribune_Gray v2.txt

August 21, 2012:

00-03 Detail of IPG Matches.xlsx
log_statistics.log
MPAA-RP-05868 - MPAA-RP-05869.pdf
MPAA-RP-05837 - MPAA-RP-05867.pdf

IPG-PRODUCED:

An IPG-prepared electronic file entitled “Zero Viewing analysis.accdb” (Microsoft Access format)

Hard-copy files:

- 1) MPAA Written Direct Statement;
- 2) MPAA Amended Written Direct Statement;
- 3) MPAA response to IPG document requests;
- 4) MPAA response to IPG follow-up document requests;
- 5) MPAA response to IPG document requests on Amended Written Direct Statement;
- 6) MPAA identification of files produced in discovery;
- 7) a listing of all the Electronic Folders and Files Produced by MPAA;
- 8) An IPG-prepared flowchart of the MPAA-produced electronic files;
- 9) Printouts of IPG’s “Zero Viewing analysis.accdb”, referenced above;
- 10) An Order issued by the Librarian of Congress, 66 Fed.Reg. 66433, Docket No. 2000-2 CARP CD 93-97.
- 11) Documents produced by the MPAA, bate-stamped MPAA-RP-004556-4606.

Laura O. Robinson, Ph.D.
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EDUCATION

Ph.D., Columbia Business School, Finance and Economics Division, Thesis: *Information Acquisition in Financial Markets*, 1994

M.Phil, Columbia Business School, Finance and Economics Division, 1994

M.A., Economics, Columbia University, Graduate School of Arts and Sciences, 1990

A.B., Economics, *cum laude*, Harvard University, Cambridge, MA, 1986

MCLE Credit Program (42 Hours), Pepperdine University, School of Law, Straus Institute for Dispute Resolution, "Mediating the Litigated Case," 2009

PRESENT POSITIONS

Navigant Consulting, Inc., *Managing Director & Principal*, 2011 to present

Damages Subcommittee, Criminal Litigation Committee, American Bar Association's Section of Litigation, *Chair*, 2013 to present

The Greatest Gift Corporation: focuses on the development of various intellectual property rights. *Director and Treasurer*, 1996 to present

Great Kids, Inc. (non-profit): Promoting the best possible outcomes for children and families by developing exceptional home-based, early childhood programs. *Director*, 2008 to present

PROFESSIONAL EXPERIENCE

Financial Analytics Consulting Team, Inc., Los Angeles, CA, *Founder*, 2006 – 2010

University of Southern California, Economics Department, *Adjunct Assistant Professor*, 2010

Howrey LLP, Los Angeles, CA, *Managing Principal, CapAnalysis Division*, 2003-2006

Analysis Group/Economics, Los Angeles, CA, *Vice President/Senior Economist*, 1998-2003

Milken Institute, Santa Monica, CA, *Research Associate*, 1994-1998

University of Southern California, Marshall School of Business, *Part-Time Faculty*, 1995-1996

State University of New York At Stony Brook, Harriman School of Management and Policy and, by courtesy, Department of Economics, *Assistant Professor*, 1993-1995

New York Institute of Finance, *Instructor*, 1991-1992

Columbia Business School, *Teaching Assistant and Research Assistant*, 1989-1993

ICF Inc., Washington, DC, *Research Assistant*, 1986-1987

Harvard University, Computer Science (QRR) *Teaching Fellow*, 1983-1984

Applitech Software, *Programmer*, Summer 1984

HONORS AND AWARDS

Research Grant, Research Foundation of the State University of New York. 1993-1994
Fellow, Graduate School of Business, Columbia University, New York, NY. 1990-1993
Fellow, Earhart Foundation, Ann Arbor, MI. 1989-1990
Fellow, Bradley Foundation, New York, NY. 1988-1989
Harvard College Scholarship, Harvard University, Cambridge, MA. 1984-1985
Elizabeth Cary Agassiz Merit Award, Radcliffe College, Cambridge, MA. 1984-1985

EXPERT WITNESS DESIGNATIONS AND TESTIMONY

- 2013 Submitted expert report in the matters of *Vector Calculus Fund, LLC, Velocity Partners Fund, LLC, A Partner Other Than The Tax Matters Partners v. Commissioner of Internal Revenue; and Veritas Cambridge Fund, LLC, Velocity Partners Fund, LLC, A Partner Other Than The Tax Matters Partners v. Commissioner of Internal Revenue* (United States Tax Court, Docket Nos. 11481-12 and 11692-12).
- 2013 Submitted expert report in the matter of *Milo H. Segner, Jr. as Trustee of the PR Liquidating Trust v. Sinclair Oil & Gas Company, The Sinclair Companies, Sinclair Finance Company, and Sinclair Oil Corporation* (United States District Court, Northern District of Texas, Dallas Division, Case No. 3:11-cv-03606-F).
- 2013 Submitted expert report and rebuttal report and provided deposition and trial testimony in the matter of *Huff Fund Investment Partnership d/b/a Musashi II LTD. and Bryan E. Bloom v. CKX, Inc.* (In the Court of Chancery, State of Delaware, C.A. No. 6844-VCG).
- 2012 Submitted expert report re economic value of litigation claims in the matter of *In Re: M Waikiki LLC, Debtor* (United States Bankruptcy Court, District of Hawaii, Chapter 11 Case No. 11-02371).
- 2011 Retained and submitted expert report re economic value of injunctive relief in the matter of *Fiori, et al. v. Dell, et al.* (USDC Case No. 09 CV 01518 JW).
- 2010 Retained as economic damages expert in the matter of *Grover Landscape Services v. Foster Poultry Farms* (Placer County Superior Court No. SCV 24955).
- 2010 Testified in trial in the matter of *Compulink v. St. Paul Fire and Marine* as an expert witness for plaintiff regarding legal fees dispute in insurance coverage matter (JAMS Case No. 1200042429).
- 2009 Provided expert report re economic damages and reasonable royalties in patent infringement dispute in the matter of *MAG Instrument, Inc. v. The Coleman Company, Inc. et al.* (United States District Court, Central District of California, Case No. CV 09-01842-R (OPx)).

- 2009 Designated as expert witness for defendants regarding remediation costs in *Orange County Water District v. Northrop et al.* (Orange County Superior Court, Case No. 04CC00715).
- 2009 Provided trial and deposition testimony on behalf of plaintiff in the matter of *Signature Networks, Inc. v. Major League Baseball Advanced Media, Inc.* (American Arbitration Association, Case No. 13 117 Y 00659 07)
- 2008 Designated as expert witness regarding economic damages in the matter of *Steven Fields v. Moxie Enterprises, Inc.* matter. Retained on behalf of defendant to estimate value partnership and related dissolution issues.
- 2008 Provided confidential expert consulting services to major shareholder of a comScore Media Metrix top ten Internet company; valuation of equity shares pre and post dilution; provided financial and economic analyses for successful settlement.
- 2008 Provided deposition testimony re economic damages in real estate foreclosure matter on behalf of the plaintiff in the matter of *Desiree and Patrick Cabana v. Rodriguez et al.* (Superior Court of the State of California County of Los Angeles, Case BC351551).
- 2008 Submitted expert report re economic damages from breach of contract claim in pharmaceutical industry. Retained on behalf of defendant in the matter of *SinoMab Bioscience Ltd., Skytech Technology Ltd., and Shui-on Leung v. Immunomedics, Inc.* (In the Court of the Chancery of the State of Delaware in and for New Castle County, Case No. 2471-N).
- 2007 Provided expert consulting and analysis re economic damages and financial health of hedge fund in contract dispute. Participated in successful mediation on behalf of plaintiff in the matter of *Andrew C. Sankin v. Perceptive Advisors, LLC* (JAMS/Endispute New York City, Ref. No. 1420017681).
- 2007 Designated as expert witness and provided analysis of economic damages in theft of trade secrets matter; retained by defendants in the matter of *Robert Half International, Inc. v. Denise M. Bennet Walls et al.* (American Arbitration Association, Case No. 33 181 00121 06).
- 2006 Submitted expert report and provided deposition testimony re economic damages in theft of trade secrets matter. Retained by defendants in the matter of *Robert Half International, Inc. v. Vaco, LLC et al.* (Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida, Case 48-2005-CA-005454-O).
- 2006 Submitted expert report on behalf of plaintiff re economic damages in patent infringement and unfair business practices matter, *American Tru-Spinners, Inc. et al. v. Super Buy Tires, Inc. et al.* (United States District Court, Southern District of California, Case No. 05 CV).

2005 Retained as a testifying expert re economic damages by plaintiff in antitrust matter *The Epoch Group, Inc. et al. v. Finisar et al.* (United States District Court, Central District of California, Case No. CV05 7262 SVW CTX).

2005 Designated as a testifying expert re economic damages by plaintiff in a contract dispute with unfair practices claims in the matter of *The Epoch Group, Inc. et al. v. EMC Corp., et al.* (Ventura County Superior Court, Case No. SC039439).

2005 Retained as a financial testifying expert by plaintiff in a dispute regarding a life insurance claim in the matter of *Stevenson et al. vs. The Prudential Insurance Company of America et al.* (Los Angeles County Superior Court, Central District, Case No. BC296439). Prepared an analysis of the financial health of Prudential Insurance Company of America.

2004-2005 Retained as a financial and economic testifying expert by defendant Lycos, Inc. in a dispute regarding an earn out clause pursuant to a merger in the matter of *Valani et al vs. Lycos et al.* (United States District Court, Northern District of California, Case No. C 03 463 JSW ARB). Prepared an analysis of damages.

July 2004 Designated as a financial and economic testifying expert to provide an analysis of damages by defendants First National Bank of Central Texas and Electronic Financial Group, Inc. in a breach of contract dispute regarding debit card fees and commissions in the matter of *Mazumah, Inc. v. 4Electronic Funds Transfer, Inc. et al.* (San Diego County Superior Court, Central Division, Case No. GIC819657).

June 2004 Provided trial and deposition testimony regarding lost profits and reasonable royalties on behalf of PLH Products, Inc. in a theft of trade secrets dispute between *PLH Products, Inc. v. Saunas R Us et al.* (Los Angeles County Superior Court, East District, No. KC 041545L)

May 2003 Provided trial and deposition testimony regarding economic damages from contract dispute on behalf of Pacific Bell for *Tel-Rom v Pacific Bell Telephone Company and Pacific Bell Public Communications* (Los Angeles County Superior Court No. BC 252881)

January 2003 Designated as an expert re economic damages on behalf of Zoasis Corporation for *Acree and Hiestand v VCA Antech, Inc., Zoasis Corporation, and Robert Antin* (Los Angeles County Superior Court No. BC 262736)

December 2002 Designated as an expert re economic damages from employment contract dispute on behalf of Avjet Corporation for *Avjet Corporation v Dominguez.* (Los Angeles County Superior Court (Van Nuys) No. LC 060723)

November 2002	Submitted Declaration re damages from improper credit card late fees and finance charges on behalf of the Class for <i>Priore et al. v World Financial Network Bank, et al.</i> (United States District Court for the Southern District of Florida, Miami Division, Case No. 00-4373-CIV-HUCK)
September 2002	Submitted Declaration re damages from improper credit card late fees and finance charges on behalf of the Class for <i>Lillian Lopez et al. v GE Capital Consumer Card Co.</i> (United States District Court for the Southern District of Florida, Miami Division, Case No. 01-4828-CIV-SEITZ/GARBER)
September 2002	Submitted Declaration re damages from improper credit card late fees and finance charges on behalf of the Class for <i>Hernandez et al. v Monogram Credit card Bank of Georgia, et al.</i> (In the Circuit Court of the 11 th Judicial Circuit in and for Miami-Dade County, Florida, Case No. 01-23566 CA 06)
May 2002	Provided deposition testimony re stock option valuation and economic damages on behalf of Daniel DiPaola in <i>Daniel DiPaola v. California Tickets.com Inc., Idealab! Holdings, Inc., et al.</i> (Los Angeles County Superior Court No. BC 2234973)
May 2002	Provided deposition testimony on reasonable royalties and economic damages in software-related patent infringement matter on behalf of Sentius Corporation in <i>Sentius Corp. v. Flyswat, Inc.</i> (United States District Court, Northern District of California, Case No. C 00 2233 SBA)
March 2002	Provided trial and deposition testimony re economic damages from contract dispute on behalf of Cambridge Information Systems in <i>MOCA, Inc., Merisel Inc. v. Cambridge Information Systems, Inc. et al.</i> (Los Angeles County Superior Court No. YC040542)
February 2002	Provided trial and deposition testimony re economic damages and statistical analysis of discrimination on behalf of defendants in <i>Apple One v. Olsten Staffing Services, Inc., Smith, Reichers, et al.</i> (Los Angeles County Superior Court No. BC 200657)
October 2001	Provided trial and deposition testimony on economic damages from theft of trade secrets on behalf of El St. John in <i>Golden Road Presents, Inc., Silver Cybertech Inc., and El St. John v. Harvey J. Anderson, Flywheel, Inc. et al.</i> (San Francisco Superior Court No. 313897)
August 2001	Submitted Declaration re damages from improper credit card late fees and finance charges on behalf of the Class for <i>Boehr et al. v. Bank of America, et al.</i> (United States District Court, District of Arizona, Case No. CIV'99 22 65 PHX PGR)

August 2001 Designated as an economic expert re lost earnings on behalf of California State University in *Bell v. California State University, San Marcos et al.* (San Diego County Superior Court No. GIN 008719)

June 2001 Designated as economic expert re lost earnings on behalf of Minnesota Mining and Manufacturing Company in the matter of *Colon v. Minnesota Mining and Manufacturing Company, Imation Corp., et al.* (Los Angeles County Superior Court No. BC 240741)

January 2001 Submitted Declaration re damages from improper credit card late fees and finance charges on behalf of the Class for *Martin Klausner vs. First Union Direct Bank, N.A.* (United States District Court, Central District of California, Case No. 00-04267 LGB (AJWx))

December 2000 Designated as an economic expert re lost earnings on behalf of APCOA/Standard Parking, Inc. in *John Becka v. APCOA/Standard Parking, Inc.* (United States District Court, Central District of California - Southern, Case No. SA CV 00-190)

October 2000 Submitted expert report and declaration re statistical analysis of housing discrimination on behalf of Coachella Valley Housing Coalition for *City of Moreno Valley Coachella Valley Housing Coalition v. City of Moreno Valley* (U.S.D.C. Case No. EDV 96-430 RT (VAPx))

September 2000 Submitted Declaration re damages from improper credit card late fees and finance charges on behalf of the Class for *Elliot Schwartz et al. v. Citibank (South Dakota) N.A., Universal Bank, N.A., Universal Financial Corp., et al.* (United States District Court, Central District of California, Case No. 00-00075 LGB (JWJX))

August 2000 Designated as an economic expert re lost earnings on behalf of California State University in *Lillian Colores v. California State University, Los Angeles et al.*

May 2000 Designated as a business expert re start-up valuation for *Richard McPherson v. Catherine Chien, Jeff Chien, et al.* litigation (Orange County Superior Court No. 808613)

June 1999 Submitted expert report re lost earnings on behalf of Seminis Vegetable Seeds in *Herrejon v. Seminis Vegetable Seeds, Inc.* (Ventura County Superior Court No. CIV 181907)

October 1998 Designated as a financial expert re customer fees in *State of California ex rel. Stull v. Bank of America, et al.* litigation (San Francisco Superior Court No. 968484)

IN THE NEWS

Heather Smith, "The Fix Is In," *Corporate Counsel*, "Howrey Litigators Elizabeth Weaver and Joanne Lichtman and Economist Laura Robinson: Taking a Calculated Risk on Unocal's Environmental Docket". (November, 2005)

ARTICLES AND PRESENTATIONS

"Financial-Fraud Enforcement on the Rise," Winter 2013, Vol. 13 No. 2, *Criminal Litigation*, American Bar Association Section of Litigation.

"Establishing Organizational Standing and Damages," Presentation with Liam Garland, F. Willis Caruso, and Sharon Kinlaw, February 2009, *16th Annual Fair Housing Laws and Litigation Conference*, San Diego, CA.

"Controlling Costs, Managing Risk: A Guide to Early Case Assessment and Litigation Budgeting," with Elizabeth Weaver, Joanne Lichtman, and Gil Keteltas, October 2006, MCLE Course for Howrey LLP attorneys and clients.

"Decision Tree Analysis: An effective tool for predicting and optimizing litigation outcomes," 2004, MCLE course for Howrey Simon Arnold & White, LLP attorneys.

"Economics of the Rapidly Changing Music Industry," 2001, *Analysis Group Newsletter*.

"Turning Internet Traffic into Dollars: Using Data to Create Value," 1999, in *Advising the Cyber Start-Up*, Center for Continuing Education, Monterey, CA, CD-ROM, MCLE Course.

"Organizational Decision Making with Similar Alternatives," (with Amy E. Hurley), 1999, *The Journal of Psychology*, 133(1), 73-84.

"ESOPs, Managerial Entrenchment, and Firm Performance," 1997, *French Finance Association 14th International Conference Proceedings*, Grenoble, France.

"ESOPs: For Whose Benefit?" 1996, *Jobs and Capital*, Milken Institute.

"Small Businesses Deserve More," *Los Angeles Business Journal*, August 26, 1996.

"Venture Capitalists in an Information Equilibrium," 1994, *Decision Sciences Institute 1994 Annual Conference Proceeding*.

PROFESSIONAL ORGANIZATIONS

American Bar Association (Associate)
American Finance Association
Financial Management Association
American Economic Association

Exhibit 3: Quarter-Hours by Number of Viewers**Quarter Hours**

Year	No Viewers	Between 0 and 10,000 Projected Viewers	Greater than 10,000 Projected Viewers	of Quarter- Hours
2000	1,157,309	310,984	45,051	1,513,344
2001	1,038,204	277,094	28,702	1,344,000
2002	1,725,205	369,443	58,440	2,153,088
2003	1,847,544	362,624	42,376	2,252,544
Total	5,768,262	1,320,145	174,569	7,262,976

Percentages

Year	Observations with No Viewers	Observations with between 0 and 10,000 Projected Viewers	Observations with Greater than 10,000 Projected Viewers	Total
2000	76%	21%	3%	100%
2001	77%	21%	2%	100%
2002	80%	17%	3%	100%
2003	82%	16%	2%	100%
Total	79%	18%	2%	100%

Source: niel00.txt; niel01.txt; niel02_reg_sta.txt; niel02_sup_sta.txt; nielsen.txt

Year 2000 Viewing Statistics

Source: *niel00.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WHUB	5,349	5,376	99%
KTXL	13,157	13,440	98%
KBWB	20,897	21,504	97%
KTNC	18,265	18,816	97%
WBPX	20,711	21,504	96%
WIAT	12,747	13,440	95%
KYW	20,365	21,504	95%
WGCL	12,685	13,440	94%
WTMJ	20,245	21,504	94%
WISN	17,711	18,816	94%
WGNX	7,588	8,064	94%
WITN	12,439	13,440	93%
WCFT	12,396	13,440	92%
WTVD	12,351	13,440	92%
WLVI	19,733	21,504	92%
WPVI	19,405	21,504	90%
KRON	19,387	21,504	90%
WTRF	12,050	13,440	90%
KICU	18,983	21,504	88%
WVTV	18,871	21,504	88%
WPSG	18,771	21,504	87%
KPIX	18,636	21,504	87%
WBZL	18,545	21,504	86%
WRIC	11,507	13,440	86%
WBRE	11,455	13,440	85%
KDKA	18,260	21,504	85%
WBRC	11,394	13,440	85%
WXIX	18,204	21,504	85%
KCOP	17,969	21,504	84%

Year 2000 Viewing Statistics

Source: *niel00.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WDIV	17,952	21,504	83%
KTVU	17,831	21,504	83%
KPLR	17,763	21,504	83%
WBZ	17,726	21,504	82%
KSHB	17,596	21,504	82%
KCRA	10,883	13,440	81%
WFLD	17,211	21,504	80%
WPXI	17,039	21,504	79%
WUNI	17,032	21,504	79%
WKRN	10,635	13,440	79%
WTXF	17,004	21,504	79%
WDCA	16,889	21,504	79%
KMBC	16,805	21,504	78%
KXTX	12,602	16,128	78%
KSDK	16,787	21,504	78%
WAGA	16,653	21,504	77%
KNBC	16,357	21,504	76%
WJZ	16,166	21,504	75%
KGO	16,122	21,504	75%
WPHL	16,010	21,504	74%
KCAL	15,682	21,504	73%
WTAE	15,674	21,504	73%
WNYW	15,545	21,504	72%
WCAU	15,458	21,504	72%
KMSP	15,345	21,504	71%
WXIA	15,319	21,504	71%
WWOR	15,311	21,504	71%
WBAL	15,299	21,504	71%
WKYT	9,515	13,440	71%

Year 2000 Viewing Statistics

Source: *niel00.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WKBD	15,202	21,504	71%
WIS	9,447	13,440	70%
WFQX	7,515	10,752	70%
KTHV	9,053	13,440	67%
WUSA	13,985	21,504	65%
WNBC	13,862	21,504	64%
KARK	8,659	13,440	64%
WSBK	13,800	21,504	64%
KPTV	8,624	13,440	64%
WSEE	8,581	13,440	64%
KABC	13,451	21,504	63%
WGN	13,168	21,504	61%
WSB	12,736	21,504	59%
KTLA	12,540	21,504	58%
WSYX	7,832	13,440	58%
WUAB	9,319	16,128	58%
KUSA	9,121	16,128	57%
WGKI	1,520	2,688	57%
KCNC	9,070	16,128	56%
KMGH	8,496	16,128	53%
KWGN	8,141	16,128	50%
KATV	6,681	13,440	50%
WFAA	7,682	16,128	48%
WPIX	7,807	21,504	36%
WBNS	4,730	13,440	35%

Year 2001 Viewing Statistics

Source: *niel01.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
KPIX	5,376	5,376	100%
WBPX	5,376	5,376	100%
WHUB	2,688	2,688	100%
WLVI	5,376	5,376	100%
WKPT	10,610	10,752	99%
KTNC	15,839	16,128	98%
KTXL	10,552	10,752	98%
WPCB	10,517	10,752	98%
KBWB	15,602	16,128	97%
WITN	10,358	10,752	96%
KYW	15,442	16,128	96%
WMAR	10,248	10,752	95%
WISN	15,339	16,128	95%
WGCL	15,301	16,128	95%
WIAT	10,192	10,752	95%
WTMJ	14,984	16,128	93%
WVTV	14,956	16,128	93%
WTVD	9,949	10,752	93%
WNWO	9,932	10,752	92%
WPMT	9,855	10,752	92%
WLYH	9,753	10,752	91%
WALA	9,748	10,752	91%
WWBT	9,717	10,752	90%
WPVI	14,571	16,128	90%
KRON	14,479	16,128	90%
KICU	14,469	16,128	90%
WTAJ	9,638	10,752	90%
WDRB	9,501	10,752	88%
WRIC	9,428	10,752	88%

Year 2001 Viewing Statistics

Source: *niel01.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
KDKA	13,998	16,128	87%
WPSG	13,967	16,128	87%
KSTW	9,278	10,752	86%
WPGH	9,251	10,752	86%
WXIX	13,874	16,128	86%
WGAL	9,126	10,752	85%
WBZL	13,549	16,128	84%
KCOP	13,529	16,128	84%
WDIV	13,516	16,128	84%
KXTX	11,222	13,440	83%
KTVU	13,367	16,128	83%
KPLR	13,292	16,128	82%
WBZ	13,265	16,128	82%
WBRE	8,805	10,752	82%
WPTY	8,796	10,752	82%
WFLD	13,137	16,128	81%
KCRA	8,728	10,752	81%
WCMH	8,655	10,752	80%
KSHB	12,944	16,128	80%
WBRZ	8,625	10,752	80%
WKRN	8,573	10,752	80%
WDCA	12,822	16,128	80%
KGO	12,772	16,128	79%
KMBC	12,748	16,128	79%
WPXI	12,635	16,128	78%
WCVB	8,291	10,752	77%
KSDK	12,385	16,128	77%
WUNI	12,233	16,128	76%
WTFX	12,228	16,128	76%

Year 2001 Viewing Statistics

Source: *niel01.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WAGA	12,156	16,128	75%
WTAE	12,022	16,128	75%
KCAL	11,938	16,128	74%
WJZ	11,913	16,128	74%
WWOR	11,896	16,128	74%
WPHL	11,890	16,128	74%
KNBC	11,875	16,128	74%
WKYT	7,870	10,752	73%
WRC	7,832	10,752	73%
WNYW	11,503	16,128	71%
WKBD	11,499	16,128	71%
KMSP	11,313	16,128	70%
WCAU	11,277	16,128	70%
WCCO	7,481	10,752	70%
WXIA	11,161	16,128	69%
WFQX	7,425	10,752	69%
WTTG	7,250	10,752	67%
KARK	7,176	10,752	67%
WBAL	10,749	16,128	67%
WLTV	7,116	10,752	66%
WIS	7,113	10,752	66%
WSYX	7,055	10,752	66%
WUSA	10,516	16,128	65%
WSEE	6,980	10,752	65%
KPTV	6,979	10,752	65%
WUAB	8,700	13,440	65%
KTHV	6,845	10,752	64%
KABC	10,089	16,128	63%
WSBK	9,996	16,128	62%

Year 2001 Viewing Statistics

Source: *niel01.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
KTLA	9,976	16,128	62%
KUSA	8,199	13,440	61%
KCNC	8,158	13,440	61%
WGN	9,770	16,128	61%
WSB	9,663	16,128	60%
WNBC	9,649	16,128	60%
KMGH	7,972	13,440	59%
KWGN	7,479	13,440	56%
KATV	5,969	10,752	56%
KWTV	5,962	10,752	55%
KFOR	5,400	10,752	50%
WFAA	6,648	13,440	49%
WBNS	4,218	10,752	39%
WPIX	6,119	16,128	38%

Year 2002 Viewing Statistics

Source: *niel02_reg_sta.txt* and *niel02_sup_sta.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WGTW	21,484	21,504	100%
WTLW	13,420	13,440	100%
WGME	13,307	13,440	99%
KTXL	13,288	13,440	99%
WSFJ	13,176	13,440	98%
WGGB	13,163	13,440	98%
KXTX	15,780	16,128	98%
WWHO	13,148	13,440	98%
KBHK	20,999	21,504	98%
WPXS	20,937	21,504	97%
KYW	20,723	21,504	96%
WNWO	12,939	13,440	96%
KRON	20,657	21,504	96%
WISN	20,536	21,504	95%
WTRF	12,797	13,440	95%
WIAT	12,768	13,440	95%
WTGS	12,754	13,440	95%
KTNC	20,395	21,504	95%
WITN	12,718	13,440	95%
WVTV	20,326	21,504	95%
WTOV	12,637	13,440	94%
WGCL	20,119	21,504	94%
KMTV	12,571	13,440	94%
WPVI	20,110	21,504	94%
WLYH	12,563	13,440	93%
WFTC	20,094	21,504	93%
WEWS	14,991	16,128	93%
WLVI	19,894	21,504	93%
KUVS	12,428	13,440	92%

Year 2002 Viewing Statistics

Source: *niel02_reg_sta.txt* and *niel02_sup_sta.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WPMT	12,364	13,440	92%
WJW	14,827	16,128	92%
WTVD	12,350	13,440	92%
WALA	12,341	13,440	92%
WTMJ	19,694	21,504	92%
KSTW	14,750	16,128	91%
WCWB	19,660	21,504	91%
WBBM	19,616	21,504	91%
WXIN	14,424	16,128	89%
WWBT	12,008	13,440	89%
KPIX	19,073	21,504	89%
WMAQ	19,023	21,504	88%
WBZL	18,891	21,504	88%
WAFB	11,783	13,440	88%
WWLP	11,749	13,440	87%
WPSG	18,768	21,504	87%
WRIC	11,671	13,440	87%
KDKA	18,565	21,504	86%
KCOP	18,527	21,504	86%
KICU	18,494	21,504	86%
WKRN	11,558	13,440	86%
WBRE	11,477	13,440	85%
WHDH	18,328	21,504	85%
KETV	11,444	13,440	85%
WCHS	11,438	13,440	85%
WDIV	18,296	21,504	85%
WCFT	11,398	13,440	85%
WCVB	18,069	21,504	84%
KPLR	17,904	21,504	83%

Year 2002 Viewing Statistics

Source: *niel02_reg_sta.txt* and *niel02_sup_sta.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WXIX	17,888	21,504	83%
KTVU	17,865	21,504	83%
KCBS	17,816	21,504	83%
KGO	17,730	21,504	82%
WAGA	17,628	21,504	82%
KSHB	17,616	21,504	82%
KMBC	17,552	21,504	82%
WDCA	17,476	21,504	81%
WWOR	17,406	21,504	81%
WBZ	17,405	21,504	81%
KMSP	17,404	21,504	81%
WBRZ	10,811	13,440	80%
KCRA	10,773	13,440	80%
WNCT	10,743	13,440	80%
KSDK	17,184	21,504	80%
WTFX	17,174	21,504	80%
WHBQ	10,701	13,440	80%
KSL	10,669	13,440	79%
WBRC	10,634	13,440	79%
KNBC	16,939	21,504	79%
WLIO	10,546	13,440	78%
WFLD	16,666	21,504	78%
WNYW	16,633	21,504	77%
WJZ	16,548	21,504	77%
WTAE	16,452	21,504	77%
KDFW	12,251	16,128	76%
KCAL	16,276	21,504	76%
WPHL	16,040	21,504	75%
WCAU	15,890	21,504	74%

Year 2002 Viewing Statistics

Source: *niel02_reg_sta.txt* and *niel02_sup_sta.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WIBW	9,917	13,440	74%
KGW	9,885	13,440	74%
WBAL	15,553	21,504	72%
WKBD	15,381	21,504	72%
WFQX	9,499	13,440	71%
WUNI	13,295	18,816	71%
WUSA	15,067	21,504	70%
WXIA	15,026	21,504	70%
KPTV	9,248	13,440	69%
WKYT	9,142	13,440	68%
KARK	9,040	13,440	67%
KABC	14,435	21,504	67%
WSYX	9,020	13,440	67%
KTLA	14,360	21,504	67%
WSEE	8,913	13,440	66%
WIS	8,804	13,440	66%
WLKY	8,774	13,440	65%
WSB	13,727	21,504	64%
WSBK	13,724	21,504	64%
WNBC	13,620	21,504	63%
WGN	13,597	21,504	63%
WUAB	10,148	16,128	63%
KTHV	8,270	13,440	62%
KMGH	9,832	16,128	61%
KCNC	9,802	16,128	61%
KWTV	8,066	13,440	60%
KUSA	9,624	16,128	60%
KATV	7,349	13,440	55%
KWGN	8,384	16,128	52%

Year 2002 Viewing Statistics*Source: niel02_reg_sta.txt and niel02_sup_sta.txt*

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
KATU	6,936	13,440	52%
KFOR	6,869	13,440	51%
WFAA	8,232	16,128	51%
WPIX	10,322	21,504	48%
WBNS	5,217	13,440	39%
WTBS	199	21,504	1%

Year 2003 Viewing Statistics

Source: nielsen.txt

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WTVE	2,668	2,688	99%
WNDS	21,334	21,504	99%
WGME	13,328	13,440	99%
WBQC	21,301	21,504	99%
KUSI	13,275	13,440	99%
KTXL	13,232	13,440	98%
KBHK	21,165	21,504	98%
KTNC	21,082	21,504	98%
WMLW	21,064	21,504	98%
WMAR	21,040	21,504	98%
KBWB	21,029	21,504	98%
KRON	20,860	21,504	97%
KXTX	15,623	16,128	97%
WISN	20,788	21,504	97%
WPTY	12,948	13,440	96%
WAPK	12,927	13,440	96%
WVTV	20,637	21,504	96%
KYW	20,570	21,504	96%
WIAT	12,836	13,440	96%
WITN	12,830	13,440	95%
WBDC	20,461	21,504	95%
KMSP	20,379	21,504	95%
WGCL	20,217	21,504	94%
WBKI	12,634	13,440	94%
WTMJ	19,981	21,504	93%
WPVI	19,883	21,504	92%
WBBM	19,784	21,504	92%
WALA	12,361	13,440	92%
WPMT	12,348	13,440	92%

Year 2003 Viewing Statistics

Source: nielsen.txt

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WLYH	12,331	13,440	92%
KIRO	14,777	16,128	92%
WTVD	12,314	13,440	92%
WVTM	12,295	13,440	91%
KSTW	14,742	16,128	91%
WWBT	12,281	13,440	91%
WFTC	19,606	21,504	91%
KTEL	12,206	13,440	91%
WCWB	19,517	21,504	91%
KDKA	19,495	21,504	91%
KCOP	19,308	21,504	90%
KTRK	14,448	16,128	90%
WYTV	11,993	13,440	89%
WKRN	11,898	13,440	89%
KICU	18,923	21,504	88%
WBZL	18,914	21,504	88%
WRIC	11,812	13,440	88%
WPSG	18,861	21,504	88%
KTVU	18,852	21,504	88%
WDCA	18,800	21,504	87%
WGAL	11,738	13,440	87%
WTVQ	11,652	13,440	87%
WDRB	11,648	13,440	87%
WCMH	11,635	13,440	87%
WHBQ	11,561	13,440	86%
WTAJ	11,553	13,440	86%
WAFB	11,415	13,440	85%
KPLR	18,258	21,504	85%
KCBS	18,246	21,504	85%

Year 2003 Viewing Statistics

Source: nielsen.txt

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WCCO	18,200	21,504	85%
KSHB	18,191	21,504	85%
WWOR	18,190	21,504	85%
KGO	18,062	21,504	84%
WCVB	18,058	21,504	84%
WBRZ	11,274	13,440	84%
WHDH	17,996	21,504	84%
KCRA	11,186	13,440	83%
WTTG	17,889	21,504	83%
WVLA	11,175	13,440	83%
WDIV	17,858	21,504	83%
KSL	11,157	13,440	83%
WAGA	17,811	21,504	83%
WBRC	11,095	13,440	83%
WNPA	17,719	21,504	82%
KSDK	17,703	21,504	82%
WXIX	17,701	21,504	82%
WNCT	11,015	13,440	82%
WMC	10,980	13,440	82%
WLEX	10,889	13,440	81%
WLTV	17,412	21,504	81%
WFLD	17,401	21,504	81%
WRC	17,334	21,504	81%
WFXT	17,328	21,504	81%
KMBC	17,312	21,504	81%
KTVT	12,977	16,128	80%
WTXF	17,216	21,504	80%
KNBC	17,203	21,504	80%
WPXI	17,175	21,504	80%

Year 2003 Viewing Statistics

Source: nielsen.txt

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
WBZ	17,132	21,504	80%
KCAL	16,989	21,504	79%
WFQX	10,491	13,440	78%
WTAE	16,717	21,504	78%
WNYW	16,705	21,504	78%
WCAU	16,348	21,504	76%
WPHL	16,117	21,504	75%
WSMV	10,061	13,440	75%
WJZ	16,094	21,504	75%
WTVF	9,994	13,440	74%
WBAL	15,677	21,504	73%
WXIA	15,510	21,504	72%
WKBD	15,426	21,504	72%
KABC	15,162	21,504	71%
WSEE	9,418	13,440	70%
WSYX	9,362	13,440	70%
KTLA	14,874	21,504	69%
KARK	9,287	13,440	69%
WKYT	9,261	13,440	69%
WUSA	14,764	21,504	69%
WSBK	14,651	21,504	68%
WLKY	8,930	13,440	66%
WGN	14,214	21,504	66%
WNBC	14,186	21,504	66%
WIS	8,721	13,440	65%
KTHV	8,684	13,440	65%
WSB	13,402	21,504	62%
KMGH	10,015	16,128	62%
WUAB	9,759	16,128	61%

Year 2003 Viewing Statistics

Source: nielsen.txt

Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View
KUSA	9,498	16,128	59%
KCNC	9,250	16,128	57%
KWTV	7,378	13,440	55%
KATV	7,334	13,440	55%
KWGN	8,671	16,128	54%
WFAA	8,589	16,128	53%
KFOR	6,970	13,440	52%
WPIX	10,951	21,504	51%
WTBS	10,711	21,504	50%
WBNS	5,070	13,440	38%

Exhibit 5: Stations with 50% or More "Zero" Observations

Year	Total Stations	Stations with 50% or More	
		"Zero" Observations	Percent of Total
2000	89	79	89%
2001	101	98	97%
2002	122	119	98%
2003	126	124	98%

Source: Exhibit 4

Year 2000 Viewing Statistics

Source Views: niel00.txt

Source Distant: Copy of distant stations - working copy.xls

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
1	WGN	13,168	21,504	61%	34,764,247	30,253,610	\$ 50,524,248.00	\$ 47,754,978.00
2	WPIX	7,807	21,504	36%	2,533,703	2,324,426	\$ 3,195,028.00	\$ 3,119,073.00
3	WSBK	13,800	21,504	64%	750,861	657,394	\$ 824,259.00	\$ 803,009.00
4	KTLA	12,540	21,504	58%	689,106	631,401	\$ 1,046,946.00	\$ 1,034,125.00
5	WUAB	9,319	16,128	58%	686,344	639,285	\$ 818,432.00	\$ 799,642.00
6	WWOR	15,311	21,504	71%	559,362	523,246	\$ 827,898.00	\$ 811,750.00
7	WKBD	15,202	21,504	71%	452,604	415,000	\$ 453,274.00	\$ 448,363.00
8	WPHL	16,010	21,504	74%	450,064	412,903	\$ 436,883.00	\$ 423,811.00
9	WNBC	13,862	21,504	64%	349,939	312,175	\$ 140,056.00	\$ 136,095.00
10	WIS	9,447	13,440	70%	248,182	227,905	\$ 106,619.00	\$ 100,900.00
11	WVTV	18,871	21,504	88%	245,157	231,241	\$ 192,858.00	\$ 189,462.00
12	WXIX	18,204	21,504	85%	226,434	212,974	\$ 222,742.00	\$ 217,198.00
13	KGO	16,122	21,504	75%	221,344	213,697	\$ 122,856.00	\$ 122,586.00
14	WISN	17,711	18,816	94%	220,088	212,363	\$ 154,234.00	\$ 153,815.00
15	KCAL	15,682	21,504	73%	218,850	212,117	\$ 432,167.00	\$ 430,298.00
16	WBAL	15,299	21,504	71%	213,882	207,007	\$ 218,831.00	\$ 216,839.00
17	WTFX	17,004	21,504	79%	211,275	194,876	\$ 268,566.00	\$ 264,950.00
18	WPSG	18,771	21,504	87%	208,306	197,051	\$ 384,230.00	\$ 380,564.00
19	WTMJ	20,245	21,504	94%	207,459	199,665	\$ 41,526.00	\$ 41,054.00
20	KMSP	15,345	21,504	71%	205,550	139,723	\$ 227,215.00	\$ 209,211.00
21	WFAA	7,682	16,128	48%	198,577	149,696	\$ 104,529.00	\$ 97,822.00
22	KWGN	8,141	16,128	50%	197,143	110,922	\$ 304,025.00	\$ 265,394.00
23	WXIA	15,319	21,504	71%	191,030	159,287	\$ 76,805.00	\$ 70,827.00
24	WSB	12,736	21,504	59%	190,672	166,478	\$ 113,401.00	\$ 109,323.00
25	WSEE	8,581	13,440	64%	183,261	168,769	\$ 79,100.00	\$ 76,935.00
26	WJZ	16,166	21,504	75%	180,682	172,787	\$ 128,169.00	\$ 126,074.00
27	WBRE	11,455	13,440	85%	174,438	163,950	\$ 69,041.00	\$ 67,458.00
28	WNYW	15,545	21,504	72%	173,735	148,154	\$ 220,884.00	\$ 216,998.00
29	WKRN	10,635	13,440	79%	166,231	144,405	\$ 72,505.00	\$ 70,446.00
30	WBNS	4,730	13,440	35%	162,185	141,466	\$ 58,966.00	\$ 55,990.00
31	KTNC	18,265	18,816	97%	162,006	159,730	\$ 153,200.00	\$ 152,653.00
32	KCNC	9,070	16,128	56%	161,005	93,453	\$ 103,962.00	\$ 93,611.00
33	KRON	19,387	21,504	90%	149,310	145,280	\$ 86,574.00	\$ 86,082.00
34	WCFT	12,396	13,440	92%	147,516	113,474	\$ 71,019.00	\$ 63,855.00

Year 2000 Viewing Statistics

Source Views: niel00.txt

Source Distant: Copy of distant stations - working copy.xls

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
35	KATV	6,681	13,440	50%	144,605	101,739	\$ 85,645.00	\$ 78,045.00
36	WCAU	15,458	21,504	72%	141,773	137,011	\$ 57,464.00	\$ 57,409.00
37	KCOP	17,969	21,504	84%	137,843	133,815	\$ 302,510.00	\$ 301,624.00
38	KICU	18,983	21,504	88%	137,800	125,305	\$ 96,739.00	\$ 92,679.00
39	KARK	8,659	13,440	64%	133,109	105,916	\$ 86,927.00	\$ 81,668.00
40	KMGH	8,496	16,128	53%	128,369	47,110	\$ 34,935.00	\$ 22,534.00
41	WPVI	19,405	21,504	90%	123,639	118,877	\$ 50,405.00	\$ 50,350.00
42	KCRA	10,883	13,440	81%	122,560	118,258	\$ 172,578.00	\$ 172,231.00
43	KUSA	9,121	16,128	57%	122,133	54,578	\$ 42,323.00	\$ 34,226.00
44	KSHB	17,596	21,504	82%	119,437	97,698	\$ 95,872.00	\$ 93,271.00
45	WUNI	17,032	21,504	79%	118,845	118,385	\$ 97,973.00	\$ 97,959.00
46	KNBC	16,357	21,504	76%	116,086	107,092	\$ 48,104.00	\$ 46,101.00
47	WDCA	16,889	21,504	79%	115,683	90,507	\$ 163,459.00	\$ 152,812.00
48	WAGA	16,653	21,504	77%	114,327	87,753	\$ 115,673.00	\$ 108,071.00
49	WBZ	17,726	21,504	82%	112,220	97,523	\$ 120,434.00	\$ 118,017.00
50	WIAT	12,747	13,440	95%	110,372	99,372	\$ 53,768.00	\$ 52,482.00
51	KDKA	18,260	21,504	85%	108,842	102,958	\$ 36,743.00	\$ 36,396.00
52	WKYT	9,515	13,440	71%	107,347	39,379	\$ 35,714.00	\$ 27,137.00
53	KXTX	12,602	16,128	78%	105,349	82,370	\$ 104,728.00	\$ 97,613.00
54	KYW	20,365	21,504	95%	102,752	97,990	\$ 70,913.00	\$ 70,858.00
55	KPLR	17,763	21,504	83%	102,555	92,500	\$ 156,296.00	\$ 151,955.00
56	KMBC	16,805	21,504	78%	100,962	81,422	\$ 29,444.00	\$ 27,403.00
57	KABC	13,451	21,504	63%	99,800	94,534	\$ 45,941.00	\$ 45,585.00
58	KSDK	16,787	21,504	78%	97,472	85,743	\$ 56,739.00	\$ 55,323.00
59	WSYX	7,832	13,440	58%	96,244	78,465	\$ 37,477.00	\$ 34,534.00
60	WGCL	12,685	13,440	94%	94,877	81,365	\$ 104,008.00	\$ 102,774.00
61	WDIV	17,952	21,504	83%	91,758	73,940	\$ 26,732.00	\$ 24,574.00
62	KTHV	9,053	13,440	67%	90,303	75,452	\$ 37,452.00	\$ 34,232.00
63	WPXI	17,039	21,504	79%	90,263	66,628	\$ 36,110.00	\$ 28,353.00
64	WLVI	19,733	21,504	92%	90,105	90,001	\$ 104,301.00	\$ 104,301.00
65	WBPX	20,711	21,504	96%	89,613	88,719	\$ 61,694.00	\$ 61,670.00
66	WHUB	5,349	5,376	99%	88,273	88,273	\$ 97,364.00	\$ 97,364.00
67	WUSA	13,985	21,504	65%	87,231	69,413	\$ 40,299.00	\$ 38,739.00
68	KPIX	18,636	21,504	87%	87,172	79,033	\$ 86,797.00	\$ 83,896.00

Year 2000 Viewing Statistics**Source Views: niel00.txt****Source Distant: Copy of distant stations - working copy.xls**

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
69	WTRF	12,050	13,440	90%	87,053	80,921	\$ 134,482.00	\$ 133,331.00
70	WTAE	15,674	21,504	73%	85,244	79,350	\$ 37,746.00	\$ 37,037.00
71	KTVU	17,831	21,504	83%	83,405	74,261	\$ 102,880.00	\$ 99,596.00
72	KPTV	8,624	13,440	64%	83,225	63,153	\$ 156,817.00	\$ 145,365.00
73	WITN	12,439	13,440	93%	80,461	72,711	\$ 29,700.00	\$ 28,750.00
74	KBWB	20,897	21,504	97%	79,924	79,208	\$ 46,808.00	\$ 46,662.00
75	WFQX	7,515	10,752	70%	79,337	62,360	\$ 91,185.00	\$ 85,210.00
76	WFLD	17,211	21,504	80%	78,535	61,353	\$ 95,125.00	\$ 88,689.00
77	WRIC	11,507	13,440	86%	78,523	74,315	\$ 62,669.00	\$ 62,514.00
78	WTVD	12,351	13,440	92%	73,628	68,276	\$ 68,083.00	\$ 67,558.00
79	KTXL	13,157	13,440	98%	72,748	70,291	\$ 101,628.00	\$ 100,803.00
80	WBRC	11,394	13,440	85%	72,109	68,326	\$ 60,924.00	\$ 60,131.00
81	WBZL	18,545	21,504	86%	70,455	61,134	\$ 57,424.00	\$ 56,025.00
82	WGKI	1,520	2,688	57%
83	WGNX	7,588	8,064	94%

Year 2001 Viewing Statistics

Source Views: *niel01.txt*

Source Distant: *Copy of MKFXSM01_DISTANTSTATIONS_2001 - working copy.xls*

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
1	WGN	9,770	16,128	61%	32,026,304	28,608,200	\$ 47,897,550.00	\$ 46,139,465.00
2	WPIX	6,119	16,128	38%	2,500,563	2,320,116	\$ 3,462,937.00	\$ 3,405,032.00
3	WUAB	8,700	13,440	65%	758,308	733,059	\$ 962,184.00	\$ 955,531.00
4	KTLA	9,976	16,128	62%	657,028	619,070	\$ 1,116,635.00	\$ 1,104,876.00
5	WSBK	9,996	16,128	62%	612,404	555,701	\$ 725,574.00	\$ 713,415.00
6	WPHL	11,890	16,128	74%	570,492	542,930	\$ 611,400.00	\$ 600,760.00
7	WNBC	9,649	16,128	60%	552,515	517,710	\$ 282,970.00	\$ 279,067.00
8	WWOR	11,896	16,128	74%	478,579	462,751	\$ 777,091.00	\$ 774,285.00
9	WPSG	13,967	16,128	87%	467,238	453,729	\$ 776,735.00	\$ 773,514.00
10	KTNC	15,839	16,128	98%	429,758	427,487	\$ 451,912.00	\$ 451,844.00
11	WKBD	11,499	16,128	71%	350,591	311,149	\$ 395,843.00	\$ 387,131.00
12	WSEE	6,980	10,752	65%	335,091	317,556	\$ 191,242.00	\$ 188,327.00
13	WKRN	8,573	10,752	80%	296,304	272,715	\$ 176,287.00	\$ 174,071.00
14	WLTV	7,116	10,752	66%	257,914	239,353	\$ 270,022.00	\$ 267,065.00
15	WBNS	4,218	10,752	39%	256,989	242,630	\$ 118,506.00	\$ 116,900.00
16	KGO	12,772	16,128	79%	248,703	245,947	\$ 189,287.00	\$ 189,031.00
17	KCAL	11,938	16,128	74%	242,168	238,382	\$ 494,060.00	\$ 493,469.00
18	WTFX	12,228	16,128	76%	241,563	229,934	\$ 374,595.00	\$ 371,135.00
19	WBRE	8,805	10,752	82%	234,573	229,488	\$ 108,761.00	\$ 107,766.00
20	WJZ	11,913	16,128	74%	225,087	214,679	\$ 158,403.00	\$ 153,672.00
21	WNYW	11,503	16,128	71%	222,444	203,425	\$ 315,922.00	\$ 314,045.00
22	WXIX	13,874	16,128	86%	218,803	201,847	\$ 279,598.00	\$ 273,881.00
23	WIS	7,113	10,752	66%	205,404	191,972	\$ 108,273.00	\$ 104,034.00
24	WFAA	6,648	13,440	49%	199,945	163,183	\$ 123,055.00	\$ 117,250.00
25	WBAL	10,749	16,128	67%	195,589	185,400	\$ 168,977.00	\$ 166,495.00
26	WSB	9,663	16,128	60%	189,041	162,126	\$ 115,846.00	\$ 111,347.00
27	KMSP	11,313	16,128	70%	181,734	126,155	\$ 296,758.00	\$ 283,991.00
28	KWGN	7,479	13,440	56%	169,397	109,934	\$ 245,239.00	\$ 218,935.00
29	KCRA	8,728	10,752	81%	163,480	153,500	\$ 222,190.00	\$ 220,767.00
30	WXIA	11,161	16,128	69%	162,596	141,047	\$ 61,776.00	\$ 59,571.00
31	WCAU	11,277	16,128	70%	156,620	154,955	\$ 70,739.00	\$ 70,718.00
32	WDIV	13,516	16,128	84%	155,727	145,869	\$ 50,667.00	\$ 49,979.00
33	KARK	7,176	10,752	67%	153,483	139,188	\$ 93,282.00	\$ 90,009.00
34	WPVI	14,571	16,128	90%	147,761	146,096	\$ 70,574.00	\$ 70,553.00

Year 2001 Viewing Statistics

Source Views: *niel01.txt*

Source Distant: *Copy of MKFXSM01_DISTANTSTATIONS_2001 - working copy.xls*

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
35	KATV	5,969	10,752	56%	143,606	116,399	\$ 88,000.00	\$ 78,792.00
36	WISN	15,339	16,128	95%	142,572	142,572	\$ 152,820.00	\$ 152,820.00
37	KCOP	13,529	16,128	84%	142,258	139,017	\$ 232,990.00	\$ 232,437.00
38	KNBC	11,875	16,128	74%	141,094	136,826	\$ 60,609.00	\$ 60,317.00
39	WVTV	14,956	16,128	93%	138,847	138,660	\$ 140,498.00	\$ 140,461.00
40	KYW	15,442	16,128	96%	137,885	136,220	\$ 113,354.00	\$ 113,333.00
41	KDKA	13,998	16,128	87%	137,565	132,111	\$ 48,940.00	\$ 48,828.00
42	WBZL	13,549	16,128	84%	136,508	133,299	\$ 100,409.00	\$ 100,150.00
43	KABC	10,089	16,128	63%	135,587	132,346	\$ 58,391.00	\$ 58,140.00
44	WSYX	7,055	10,752	66%	134,740	124,831	\$ 82,778.00	\$ 82,145.00
45	KICU	14,469	16,128	90%	133,536	129,305	\$ 111,214.00	\$ 109,618.00
46	WTMJ	14,984	16,128	93%	131,048	131,048	\$ 32,619.00	\$ 32,619.00
47	KRON	14,479	16,128	90%	130,215	127,819	\$ 49,381.00	\$ 49,189.00
48	WDCA	12,822	16,128	80%	130,060	113,296	\$ 183,366.00	\$ 176,647.00
49	WUSA	10,516	16,128	65%	122,325	112,075	\$ 55,589.00	\$ 54,841.00
50	KCNC	8,158	13,440	61%	119,009	71,765	\$ 75,342.00	\$ 66,211.00
51	WRIC	9,428	10,752	88%	116,702	116,102	\$ 90,298.00	\$ 90,288.00
52	KTHV	6,845	10,752	64%	109,844	97,998	\$ 52,701.00	\$ 49,795.00
53	KXTX	11,222	13,440	83%	108,510	94,879	\$ 126,398.00	\$ 121,511.00
54	WTAE	12,022	16,128	75%	105,937	98,017	\$ 81,262.00	\$ 79,592.00
55	KTVU	13,367	16,128	83%	105,831	94,514	\$ 116,989.00	\$ 113,370.00
56	WWBT	9,717	10,752	90%	100,388	97,439	\$ 55,815.00	\$ 55,649.00
57	WBZ	13,265	16,128	82%	98,162	87,316	\$ 43,639.00	\$ 41,288.00
58	KMGH	7,972	13,440	59%	97,413	37,708	\$ 37,093.00	\$ 28,597.00
59	WIAT	10,192	10,752	95%	93,774	91,658	\$ 44,131.00	\$ 43,856.00
60	WKYT	7,870	10,752	73%	92,367	57,916	\$ 47,797.00	\$ 42,780.00
61	KUSA	8,199	13,440	61%	91,596	51,602	\$ 39,775.00	\$ 31,327.00
62	KPLR	13,292	16,128	82%	91,516	67,973	\$ 129,983.00	\$ 116,039.00
63	KSHB	12,944	16,128	80%	87,485	60,483	\$ 86,323.00	\$ 83,575.00
64	WGCL	15,301	16,128	95%	85,359	74,292	\$ 94,845.00	\$ 94,132.00
65	KSDK	12,385	16,128	77%	85,041	65,880	\$ 45,455.00	\$ 42,976.00
66	KBWB	15,602	16,128	97%	85,013	85,013	\$ 56,930.00	\$ 56,930.00
67	KPTV	6,979	10,752	65%	84,374	67,018	\$ 161,136.00	\$ 153,722.00
68	WFQX	7,425	10,752	69%	84,260	68,421	\$ 137,573.00	\$ 130,433.00

Year 2001 Viewing Statistics

Source Views: niel01.txt

Source Distant: Copy of MKFXSM01_DISTANTSTATIONS_2001 - working copy.xls

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
69	WTTG	7,250	10,752	67%	84,136	83,931	\$ 96,881.00	\$ 96,850.00
70	WITN	10,358	10,752	96%	83,560	73,378	\$ 27,018.00	\$ 25,804.00
71	WMAR	10,248	10,752	95%	79,669	77,634	\$ 44,961.00	\$ 44,516.00
72	KMBC	12,748	16,128	79%	78,638	58,371	\$ 20,751.00	\$ 19,266.00
73	WRC	7,832	10,752	73%	78,372	75,988	\$ 27,174.00	\$ 26,810.00
74	WCMH	8,655	10,752	80%	77,987	74,408	\$ 18,468.00	\$ 18,406.00
75	WFLD	13,137	16,128	81%	77,731	55,113	\$ 103,557.00	\$ 93,614.00
76	WLYH	9,753	10,752	91%	75,892	68,314	\$ 420,580.00	\$ 418,640.00
77	WCVB	8,291	10,752	77%	75,885	75,048	\$ 52,862.00	\$ 52,822.00
78	WTVD	9,949	10,752	93%	75,523	69,942	\$ 58,205.00	\$ 57,557.00
79	WPGH	9,251	10,752	86%	74,083	61,574	\$ 93,039.00	\$ 90,886.00
80	WPXI	12,635	16,128	78%	73,923	51,425	\$ 42,523.00	\$ 30,646.00
81	KTXL	10,552	10,752	98%	69,608	69,138	\$ 103,953.00	\$ 103,823.00
82	WTAJ	9,638	10,752	90%	69,201	50,233	\$ 36,135.00	\$ 32,775.00
83	KFOR	5,400	10,752	50%	67,542	56,502	\$ 31,857.00	\$ 30,773.00
84	WNWO	9,932	10,752	92%	66,778	62,701	\$ 17,429.00	\$ 17,174.00
85	WAGA	12,156	16,128	75%	66,675	43,613	\$ 62,757.00	\$ 57,232.00
86	WGAL	9,126	10,752	85%	66,445	63,795	\$ 47,718.00	\$ 47,583.00
87	WALA	9,748	10,752	91%	66,412	65,230	\$ 165,610.00	\$ 165,571.00
88	KWTV	5,962	10,752	55%	64,195	51,289	\$ 30,297.00	\$ 26,796.00
89	WUNI	12,233	16,128	76%	62,329	62,128	\$ 40,486.00	\$ 40,468.00
90	WBRZ	8,625	10,752	80%	60,566	45,945	\$ 43,182.00	\$ 36,945.00
91	WCCO	7,481	10,752	70%	60,267	45,832	\$ 13,958.00	\$ 13,047.00
92	WPTY	8,796	10,752	82%	59,562	35,703	\$ 20,301.00	\$ 13,367.00
93	KPIX	5,376	5,376	100%	54,190	53,215	\$ 49,903.00	\$ 49,884.00
94	WLVI	5,376	5,376	100%	50,542	50,542	\$ 81,968.00	\$ 81,968.00
95	WDRB	9,501	10,752	88%	49,377	31,651	\$ 134,628.00	\$ 128,670.00
96	KSTW	9,278	10,752	86%	48,499	39,858	\$ 164,586.00	\$ 158,301.00
97	WPMT	9,855	10,752	92%	48,215	45,140	\$ 323,221.00	\$ 322,867.00
98	WPBX	5,376	5,376	100%	39,777	37,503	\$ 30,929.00	\$ 30,670.00
99	WPCB	10,517	10,752	98%	35,529	29,487	\$ 139,470.00	\$ 137,238.00
100	WKPT	10,610	10,752	99%	32,699	22,441	\$ 216,542.00	\$ 211,642.00
101	WHUB	2,688	2,688	100%

Year 2001 Viewing Statistics**Source Views: niel01.txt****Source Distant: Copy of MKFXSM01_DISTANTSTATIONS_2001 - working copy.xls**

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
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Year 2002 Viewing Statistics
Source Views: niel02_reg_sta.txt and niel02_sup_sta.txt
Source Distant: Copy of 2002_DistantStations_ALL FORMS_040322 from CDC - working.xls

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
1	WGN	13,597	21,504	63%	34,016,201	30,949,605	\$ 53,627,682.00	\$ 51,713,383.00
2	WPIX	10,322	21,504	48%	2,098,975	1,940,787	\$ 3,224,803.00	\$ 3,174,506.00
3	WUAB	10,148	16,128	63%	749,972	723,647	\$ 869,718.00	\$ 864,729.00
4	KTLA	14,360	21,504	67%	625,663	593,652	\$ 1,024,683.00	\$ 1,010,814.00
5	WSBK	13,724	21,504	64%	612,541	564,056	\$ 682,290.00	\$ 673,387.00
6	WPHL	16,040	21,504	75%	512,848	489,674	\$ 599,666.00	\$ 589,832.00
7	KPTV	9,248	13,440	69%	504,363	493,461	\$ 369,674.00	\$ 364,758.00
8	KATU	6,936	13,440	52%	468,610	465,927	\$ 82,152.00	\$ 81,894.00
9	KGW	9,885	13,440	74%	452,492	448,209	\$ 71,510.00	\$ 71,326.00
10	WNBC	13,620	21,504	63%	449,897	416,031	\$ 241,159.00	\$ 237,671.00
11	WWOR	17,406	21,504	81%	441,863	427,033	\$ 766,883.00	\$ 763,035.00
12	WKBD	15,381	21,504	72%	399,417	380,619	\$ 483,779.00	\$ 478,189.00
13	KTNC	20,395	21,504	95%	383,312	379,525	\$ 479,098.00	\$ 478,083.00
14	WBNS	5,217	13,440	39%	347,325	328,230	\$ 85,303.00	\$ 82,802.00
15	WPSG	18,768	21,504	87%	314,878	301,650	\$ 626,639.00	\$ 622,546.00
16	WTFX	17,174	21,504	80%	272,141	260,327	\$ 460,940.00	\$ 457,212.00
17	WIS	8,804	13,440	66%	265,911	253,590	\$ 146,236.00	\$ 141,509.00
18	WFAA	8,232	16,128	51%	264,447	213,908	\$ 177,572.00	\$ 169,040.00
19	WSYX	9,020	13,440	67%	259,795	251,695	\$ 43,797.00	\$ 43,249.00
20	WXIX	17,888	21,504	83%	240,684	229,117	\$ 253,133.00	\$ 251,032.00
21	WSEE	8,913	13,440	66%	234,135	220,681	\$ 156,704.00	\$ 154,444.00
22	KCAL	16,276	21,504	76%	221,142	216,678	\$ 389,744.00	\$ 389,024.00
23	KGO	17,730	21,504	82%	218,042	213,702	\$ 201,280.00	\$ 201,015.00
24	WKRN	11,558	13,440	86%	213,231	191,433	\$ 137,795.00	\$ 135,505.00
25	WEWS	14,991	16,128	93%	207,543	204,209	\$ 30,735.00	\$ 30,622.00
26	WVTV	20,326	21,504	95%	206,307	201,130	\$ 286,372.00	\$ 283,556.00
27	WLIO	10,546	13,440	78%	199,099	189,574	\$ 20,956.00	\$ 20,625.00
28	WSB	13,727	21,504	64%	197,550	174,718	\$ 129,020.00	\$ 123,076.00
29	WPVI	20,110	21,504	94%	195,895	194,193	\$ 88,069.00	\$ 88,040.00
30	WNYW	16,633	21,504	77%	191,661	179,989	\$ 292,103.00	\$ 290,595.00
31	KMSP	17,404	21,504	81%	188,185	132,921	\$ 320,962.00	\$ 306,644.00
32	KWGN	8,384	16,128	52%	185,704	120,253	\$ 236,159.00	\$ 200,902.00
33	WXIA	15,026	21,504	70%	180,749	157,115	\$ 76,613.00	\$ 74,266.00
34	WBRE	11,477	13,440	85%	172,990	167,582	\$ 81,249.00	\$ 80,249.00

Year 2002 Viewing Statistics
Source Views: niel02_reg_sta.txt and niel02_sup_sta.txt
Source Distant: Copy of 2002_DistantStations_ALL FORMS_040322 from CDC - working.xls

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
35	WJW	14,827	16,128	92%	170,369	167,035	\$ 60,297.00	\$ 59,847.00
36	WCAU	15,890	21,504	74%	170,063	168,361	\$ 80,232.00	\$ 80,203.00
37	WPXS	20,937	21,504	97%	166,827	166,541	\$ 217,880.00	\$ 217,676.00
38	WSFJ	13,176	13,440	98%	166,723	166,723	\$ 57,527.00	\$ 57,527.00
39	WUNI	13,295	18,816	71%	165,914	165,914	\$ 138,279.00	\$ 138,279.00
40	KCRA	10,773	13,440	80%	165,105	158,629	\$ 231,240.00	\$ 230,531.00
41	WTLW	13,420	13,440	100%	164,343	162,969	\$ 52,982.00	\$ 52,921.00
42	WWHO	13,148	13,440	98%	163,878	163,714	\$ 53,564.00	\$ 53,564.00
43	KATV	7,349	13,440	55%	149,714	116,590	\$ 110,589.00	\$ 99,704.00
44	WISN	20,536	21,504	95%	146,743	145,296	\$ 175,454.00	\$ 175,155.00
45	WTMJ	19,694	21,504	92%	146,743	145,296	\$ 54,156.00	\$ 53,857.00
46	WJZ	16,548	21,504	77%	146,008	141,075	\$ 135,625.00	\$ 134,841.00
47	KYW	20,723	21,504	96%	145,369	143,667	\$ 120,076.00	\$ 120,047.00
48	WDIV	18,296	21,504	85%	144,219	137,039	\$ 44,863.00	\$ 44,157.00
49	WBAL	15,553	21,504	72%	133,044	125,721	\$ 107,760.00	\$ 106,480.00
50	KNBC	16,939	21,504	79%	131,177	127,757	\$ 44,005.00	\$ 43,905.00
51	KABC	14,435	21,504	67%	126,326	122,372	\$ 61,184.00	\$ 61,010.00
52	KCNC	9,802	16,128	61%	124,263	74,579	\$ 92,185.00	\$ 83,415.00
53	KCOP	18,527	21,504	86%	123,555	120,645	\$ 253,321.00	\$ 252,994.00
54	KTHV	8,270	13,440	62%	120,966	103,497	\$ 68,264.00	\$ 64,462.00
55	KARK	9,040	13,440	67%	120,944	101,917	\$ 67,971.00	\$ 64,040.00
56	WIAT	12,768	13,440	95%	119,473	117,388	\$ 66,270.00	\$ 65,950.00
57	WBRZ	10,811	13,440	80%	114,590	97,219	\$ 119,214.00	\$ 111,245.00
58	WDCA	17,476	21,504	81%	114,543	103,082	\$ 186,859.00	\$ 183,281.00
59	WLVI	19,894	21,504	93%	113,289	113,289	\$ 105,652.00	\$ 105,652.00
60	KDKA	18,565	21,504	86%	112,871	108,483	\$ 41,334.00	\$ 41,202.00
61	KMGH	9,832	16,128	61%	108,284	44,918	\$ 57,066.00	\$ 45,042.00
62	KMBC	17,552	21,504	82%	101,489	75,577	\$ 27,323.00	\$ 25,413.00
63	KTVU	17,865	21,504	83%	98,504	88,482	\$ 103,031.00	\$ 99,298.00
64	KSHB	17,616	21,504	82%	98,312	69,767	\$ 94,843.00	\$ 92,267.00
65	WGCL	20,119	21,504	94%	94,267	84,089	\$ 104,930.00	\$ 104,253.00
66	KICU	18,494	21,504	86%	93,945	89,359	\$ 75,872.00	\$ 72,964.00
67	WGGB	13,163	13,440	98%	92,959	89,325	\$ 100,961.00	\$ 100,566.00
68	WTAE	16,452	21,504	77%	92,015	84,608	\$ 51,672.00	\$ 50,182.00

Year 2002 Viewing Statistics
Source Views: niel02_reg_sta.txt and niel02_sup_sta.txt
Source Distant: Copy of 2002_DistantStations_ALL FORMS_040322 from CDC - working.xls

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
69	KPLR	17,904	21,504	83%	91,789	76,547	\$ 134,629.00	\$ 128,717.00
70	KUSA	9,624	16,128	60%	90,416	52,749	\$ 41,918.00	\$ 34,417.00
71	WBZ	17,405	21,504	81%	87,207	85,547	\$ 47,492.00	\$ 47,438.00
72	WFQX	9,499	13,440	71%	86,260	73,768	\$ 155,776.00	\$ 149,849.00
73	WUSA	15,067	21,504	70%	82,558	76,565	\$ 49,863.00	\$ 49,679.00
74	WKYT	9,142	13,440	68%	82,323	44,728	\$ 24,407.00	\$ 20,407.00
75	WCVB	18,069	21,504	84%	82,246	80,587	\$ 54,777.00	\$ 54,723.00
76	WFLD	16,666	21,504	78%	81,933	60,309	\$ 96,535.00	\$ 83,708.00
77	WITN	12,718	13,440	95%	81,663	73,257	\$ 26,162.00	\$ 25,306.00
78	KSDK	17,184	21,504	80%	81,485	67,226	\$ 46,510.00	\$ 45,094.00
79	WLYH	12,563	13,440	93%	81,401	69,964	\$ 453,370.00	\$ 450,162.00
80	WRIC	11,671	13,440	87%	78,977	78,361	\$ 64,764.00	\$ 64,735.00
81	WGME	13,307	13,440	99%	78,774	78,415	\$ 38,503.00	\$ 38,503.00
82	WAFB	11,783	13,440	88%	78,629	72,519	\$ 58,126.00	\$ 56,988.00
83	WTVD	12,350	13,440	92%	77,281	73,821	\$ 63,006.00	\$ 62,548.00
84	WNCT	10,743	13,440	80%	77,148	71,842	\$ 136,557.00	\$ 136,200.00
85	KSL	10,669	13,440	79%	76,995	62,830	\$ 85,895.00	\$ 83,150.00
86	WALA	12,341	13,440	92%	74,319	72,664	\$ 182,931.00	\$ 182,873.00
87	WHDH	18,328	21,504	85%	74,085	72,426	\$ 14,821.00	\$ 14,767.00
88	WBRC	10,634	13,440	79%	72,012	68,164	\$ 67,053.00	\$ 65,708.00
89	KXTX	15,780	16,128	98%	68,174	53,247	\$ 96,938.00	\$ 91,752.00
90	WMAQ	19,023	21,504	88%	67,620	63,444	\$ 27,716.00	\$ 27,148.00
91	KCBS	17,816	21,504	83%	67,461	63,600	\$ 63,993.00	\$ 63,490.00
92	KTXL	13,288	13,440	99%	66,371	65,839	\$ 104,579.00	\$ 104,411.00
93	WAGA	17,628	21,504	82%	64,715	43,354	\$ 68,641.00	\$ 61,192.00
94	KRON	20,657	21,504	96%	64,037	61,864	\$ 49,166.00	\$ 48,915.00
95	WTOV	12,637	13,440	94%	63,730	62,384	\$ 83,970.00	\$ 83,946.00
96	KPIX	19,073	21,504	89%	62,474	61,474	\$ 76,695.00	\$ 76,677.00
97	KWTV	8,066	13,440	60%	62,168	48,561	\$ 36,296.00	\$ 32,817.00
98	WLKY	8,774	13,440	65%	60,301	43,629	\$ 53,858.00	\$ 52,660.00
99	WBBM	19,616	21,504	91%	60,169	58,800	\$ 25,706.00	\$ 25,690.00
100	WTRF	12,797	13,440	95%	59,446	55,694	\$ 111,217.00	\$ 111,010.00
101	WWBT	12,008	13,440	89%	58,578	55,558	\$ 38,930.00	\$ 38,726.00
102	KFOR	6,869	13,440	51%	56,577	44,667	\$ 29,611.00	\$ 28,626.00

Year 2002 Viewing Statistics
Source Views: niel02_reg_sta.txt and niel02_sup_sta.txt
Source Distant: Copy of 2002_DistantStations_ALL FORMS_040322 from CDC - working.xls

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
103	WCHS	11,438	13,440	85%	52,707	42,888	\$ 48,151.00	\$ 44,700.00
104	KSTW	14,750	16,128	91%	50,887	47,167	\$ 115,040.00	\$ 113,216.00
105	KBHK	20,999	21,504	98%	49,931	49,807	\$ 155,901.00	\$ 155,875.00
106	KDFW	12,251	16,128	76%	49,742	26,018	\$ 49,668.00	\$ 37,196.00
107	WNWO	12,939	13,440	96%	47,836	43,047	\$ 10,055.00	\$ 9,980.00
108	WFTC	20,094	21,504	93%	47,612	35,262	\$ 156,881.00	\$ 154,417.00
109	WWLP	11,749	13,440	87%	45,303	42,073	\$ 14,636.00	\$ 14,249.00
110	WIBW	9,917	13,440	74%	43,871	25,926	\$ 12,548.00	\$ 10,781.00
111	WTBS	199	21,504	1%	43,248	9,426	\$ 23,122.00	\$ 10,393.00
112	KUVS	12,428	13,440	92%	42,448	42,448	\$ 136,081.00	\$ 136,081.00
113	WCWB	19,660	21,504	91%	42,315	34,971	\$ 42,083.00	\$ 39,973.00
114	WPMT	12,364	13,440	92%	41,766	39,509	\$ 179,356.00	\$ 179,014.00
115	WHBQ	10,701	13,440	80%	41,709	34,559	\$ 67,891.00	\$ 64,968.00
116	WCFT	11,398	13,440	85%	40,118	33,847	\$ 25,057.00	\$ 24,642.00
117	KMTV	12,571	13,440	94%	38,944	31,196	\$ 17,418.00	\$ 16,733.00
118	KETV	11,444	13,440	85%	37,578	31,196	\$ 20,844.00	\$ 20,236.00
119	WBZL	18,891	21,504	88%	37,092	34,238	\$ 103,593.00	\$ 102,286.00
120	WXIN	14,424	16,128	89%	29,737	29,575	\$ 120,117.00	\$ 120,054.00
121	WTGS	12,754	13,440	95%	24,705	24,203	\$ 185,137.00	\$ 185,041.00
122	WGTW	21,484	21,504	100%	7,925	7,925	\$ 117,142.00	\$ 117,142.00

Year 2003 Viewing Statistics
Source Views: nielsen.txt

Source Distant: Copy of 2003 distant comm'l stations for diary study.xlsx

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
1	WGN	14,214	21,504	66%	35,464,425	32,722,375	\$ 59,212,754.00	\$ 57,406,083.00
2	WPIX	10,951	21,504	51%	2,154,652	2,012,706	\$ 3,669,367.00	\$ 3,609,931.00
3	WUAB	9,759	16,128	61%	784,586	764,050	\$ 1,255,713.00	\$ 1,251,475.00
4	KTLA	14,874	21,504	69%	624,007	592,342	\$ 952,474.00	\$ 940,004.00
5	WSBK	14,651	21,504	68%	586,989	541,254	\$ 718,199.00	\$ 702,863.00
6	WNBC	14,186	21,504	66%	582,450	558,831	\$ 393,075.00	\$ 390,139.00
7	WPHL	16,117	21,504	75%	503,032	479,527	\$ 615,674.00	\$ 604,815.00
8	WWOR	18,190	21,504	85%	436,202	420,749	\$ 740,101.00	\$ 735,625.00
9	KTNC	21,082	21,504	98%	411,988	407,541	\$ 545,668.00	\$ 544,371.00
10	WSEE	9,418	13,440	70%	365,164	354,037	\$ 309,029.00	\$ 307,226.00
11	WKRN	11,898	13,440	89%	364,006	343,660	\$ 284,374.00	\$ 281,942.00
12	WPSG	18,861	21,504	88%	359,173	347,987	\$ 622,825.00	\$ 619,346.00
13	WKBD	15,426	21,504	72%	358,241	337,257	\$ 426,386.00	\$ 420,548.00
14	WTFX	17,216	21,504	80%	276,475	265,333	\$ 478,166.00	\$ 474,028.00
15	WIS	8,721	13,440	65%	274,470	262,521	\$ 147,153.00	\$ 141,636.00
16	WXIX	17,701	21,504	82%	250,274	241,102	\$ 245,083.00	\$ 241,476.00
17	KGO	18,062	21,504	84%	240,200	236,071	\$ 178,256.00	\$ 177,465.00
18	KCAL	16,989	21,504	79%	238,015	235,051	\$ 448,616.00	\$ 448,090.00
19	WFAA	8,589	16,128	53%	200,204	164,879	\$ 93,393.00	\$ 87,628.00
20	WJZ	16,094	21,504	75%	198,236	194,924	\$ 128,373.00	\$ 127,477.00
21	WBNS	5,070	13,440	38%	197,936	180,537	\$ 98,410.00	\$ 95,948.00
22	WVTV	20,637	21,504	96%	197,129	196,567	\$ 311,134.00	\$ 311,059.00
23	WNYW	16,705	21,504	78%	192,837	186,398	\$ 323,388.00	\$ 322,402.00
24	WSB	13,402	21,504	62%	188,740	159,560	\$ 127,508.00	\$ 121,124.00
25	WPVI	19,883	21,504	92%	181,634	179,857	\$ 74,520.00	\$ 74,478.00
26	KWGN	8,671	16,128	54%	176,367	108,469	\$ 238,331.00	\$ 206,040.00
27	KCOP	19,308	21,504	90%	164,099	162,664	\$ 400,555.00	\$ 400,540.00
28	WDIV	17,858	21,504	83%	163,636	155,308	\$ 115,141.00	\$ 114,339.00
29	WXIA	15,510	21,504	72%	162,029	138,676	\$ 77,116.00	\$ 74,796.00
30	WCAU	16,348	21,504	76%	156,605	154,828	\$ 65,966.00	\$ 65,924.00
31	KTVU	18,852	21,504	88%	154,702	140,302	\$ 123,133.00	\$ 116,380.00
32	WISN	20,788	21,504	97%	154,038	153,997	\$ 212,022.00	\$ 212,019.00
33	KCRA	11,186	13,440	83%	149,337	140,047	\$ 182,983.00	\$ 181,656.00
34	KATV	7,334	13,440	55%	147,130	121,596	\$ 106,923.00	\$ 103,137.00

Year 2003 Viewing Statistics
Source Views: nielsen.txt

Source Distant: Copy of 2003 distant comm'l stations for diary study.xlsx

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
35	WTMJ	19,981	21,504	93%	147,024	147,024	\$ 62,588.00	\$ 62,588.00
36	KMSP	20,379	21,504	95%	136,194	79,962	\$ 134,853.00	\$ 119,405.00
37	WBZL	18,914	21,504	88%	135,961	134,313	\$ 369,395.00	\$ 369,238.00
38	KICU	18,923	21,504	88%	135,938	131,890	\$ 106,055.00	\$ 102,923.00
39	WKYT	9,261	13,440	69%	134,791	100,908	\$ 59,312.00	\$ 55,537.00
40	KYW	20,570	21,504	96%	134,624	132,847	\$ 92,040.00	\$ 91,998.00
41	WBAL	15,677	21,504	73%	130,800	127,536	\$ 89,676.00	\$ 88,790.00
42	WLTW	17,412	21,504	81%	129,542	119,604	\$ 273,031.00	\$ 269,991.00
43	KNBC	17,203	21,504	80%	128,282	125,825	\$ 46,586.00	\$ 46,554.00
44	WUSA	14,764	21,504	69%	128,189	119,925	\$ 66,071.00	\$ 65,439.00
45	KARK	9,287	13,440	69%	123,216	106,589	\$ 68,402.00	\$ 65,610.00
46	WSYX	9,362	13,440	70%	122,467	113,437	\$ 40,412.00	\$ 39,523.00
47	KCNC	9,250	16,128	57%	118,062	74,506	\$ 100,424.00	\$ 93,942.00
48	WRIC	11,812	13,440	88%	116,010	115,537	\$ 96,500.00	\$ 96,439.00
49	WDCA	18,800	21,504	87%	112,831	101,148	\$ 158,256.00	\$ 153,988.00
50	WMLW	21,064	21,504	98%	107,727	107,727	\$ 120,256.00	\$ 120,256.00
51	KTHV	8,684	13,440	65%	107,716	92,934	\$ 50,728.00	\$ 48,174.00
52	WBZ	17,132	21,504	80%	104,965	103,433	\$ 47,811.00	\$ 47,741.00
53	KDKA	19,495	21,504	91%	102,629	98,660	\$ 47,012.00	\$ 46,915.00
54	KABC	15,162	21,504	71%	101,391	98,874	\$ 32,838.00	\$ 32,720.00
55	WTAE	16,717	21,504	78%	101,021	94,107	\$ 55,854.00	\$ 54,252.00
56	WWBT	12,281	13,440	91%	98,994	96,140	\$ 73,528.00	\$ 73,091.00
57	WBRZ	11,274	13,440	84%	98,515	84,954	\$ 78,275.00	\$ 71,536.00
58	WGCL	20,217	21,504	94%	93,712	82,300	\$ 115,104.00	\$ 114,426.00
59	KBWB	21,029	21,504	98%	93,414	93,414	\$ 63,150.00	\$ 63,150.00
60	WIAT	12,836	13,440	96%	93,269	91,361	\$ 57,370.00	\$ 57,056.00
61	WHDH	17,996	21,504	84%	92,685	91,280	\$ 23,869.00	\$ 23,802.00
62	WCVB	18,058	21,504	84%	91,640	90,807	\$ 62,210.00	\$ 62,172.00
63	WPXI	17,175	21,504	80%	91,471	77,157	\$ 46,043.00	\$ 43,197.00
64	KMGH	10,015	16,128	62%	89,251	31,577	\$ 30,480.00	\$ 17,955.00
65	KRON	20,860	21,504	97%	88,693	86,553	\$ 49,190.00	\$ 48,761.00
66	KMBC	17,312	21,504	81%	88,600	66,310	\$ 25,748.00	\$ 24,114.00
67	WITN	12,830	13,440	95%	87,567	86,820	\$ 36,918.00	\$ 36,880.00
68	KSHB	18,191	21,504	85%	85,050	64,071	\$ 88,080.00	\$ 86,197.00

Year 2003 Viewing Statistics
Source Views: nielsen.txt

Source Distant: Copy of 2003 distant comm'l stations for diary study.xlsx

Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
69	WFQX	10,491	13,440	78%	84,423	77,046	\$ 199,974.00	\$ 195,688.00
70	WTTG	17,889	21,504	83%	83,913	82,530	\$ 107,130.00	\$ 107,070.00
71	WTVD	12,314	13,440	92%	82,405	79,162	\$ 70,468.00	\$ 69,947.00
72	KPLR	18,258	21,504	85%	82,199	73,962	\$ 133,295.00	\$ 127,889.00
73	WLKY	8,930	13,440	66%	80,924	63,834	\$ 58,369.00	\$ 56,894.00
74	KUSA	9,498	16,128	59%	80,921	44,297	\$ 37,652.00	\$ 31,824.00
75	KSDK	17,703	21,504	82%	78,239	71,967	\$ 50,471.00	\$ 49,725.00
76	WLYH	12,331	13,440	92%	77,555	68,897	\$ 324,392.00	\$ 320,852.00
77	WFTC	19,606	21,504	91%	77,544	66,812	\$ 264,108.00	\$ 261,174.00
78	WCMH	11,635	13,440	87%	77,336	73,884	\$ 24,173.00	\$ 23,975.00
79	WBQC	21,301	21,504	99%	75,632	75,632	\$ 73,927.00	\$ 73,927.00
80	WMC	10,980	13,440	82%	74,594	69,875	\$ 16,035.00	\$ 15,842.00
81	WFLD	17,401	21,504	81%	74,114	60,040	\$ 96,467.00	\$ 89,298.00
82	WBRC	11,095	13,440	83%	73,741	68,883	\$ 77,753.00	\$ 75,963.00
83	WTVE	2,668	2,688	99%	72,841	72,841	\$ 81,871.00	\$ 81,871.00
84	WLEX	10,889	13,440	81%	71,941	46,804	\$ 17,010.00	\$ 14,512.00
85	WRC	17,334	21,504	81%	70,925	68,277	\$ 49,522.00	\$ 49,013.00
86	WTVQ	11,652	13,440	87%	69,070	48,309	\$ 16,750.00	\$ 15,318.00
87	KWTV	7,378	13,440	55%	68,340	60,891	\$ 37,452.00	\$ 34,966.00
88	KXTX	15,623	16,128	97%	67,864	53,472	\$ 105,715.00	\$ 100,674.00
89	KIRO	14,777	16,128	92%	67,402	62,692	\$ 94,859.00	\$ 93,741.00
90	WHBQ	11,561	13,440	86%	66,356	59,861	\$ 43,688.00	\$ 41,135.00
91	KCBS	18,246	21,504	85%	66,155	63,221	\$ 53,662.00	\$ 53,068.00
92	WCWB	19,517	21,504	91%	66,115	53,708	\$ 163,483.00	\$ 159,657.00
93	WVTM	12,295	13,440	91%	65,321	61,189	\$ 36,511.00	\$ 36,224.00
94	KSTW	14,742	16,128	91%	65,084	58,034	\$ 121,121.00	\$ 118,297.00
95	KSL	11,157	13,440	83%	64,667	54,708	\$ 71,929.00	\$ 70,188.00
96	WAFB	11,415	13,440	85%	64,056	57,495	\$ 35,582.00	\$ 34,068.00
97	WTVF	9,994	13,440	74%	63,335	58,485	\$ 17,849.00	\$ 16,365.00
98	WTBS	10,711	21,504	50%	63,141	4,687	\$ 36,708.00	\$ 13,121.00
99	WYTV	11,993	13,440	89%	63,099	53,639	\$ 41,436.00	\$ 39,889.00
100	WDRB	11,648	13,440	87%	62,686	45,494	\$ 186,058.00	\$ 180,232.00
101	WTAJ	11,553	13,440	86%	62,663	55,905	\$ 48,832.00	\$ 44,760.00
102	WSMV	10,061	13,440	75%	62,332	59,684	\$ 23,949.00	\$ 23,848.00

Year 2003 Viewing Statistics
Source Views: nielsen.txt

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Row	Station Code	Quarter Hours with Zero Views	Possible Viewing Quarter Hours	Percent of Total Quarter Hours without a View	Total Distant Subscribers	F3 Distant Subscribers	Total Distant Fees	F3 Distant Fees
103	KFOR	6,970	13,440	52%	62,202	56,969	\$ 29,692.00	\$ 28,524.00
104	WCCO	18,200	21,504	85%	60,591	46,779	\$ 17,928.00	\$ 16,790.00
105	WALA	12,361	13,440	92%	60,581	58,957	\$ 145,409.00	\$ 145,341.00
106	WGME	13,328	13,440	99%	60,387	60,387	\$ 16,430.00	\$ 16,430.00
107	KTXL	13,232	13,440	98%	60,191	59,868	\$ 91,535.00	\$ 91,395.00
108	WBBM	19,784	21,504	92%	59,880	58,570	\$ 28,826.00	\$ 28,820.00
109	KTRK	14,448	16,128	90%	59,725	50,377	\$ 20,536.00	\$ 19,892.00
110	WPTY	12,948	13,440	96%	59,541	40,742	\$ 7,130.00	\$ 4,702.00
111	KTVT	12,977	16,128	80%	56,910	37,481	\$ 22,912.00	\$ 20,988.00
112	KUSI	13,275	13,440	99%	56,045	56,045	\$ 103,749.00	\$ 103,749.00
113	WAGA	17,811	21,504	83%	54,706	29,979	\$ 53,728.00	\$ 42,173.00
114	WVLA	11,175	13,440	83%	54,155	44,220	\$ 41,868.00	\$ 37,658.00
115	WMAR	21,040	21,504	98%	53,054	51,148	\$ 26,555.00	\$ 25,913.00
116	WNCT	11,015	13,440	82%	52,493	52,433	\$ 91,951.00	\$ 91,932.00
117	WGAL	11,738	13,440	87%	52,221	50,352	\$ 49,005.00	\$ 48,832.00
118	WNPA	17,719	21,504	82%	52,082	40,416	\$ 51,181.00	\$ 48,112.00
119	WFXT	17,328	21,504	81%	44,745	43,728	\$ 152,270.00	\$ 152,112.00
120	WPMT	12,348	13,440	92%	42,243	39,464	\$ 259,066.00	\$ 258,598.00
121	WBDC	20,461	21,504	95%	38,560	38,328	\$ 119,406.00	\$ 119,403.00
122	KBHK	21,165	21,504	98%	38,543	38,543	\$ 167,679.00	\$ 167,679.00
123	WNDS	21,334	21,504	99%	28,623	28,623	\$ 136,063.00	\$ 136,063.00
124	WAPK	12,927	13,440	96%	24,758	21,545	\$ 261,111.00	\$ 260,547.00
125	WBKI	12,634	13,440	94%	24,385	20,227	\$ 134,627.00	\$ 134,018.00
126	KTEL	12,206	13,440	91%	15,374	14,814	\$ 144,584.00	\$ 144,556.00

Before the
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In the Matter of)
)
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Distribution of 2000, 2001, 2002) Docket No. 2008-2 CRB CD 2000-2003
And 2003 Cable Royalty Funds) (Phase II)
)

REBUTTAL TESTIMONY OF TOM MOYER
INDEPENDENT PRODUCERS GROUP
REBUTTAL TO THE WRITTEN DIRECT STATEMENT
OF THE MPAA-REPRESENTED PROGRAM SUPPLIERS

May 15, 2013

**REBUTTAL TESTIMONY
OF TOM MOYER**

My name is Tom Moyer, and I am an independent motion picture and television producer. From 1998 until the present, I am the principal of Watercourse Road Productions LLC. Watercourse Road Productions was the producer of a children's television program entitled "Critter Gitters". I am appearing at the behest of Independent Producers Group, in connection with the 2000-2003 Phase II cable distribution proceedings.

Original production of "Critter Gitters" occurred from 1996 until 2002; however the program remains in syndication to this day. "Critter Gitters" was produced for six (6) seasons, and resulted in the production and distribution of 65 episodes. "Critter Gitters" was initially distributed by a third-party syndication company, but after one season Watercourse Road Productions assumed this function, and self-distributed the program. In the capacity of a successful producer/syndicator of U.S. television programming for thirteen (13) years, and continuing, I consider myself an expert on the subject.

Distribution of the program via syndication in U.S. broadcast television entails establishing relationships with the representatives of television stations in various television markets throughout the United States, specifically, the representatives of a television station or station group that are responsible for selecting the programming appearing thereon. It also entails obtaining sponsorship of the programming from advertisers, who place their advertising in that portion of the programming episode reserved for advertising. Watercourse Road Productions took on these responsibilities and operations when it began to self-syndicate its

programming.

Watercourse eventually obtained clearance in over 70% of the United States, meaning that such percentage of the population in the United States was capable of viewing “Critter Gitters” on one of the over-the-air broadcast stations carrying the program. Our programming appeared on such notable stations as superstation WGN Chicago, where two episodes of “Critter Gitters” were broadcast each week, sometimes back-to-back, and for three consecutive years. Watercourse would typically enter into a 52-week contract with a station or station group, pursuant to which the station or station group would retain two minutes of advertising time per episode, while Watercourse would retain three minutes of advertising time per episode.

In order to fund production and the other aspects of distribution, Watercourse was required to obtain advertising sponsors. Watercourse quickly obtained sponsorships with such notable companies as Legos, Kraft, Nabisco, Kellogg’s, Pfizer, and McDonalds, among others. Whether vying for station clearances or advertising sponsorship, our competitors were Disney, Fox, Nickelodeon, etc. All of these sponsors purchased advertising on the program, in advance of an episode’s production, and without any knowledge of whatever viewer ratings had been previously measured.

I have had an opportunity to review the written direct case of the MPAA-represented Program Suppliers, and specifically the testimony of Dr. Jeffrey Gray, and have been asked to express my expert opinion thereon. Dr. Gray makes certain significant statements with which I disagree. According to Dr. Gray,

“Audience size, which is determined through program viewership, is the primary goal of programmers and therefore the most direct measure of a program’s relative value.” Gray Amended Testimony at p.12.

“I calculate the relative viewership of MPAA programming and IPG programming. As described above, this is the most direct measure of relative value” Gray Amended Testimony at p.14.

As I have been informed, these proceedings are for the purpose of allocating cable royalties on a program-by-program basis, and the Copyright Royalty Board is charged with the responsibility of determining the most equitable means of making that allocation. As I have also been informed, the value of any given programming is based on the considerations of the cable system operators that select which broadcast stations they desire to retransmit, and who are ultimately seeking to increase subscribership to their cable system. Unfortunately, the leap of faith that is made in the testimony of Dr. Gray is that higher viewer ratings will necessarily equate to greater appeal to a cable system operator, and greater cable system subscribership.

As a producer and distributor of programming with extensive firsthand experience in such area, I can attest that viewer ratings do not even necessarily equate to securing *primary* transmissions by a broadcaster, much less *secondary* retransmissions by a cable system operator. To be certain, some programming is viewer driven. However, much programming is not, and it is a vast overstatement to suggest that viewer ratings are a necessary aspect of a program’s distribution, or even a consideration in many circumstances. The syndication of certain genres of programming, such as children’s programming, are particularly unconcerned with viewer ratings, and it is my speculation, though unconfirmed, that ratings are an even lesser consideration for independent stations than network-affiliated stations.

In the 13 years that I was a television producer and distributor, on not one occasion were

the ratings for our programming addressed. We did not obtain Nielsen viewership data for our programming, nor did our advertising sponsors. On not one occasion were viewership ratings a factor in securing a new advertising sponsor. In fact, on only one occasion was Watercourse Road Productions even queried by a prospective sponsor as to whether we had ratings data available. We did not have such information, told them so, and received their advertising sponsorship anyway. Repeatedly, Watercourse was informed that the motivating factor for a particular station or station group to broadcast our programming, or for an advertising sponsor to place advertising in our show, was the desire to be affiliated with quality programming. Without qualification, our sponsors would inform us that they were unconcerned about ratings because they wanted “to be aligned with great quality programming” and a strong station clearance.

In any event, the television world is packed with examples of programs that initially had miserable ratings, but remained in production because of their recognized quality. A preeminent example is the television show “Cheers”, which despite being ranked 74th out of 77 shows during its premiere, eventually ran for eleven seasons, garnering 28 Emmy Awards and 117 nominations. Some programs ultimately attain high ratings, and some do not. However, it is well-known that even network broadcasters will continue ordering episodes of a show despite mediocre ratings, because of the perception that the show may gain prominence for the producer via awards or recognition, or just to bring a variety of programming to the network.

To summarize, it is a vast error to suggest that television is about nothing but “viewer ratings”. Moreover, which “viewer ratings” would be considered relevant? Aggregate ratings? Ratings related only to viewers 18-34 in age? Ratings based on gender? Ratings based on ethnicity? Even the suggestion that a measured rating for one demographic is as valuable as the

same measured rating for a different demographic demonstrates the simplistic approach taken in Dr. Gray's testimony, or any approach that relies predominantly on viewer ratings to assess value.

Thank you for your time, and I hope that my testimony will be useful to your consideration.

Respectfully submitted,

By _____

Tom Moyer

May __, 2013

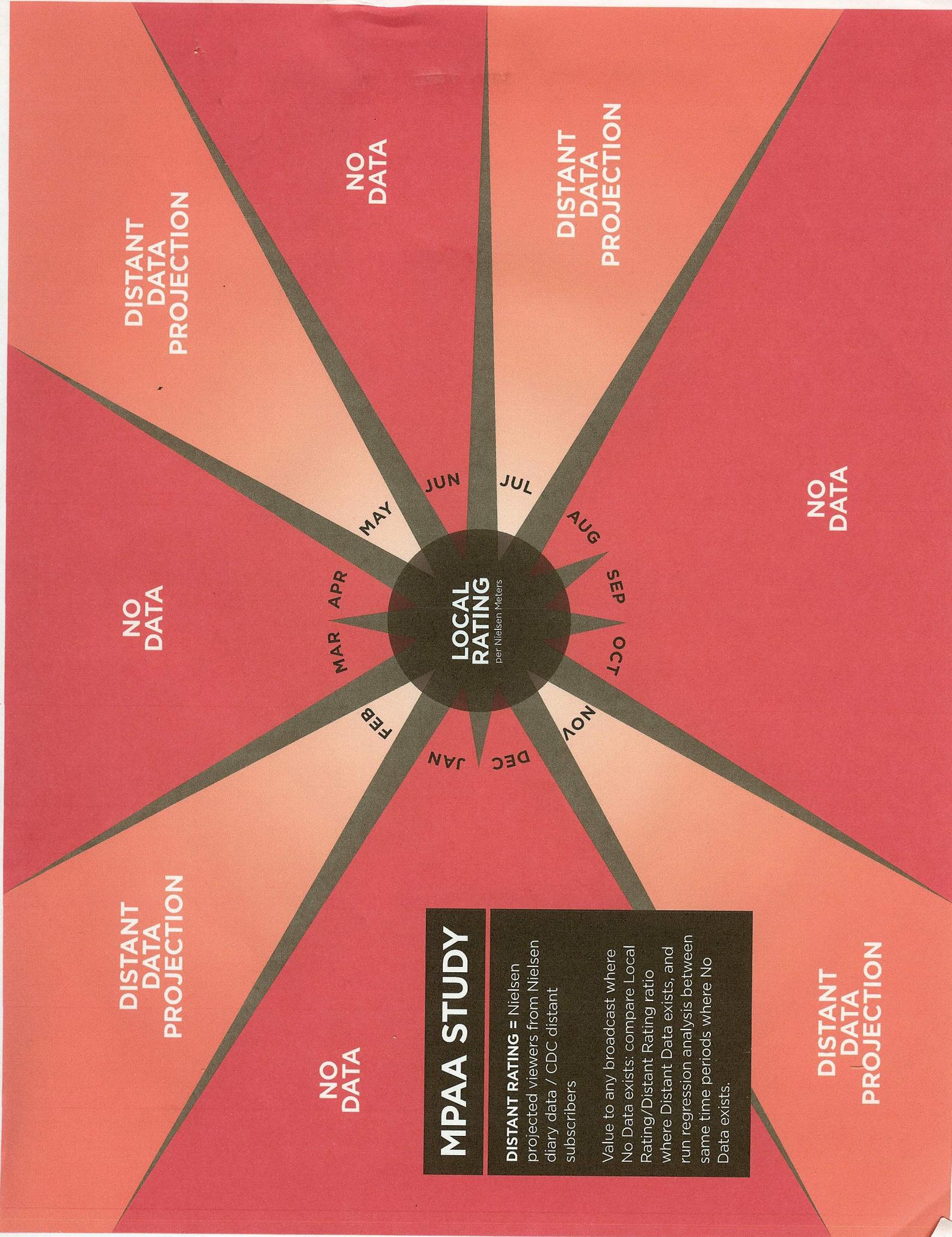
DECLARATION OF TOM MOYER

I declare under penalty of perjury that the foregoing testimony is true and correct, and of my personal knowledge.

Executed on May __, 2013

Raul C. Galaz

EXHIBIT 1



MPAA STUDY

DISTANT RATING = Nielsen projected viewers from Nielsen diary data / CDC distant subscribers

Value to any broadcast where No Data exists: compare Local Rating/Distant Rating ratio where Distant Data exists, and run regression analysis between same time periods where No Data exists.

DISTANT DATA PROJECTION

NO DATA

LOCAL RATING
per Nielsen Meters

MAR

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DEC

NOV

OCT

SEP

AUG

JUL

JUN

MAY

MAR

FEB

JAN

DEC

NOV

OCT

SEP

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EXHIBIT 2

ELECTRONIC FOLDERS AND FILES PRODUCED BY MPAA

June 18, 2012:

KESSLER, MARTIN, GRAY

2000

Copy of distant stations - working copy.xls

2001

Copy of DIARY SAMPLE - 2001 CABLE.xls

Copy of MKFXSM01_DISTANTSTATIONS_2001 - working copy.xls

2002

Copy of Diary Sample – 2002.xls

Copy of 2002_DistantStations_ALL FORMS_040322 from CDC – working.xls

2003

Copy of 2003 Diary Sample.xls

Copy of 2003 distant comm'l stations for diary study.xls

LINDSTROM, GRAY

NIELSEN DIARY DATA

Nielsen File Format.txt

niel00.txt

niel01.txt

niel02_reg_sta.txt

niel02_sup_sta.txt

niel03.txt

NIELSEN LOCAL RATINGS DATA

Local Ratings 2000.zip

Local Ratings 2001.zip

Local Ratings 2002.zip

Local Ratings 2003.zip

[each zip file contains multiple .txt files with local ratings data, on market-by-market basis, e.g., "Dallas 2000.txt"]

PATTERSON, GRAY

DIARY STATIONS

Tribune_Masha.txt

2000 Detail of Diary Matches.xlsx

2001 Detail of Diary Matches.xlsx

2002 Detail of Diary Matches.xlsx

2003 Detail of Diary Matches.xlsx

LOCAL RATINGS STATIONS

2000 Detail of Local Matches.txt

2001 Detail of Local Matches.txt

2002 Detail of Local Matches.txt

2003 Detail of Local Matches.txt

Tribune_Gray.txt

July 10, 2012:

Detail_of_Local_Matches_Field_Definitions.xlsx

Tribune_Field_Definitions.xlsx

IPG Exhibit R-2

Tribune_Marsha v2.txt
Tribune_Gray v2.txt

August 21, 2012:

00-03 Detail of IPG Matches.xlsx
log_statistics.log
MPAA-RP-05868 - MPAA-RP-05869.pdf
MPAA-RP-05837 - MPAA-RP-05867.pdf

IPG Exhibit R-2

EXHIBIT 3



Gregory O. Olaniran
A Professional Corporation
(202) 355-7917 Phone
(202) 355-7887 Fax
goo@msk.com

June 14, 2012

VIA E-MAIL AND FEDERAL EXPRESS

Brian D. Boydston
Pick & Boydston LLP
10786 Le Conte Avenue
Los Angeles, CA 90024

Re: MPAA-Represented Program Suppliers' Responses To IPG's Initial Requests for Underlying Documents, Docket No. 2008-2 CRB CD 2000-2003 (Phase II)

Dear Brian:

This letter constitutes MPAA-Represented Program Suppliers' Responses to the initial discovery requests submitted by Independent Producers Group ("IPG") on June 6, 2012, in connection with the referenced matter.

We repeat each of your written requests below, followed by our Response. To the extent we agree to provide underlying documents, we will produce non-privileged documents only. If we are unable to reproduce a requested document, we will make such documents available for your inspection and copying, at your expense, at our office on June 18, 2012. To the extent a responsive document is available in electronic form, we will make an electronic copy of the document available to you on June 18, 2012.

I. General Objections:

- A. MPAA-represented Program Suppliers object to these requests to the extent that they are vague, ambiguous, or otherwise not susceptible to a response, and to the extent that they are overly broad, unduly burdensome, and seek the disclosure of documents and information not reasonably calculated to lead to the discovery of evidence admissible in this proceeding.
- B. MPAA-represented Program Suppliers object to these requests to the extent that they seek disclosure of documents and information that are not subject to discovery pursuant to the rules and procedures of the Copyright Royalty Judges. Without limiting the generality of the foregoing, MPAA-represented Program Suppliers object to each request insofar as it seeks production documents other than those required to be produced under Section 351.6 of the rules of the

Copyright Royalty Judges, which require production only of “nonprivileged underlying documents related to written exhibits and testimony.”

- C. MPAA-represented Program Suppliers object to these requests to the extent that the definitions and instructions purport to impose obligations beyond those imposed by the rules and procedures of the Copyright Royalty Judges.
- D. MPAA-represented Program Suppliers object to these requests to the extent that they seek the disclosure of information and documents protected from disclosure by any privilege, including, without limitation, the attorney-client privilege and the work product doctrine.
- E. MPAA-represented Program Suppliers object to these requests to the extent they call for a witness to create documents or perform analyses, or to produce a document not within the witnesses’ possession, custody, or control.
- F. MPAA-represented Program Suppliers object to these requests to the extent that they seek production of documents to which all parties have equal access, including but not limited to publicly available documents.
- G. MPAA-represented Program Suppliers object to these requests to the extent that they call for a witness to disclose confidential, proprietary, or “trade secret” information, and production is requested in the absence of a protective order limiting the disclosure of such restricted information.
- H. MPAA-represented Program Suppliers object to these requests to the extent that they call for production of documents, data, or related information that is already within the IPG’s possession, custody, or control, including, but not limited to, requests related to documents or data that were previously produced to IPG by MPAA-Represented Program Suppliers in previous proceedings.
- I. These General Objections are incorporated into each of the following Responses.

II. Responses Pertaining to Specific Requests:

WRITTEN DIRECT STATEMENT

Any and all documents underlying or used to support the following statements:

- 1) “The Phase I portion of the distribution of the 2000, 2001, 2002, and 2003 cable royalties . . . was resolved . . . by confidential settlement among certain Phase I Parties . . .”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request because it is directed at MPAA-represented Program Suppliers’ introduction

memorandum. This request does not seek “nonprivileged underlying documents” related to any particular witness’ “written exhibits and testimony.” Accordingly, the request is improper under the Judges’ regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this request to the extent that it seeks information not reasonably calculated to lead to the discovery of evidence admissible in this proceeding, as well as confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objections A and G.

- 2) “Accordingly, MPAA engaged [Independent Producers Group] in settlement discussions.”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request because it is directed at MPAA-represented Program Suppliers’ introduction memorandum. This request does not seek “nonprivileged underlying documents” related to any particular witness’ “written exhibits and testimony.” Accordingly, the request is improper under the Judges’ regulations. *See* General Objection B.

- 3) “Dr. Gray employs the Nielsen Studies, multiple other data sources, and regression analysis, to calculate the level of distant viewing to MPAA claimed works on a representative random sample of distant signals for each royalty year at issue in this proceeding.”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request because it is directed at MPAA-represented Program Suppliers’ introduction memorandum. This request does not seek “nonprivileged underlying documents” related to any particular witness’ “written exhibits and testimony.” Accordingly, the request is improper under the Judges’ regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objections A and G.

- 4) “Dr. Gray also provides an economic analysis and a regression model for calculating the relative market value of MPAA- and IPG-claimed works for each of the 2000-2003 cable royalty years based on multiple factors, including volume, viewership, and distant subscribers.”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request because it is directed at MPAA-represented Program Suppliers’ introduction memorandum. This request does not seek “nonprivileged underlying documents” related to any particular witness’ “written exhibits and testimony.” Accordingly, the request is improper under the Judges’ regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objections A and G.

- 5) "MPAA-represented Program Suppliers have no valid basis for according IPG a share of the 2000-2003 Cable Royalties."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request because it is directed at MPAA-represented Program Suppliers' introduction memorandum. This request does not seek "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony." Accordingly, the request is improper under the Judges' regulations. *See* General Objection B.

DIRECT TESTIMONY OF MARSHA E. KESSLER

Any and all documents underlying or used to support the following statements:

- 6) "I have previously testified before the Copyright Royalty Judges . . . in Phase I of this proceeding . . .", including but not limited to transcripts of such testimony.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available as a part of the record in Docket No. 2008-2 CRB CD 2000-2003. *See* General Objection F. Notwithstanding this objection, MPAA-represented Program Suppliers will produce a copy of all exhibits referenced in Ms. Kessler's written direct testimony in the 2000-2003 Cable Phase I Proceeding. A copy of Ms. Kessler's Phase I written testimony is Appendix A to Ms. Kessler's testimony in this Phase II proceeding.

- 7) "I also provided testimony to the Judges in the recent 2004-2005 cable Phase I proceeding", including but not limited to transcripts of such testimony.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available as a part of the record in Docket No. 2007-3 CRB CD 2004-2005. *See* General Objection F.

- 8) "I have testified numerous times before the . . . Canadian Copyright Board on matters related to statutory license royalties", including but not limited to transcripts of such testimony.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available, and to which all parties have equal access. *See* General Objection F. MPAA-represented Program Suppliers further object to this request in that it seeks documents not within the witness' possession, custody, or control. *See* General Objection E.

- 9) "In Phase II proceedings, MPAA represents those program suppliers who have agreed to representation by MPAA . . ."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks information not reasonably calculated to lead to the discovery of evidence admissible in this proceeding, as well as confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objections A and G. Notwithstanding these objections, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 10) "MPAA directly and indirectly represents as many as 1,400 claimants per royalty year."

RESPONSE: Objection. The documents responsive to this request are the claims that the MPAA-represented claimants identified on Appendix B to Ms. Kessler's testimony filed with the Copyright Office for each of the 2000-2003 cable royalty years. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available, and to which all parties have equal access. *See* General Objection F. Notwithstanding this objection, responsive documents will be produced.

- 11) "An alphabetical list . . . of all of the program titles that MPAA-represented Program Suppliers are claiming in this proceeding for each royalty year is attached to my testimony . . ."

RESPONSE: Objection. The alphabetical list referenced in the quoted statement is Appendix C to Ms. Kessler's testimony, and IPG was already provided with a copy of Appendix C as a part of MPAA-represented Program Suppliers' Written Direct Statement. *See* General Objection H. Notwithstanding the objection, documents responsive to this request will be produced.

- 12) "Taken together, this list includes approximately 11,600 MPAA-claimed titles . . ."

RESPONSE: Objection. The 11,600 figure quoted is simply the sum of all the titles listed on pages 1-112 of Appendix C to Ms. Kessler's Testimony. IPG already has a copy of MPAA-represented Program Suppliers' Written Direct Statement. *See* General Objection H.

- 13) "In the years that I worked at MPAA, we developed and maintained internal standards to ensure that only those individuals or entities who were truly entitled to claim retransmission royalties would be able to assert a claim for those royalties through MPAA."

RESPONSE: Documents responsive to this request will be produced. Ms. Kessler also relied on her industry knowledge and experience in making the statement.

- 14) "To be a MPAA-represented claimant, a rights-holder must satisfy the following

requirements: (1) file a timely claim for retransmission royalties each year with the Copyright Office . . .”

RESPONSE: Objection. The documents responsive to this request are the claims that the MPAA-represented claimants identified on Appendix B to Ms. Kessler’s testimony filed with the Copyright Office for each of the 2000-2003 cable royalty years. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available, and to which all parties have equal access. *See* General Objection F. Notwithstanding this objection, responsive documents will be produced.

- 15) “To be a MPAA-represented claimant, a rights-holder must satisfy the following requirements: . . . (2) provide MPAA with an “as-filed” copy of that claim, demonstrating that it was submitted to the Office in a timely manner . . .”

RESPONSE: Objection. The documents responsive to this request are the claims that the MPAA-represented claimants identified on Appendix B to Ms. Kessler’s testimony filed with the Copyright Office for each of the 2000-2003 cable royalty years. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available, and to which all parties have equal access. *See* General Objection F. Notwithstanding this objection, responsive documents will be produced.

- 16) “To be a MPAA-represented claimant, a rights-holder must satisfy the following requirements: . . . (3) have a valid representation agreement with MPAA.”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks information not reasonably calculated to lead to the discovery of evidence admissible in this proceeding, as well as confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objections A and G. Notwithstanding these objections, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 17) “All of the MPAA-represented claimants listed on Appendix B to my testimony satisfied these requirements.”

RESPONSE: Objection. IPG was already provided with a copy of Appendix B to Ms. Kessler’s testimony as a part of MPAA-represented Program Suppliers’ Written Direct Statement. *See* General Objections A and H. Ms. Kessler also relied on her industry knowledge and experience in making the statement.

- 18) “MPAA proceeded to identify the program titles for which those entities were entitled to claim Section 111 royalties.”

RESPONSE: Documents responsive to this request will be produced.

- 19) "This process included analyzing the program title information submitted by MPAA-represented claimants . . ."

RESPONSE: Documents responsive to this request will be produced.

- 20) ". . . and performing independent research to identify additional program titles potentially owned by our represented claimants."

RESPONSE: There are no documents responsive to this request. Ms. Kessler relied on her industry knowledge and experience in making the statement.

- 21) "[MPAA] prepared a certification report listing those titles and sent it to the claimant, along with a certification form for the claimant to sign verifying that party's right to claim the works listed on the certification report."

RESPONSE: Documents responsive to this request will be produced.

- 22) "MPAA's represented claimants returned their executed certifications to my attention at MPAA."

RESPONSE: Documents responsive to this request will be produced.

- 23) "I reviewed the executed certifications and ensured that any corrections made to the report were accurately adjusted by MPAA."

RESPONSE: Documents responsive to this request will be produced.

- 24) "The list of MPAA-represented claimants' titles in Appendix C of my testimony were all subject to this certification process."

RESPONSE: Documents responsive to this request will be produced.

- 25) "Viewing, as measured by Nielsen, is the predominant standard by which all television programming is commercially evaluated."

RESPONSE: There are no documents responsive to this request. Ms. Kessler relied on her industry knowledge and experience in making the statement.

- 26) "I requested a report from Cable Data Corporation . . . showing all stations distantly retransmitted by cable systems for each of the years in question."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a

protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

27) "I identified and prepared a list of sample stations for each year."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

28) "MPAA based identification of the counties local to each 2000-2003 sample station on the FCC signal carriage rules . . ."

RESPONSE: Objection. IPG was already provided with a copy of the FCC signal carriage rules in Appendix E to Ms. Kessler's testimony. *See* General Objection H. Notwithstanding the objection, responsive documents will be produced.

29) "First, we identified the counties that constituted each station's Designated Market Area ("DMA")."

RESPONSE: Documents responsive to this request will be produced and/or made available for inspection.

30) "Second, we identified the counties in which each station was deemed "significantly viewed" ("SV") per the FCC."

RESPONSE: Objection. The FCC's SV designation is available on the agency's website. *See* Kessler Testimony, Appendix F, p.2. IPG was already provided with this information as a part of MPAA-represented Program Suppliers' Written Direct Statement. *See* General Objection H. Notwithstanding the objection, responsive documents will be produced.

31) "Lastly, we looked at other factors that would qualify a county as local to the station in question."

RESPONSE: Documents responsive to this request will be produced.

32) ". . . we then provided Nielsen with a listing of those counties that we identified as local for each sample station."

RESPONSE: Documents responsive to this request will be produced.

- 33) "Nielsen excluded viewing from cable households located in each station's local counties with the result that only *distant* cable viewing is shown in the studies."

RESPONSE: There are no documents responsive to this request. Ms. Kessler relied on her industry knowledge and experience in making the statement.

- 34) "I delivered these items to Nielsen and requested special studies for each of the 2000-2003 years estimating distant viewing to the selected stations by cable households."

RESPONSE: Documents responsive to this request will be produced.

Any documents underlying or used to support the creation of:

- 35) Kessler Appendix A, including but not limited to any exhibits or attachments thereto.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available as a part of the record in Docket No. 2008-2 CRB CD 2000-2003. *See* General Objection F. Notwithstanding this objection, MPAA-represented Program Suppliers will produce a copy of all exhibits referenced in Ms. Kessler's written direct testimony in the 2000-2003 Cable Phase I Proceeding. A copy of Ms. Kessler's Phase I written testimony is Appendix A to Ms. Kessler's testimony in this Phase II proceeding.

- 36) Kessler Appendix B.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 37) Kessler Appendix C.

RESPONSE: Documents responsive to this request will be produced.

- 38) Kessler Appendix D.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

39) Kessler Appendix F.

RESPONSE: Objection. All of the documents that Ms. Kessler relied on in preparing Appendix F are either documents that are publicly available and cited in Appendix F, or are attached to Appendix F as Attachments 1-4. IPG either has equal access to, or already has copies of, all relevant documents. *See* General Objections F and H. Ms. Kessler also relied on her industry knowledge and experience in preparing Appendix F.

DIRECT TESTIMONY OF JONDA K. MARTIN

Any and all documents underlying or used to support the following statements:

- 40) “. . . CDC provided MPAA with customized data reports for each of [the 2000-2003] royalty years.”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 41) “I understand that Ms. Kessler utilized these data in order to select a sample of stations for the Nielsen Studies, and that Dr. Jeffrey Gray also utilized the same CDC data in his economic analysis.”

RESPONSE: There are no responsive documents underlying this statement. Ms. Martin acquired the understanding referenced in the statement via oral conversations.

DIRECT TESTIMONY OF KELVIN R. PATTERSON

Any and all documents underlying or used to support the following statements:

- 42) “First, Reznick examined broadcast television station logs provided by Tribune Media Services (“Tribune”) for the sample stations selected for 2000, 2001, 2002, and 2003 by Marsha Kessler and those selected by Dr. Jeffrey Gray.”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding. Also responsive to this request are Appendix C to Ms. Kessler’s testimony and Appendix B,

Table B-2 to Dr. Gray's testimony, which are already in IPG's possession. *See* General Objection H.

- 43) "Reznick was directed by MPAA to identify and exclude program titles that according to MPAA are not compensable for purposes of this proceeding . . ."

RESPONSE: There are no responsive documents underlying this statement. Mr. Patterson acquired the directions referenced in the statement via oral conversations.

- 44) "Specifically, Reznick excluded (1) programs identified in the Tribune data as broadcast type ABC, CBS, and NBC (i.e., network programming), (2) programs airing on WGN's local feed ("WGN-local") that were not simultaneously broadcast on WGN's national feed ("WGN-A"), and (3) programs not identified by Tribune as a series, special, movie, documentary, or "other.""

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 45) "Reznick received from MPAA a list of program titles claimed by MPAA-represented claimants . . ."

RESPONSE: Objection. MPAA-represented Program Suppliers already provided IPG with a copy of the referenced list of program titles as Appendix C to Ms. Kessler's testimony. *See* General Objection H.

- 46) "Reznick then compared the MPAA Titles with the refined Tribune data to identify every distant retransmission of each MPAA Title ("MPAA Title Retransmissions") on the Diary Sample Stations and the Local Ratings Sample Stations."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 47) "The resulting information was provided to MPAA's witness, Dr. Jeffrey Gray."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced

following entry of an appropriate protective order in this Phase II proceeding.

DIRECT TESTIMONY OF PAUL B. LINDSTROM

Any and all documents underlying or used to support the following statements:

48) "MPAA supplied Nielsen with the list of the Kessler Stations . . ."

RESPONSE: Objection. The document responsive to this request is Appendix D to Ms. Kessler's testimony, which is already in IPG's possession. *See* General Objection H.

49) "I understand that MPAA . . . selected the Kessler Stations based on the number of distant subscribers and the amount of Sections 111 royalty fees generated by each station."

RESPONSE: There are no responsive documents underlying this statement. Mr. Lindstrom acquired the understanding referenced in the statement via oral conversations. Mr. Lindstrom also relied on his industry knowledge and experience in making the statement.

50) "MPAA provided Nielsen with the information as to whether counties were distant or local for each of the Kessler Stations."

RESPONSE: Documents responsive to this request will be produced.

51) "Nielsen eliminated all non-cable viewing of programs for the Kessler Stations and all viewing to each station that occurred within the station's local area."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

52) "This is reported in the form of minutes of viewing by households."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

53) "Where the viewing minutes to particular distant signal programs were so small as to be

statistically insignificant, Nielsen's custom analysis would assign a zero viewing value."

RESPONSE: There are no responsive documents underlying this statement. Mr. Lindstrom relied on his industry knowledge and experience in making the statement.

DIRECT TESTIMONY OF JEFFREY S. GRAY

Any and all documents underlying or used to support the following statements:

- 54) "Program viewership provides a direct and reasonable measure of program market value ..."

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

- 55) "... it is possible to calculate viewing minutes for programs shown during sweeps as well as non-sweeps months."

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

- 56) "Regression analysis also enables the calculation of viewing minutes on retransmitted signals with relatively few distant subscribers."

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

- 57) "I have not received information concerning any valid, compensable programs claimed by Independent Producers Group ("IPG" within the Program Suppliers category for this Phase II proceeding."

RESPONSE: There are no responsive documents underlying this statement.

- 58) "Relative market value corresponds to the price at which the right to retransmit a program carried on a distant broadcast signal would change hands between a willing buyer (a CSO) and a willing seller (a copyright owner), neither being under any compulsion to buy or to sell."

RESPONSE: Objection. The documents responsive to this request are publicly available documents cited in footnotes 9 and 10 of Dr. Gray's testimony. MPAA-represented Program Suppliers object to this request in that it seeks documents that are publicly available, and to which all parties have equal access. *See* General Objection F. In addition to the documents cited in footnotes 9 and 10 in his testimony, Dr. Gray relied

on his professional knowledge and experience in making the statement.

- 59) "From the CSO's perspective, the more a program attracts subscribers to watch and keep coming back to watch, the more valuable the program is to the CSO's net-revenue maximizing goal of retaining and growing subscriber count."

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

- 60) "I hope to be able to measure statistically whether MPAA-represented or IPG-represented programs affect subscriber growth differently . . ."

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

- 61) "I rely upon Nielsen viewing data to study the volume and viewing information of compensable programs from 2000 through 2003."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 62) "I rely on two types of Nielsen data: (1) Nielsen Diary data and (2) Nielsen Local Ratings data."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

- 63) ". . . Nielsen calculated the amount of distant viewing to each station for each quarter-hour throughout the sweeps months."

RESPONSE: Objection. The document responsive to this request is the Written Direct Testimony of Paul Lindstrom, which was previously provided to IPG in MPAA-represented Program Suppliers' Written Direct Statement. *See* General Objection H.

- 64) ". . . I merged program title information for MPAA-represented programs prepared from Tribune Media Services ("Tribune") data."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to

the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

65) “The data was provided to me by the Reznick Group . . .” [fn. 20]

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

66) “These zero viewing observations result, at least in part, from the small number of diaries issued and collected by Nielsen.”

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

67) “I utilize more information . . . to calculate the levels of distant viewing during non-sweeps months . . . as well as during sweeps months . . .”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

68) “I . . . implement statistically valid regression analyses to calculate the levels of distant viewing during non-sweeps months . . . as well as during sweeps months . . .”

RESPONSE: Documents responsive to this request will be provided. Dr. Gray also relied on his professional knowledge and experience in making the statement.

69) “I augment the Nielsen Diary data with Nielsen Local Ratings data and Cable Data Corporation (“CDC”) distant subscriber data.”

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents containing restricted information will be produced following entry of an appropriate protective order in this Phase II proceeding.

70) "There were over 900 stations that were retransmitted on distant signals annually from 2000-2003."

RESPONSE: Documents responsive to this request will be produced.

71) "I implemented a random sampling methodology to identify a sample of 120 distantly retransmitted stations each year from 2000 to 2003."

RESPONSE: Documents responsive to this request will be produced.

72) "For each of these stations and years, I obtained the Nielsen Local Ratings data . . ."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

73) "I then merged the Local Ratings data with the Tribune data, including programming information, to create a combined dataset . . ."

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

74) "The Nielsen Diary data does not include information on distant ratings . . ."

RESPONSE: There are no responsive documents underlying this statement.

75) "I can therefore calculate a distant ratings measure . . ."

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

76) "I am able to analyze the various datasets described above and provide statistics concerning the breadth of MPAA programming and the extent to which it is retransmitted in distant markets."

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

77) "Annual viewership of MPAA compensable programming will be a multiple of its

programming volume.”

RESPONSE: There are no responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making the statement.

Any documents underlying or used to support the creation of:

78) Table 1.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

79) Table 2.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

80) Table 3.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this request to the extent that it seeks confidential and/or proprietary information in the absence of a protective order limiting the disclosure of such restricted information. *See* General Objection G. Notwithstanding this objection, responsive documents will be produced following entry of an appropriate protective order in this Phase II proceeding.

81) Appendix B, Table B-1.

RESPONSE: Documents responsive to this request will be produced.

82) Appendix B, Table B-2.

RESPONSE: Documents responsive to this request will be produced.

Additional Requests for Jeffrey S. Gray

83) Documents underlying any and all references cited within Dr. Gray's testimony, including but not limited to references within the footnotes.

RESPONSE: Objection. With the exception of the reference book cited in footnote 13 of Dr. Gray's testimony, the documents responsive to this request are either publicly available documents, or testimonies contained in MPAA-represented Program Suppliers' Written Direct Statement in this Phase II proceeding. MPAA-represented Program Suppliers object to this request in that it seeks documents that IPG already has in its possession, documents that are publicly available, or documents to which all parties have equal access. *See* General Objections F and H. Notwithstanding the objection, MPAA-represented Program Suppliers will make the reference book cited in footnote 13 of Dr. Gray's testimony available for inspection.

GENERAL REQUESTS

- 84) Any documents reflecting the MPAA's prior distribution of 2000-2003 cable distribution royalties to MPAA-represented claimants.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this "General Request" because it is not directed at "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony," and thus is improper under the Judges' regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this request as irrelevant and not calculated to lead to the discovery of evidence admissible in this proceeding, and that it seeks confidential and/or proprietary information unrelated to this proceeding. *See* General Objections A and G.

- 85) Any documents reflecting the MPAA's prior assessment of relative value of programming in the Program Suppliers category for 2000-2003 cable distribution royalties.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this "General Request" because it is not directed at "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony," and thus is improper under the Judges' regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this request as irrelevant and not calculated to lead to the discovery of evidence admissible in this proceeding, and that it seeks confidential and/or proprietary information unrelated to this proceeding. *See* General Objections A and G.

- 86) Any documents reflecting which MPAA-represented claimants are making claim to which MPAA-claimed programs.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this "General Request" because it is not directed at "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony," and thus is improper under the Judges' regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this to the extent that it seeks confidential and/or proprietary information. *See* General Objections A and G.

- 87) Any documents reflecting the copyright ownership to MPAA-claimed programming that was retransmitted by cable systems during 2000-2003.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this "General Request" because it is not directed at "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony," and thus is improper under the Judges' regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this to the extent that it seeks confidential and/or proprietary information. *See* General Objections A and G.

- 88) Any documents providing a basis for determining the relative value of MPAA-claimed programming as compared to any other programming within the Program Suppliers category.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this "General Request" because it is not directed at "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony," and thus is improper under the Judges' regulations. *See* General Objection B. MPAA-represented Program Suppliers further object that the request is vague, ambiguous, and overly broad, as it fails to even specify the time period or royalty year(s) for which documents are requested. *See* General Objection A.

- 89) Any documents reflecting the allocation, whether by settlement agreement or award, of cable retransmission royalties to the Program Suppliers category for calendar years 2000-2003.

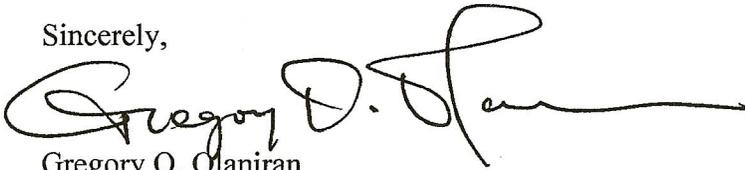
RESPONSE: Objection. MPAA-represented Program Suppliers object to this "General Request" because it is not directed at "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony," and thus is improper under the Judges' regulations. *See* General Objection B. MPAA-represented Program Suppliers also object to this request as irrelevant and not calculated to lead to the discovery of evidence admissible in this proceeding, and that it seeks confidential and/or proprietary information. *See* General Objections A and G.

- 90) Any documents reflecting the numbers or percentages of "zero viewing" instances appearing in the Nielsen custom analysis performed for the MPAA, whether inclusive of only programming compensable in this proceeding, or programming non-compensable in this proceeding.

RESPONSE: Objection. MPAA-represented Program Suppliers object to this "General Request" because it is not directed at "nonprivileged underlying documents" related to any particular witness' "written exhibits and testimony," and thus is improper under the Judges' regulations. *See* General Objection B. MPAA-represented Program Suppliers

also object to this request as irrelevant and not calculated to lead to the discovery of evidence admissible in this proceeding, and that it seeks confidential and/or proprietary information. *See* General Objections A and G. MPAA-represented Program Suppliers further object to this request to the extent that it calls for a witness to create documents or perform analyses. *See* General Objection E.

Sincerely,



Gregory O. Olaniran
A Professional Corporation of
MITCHELL SILBERBERG & KNUPP LLP

GOO/pxt

EXHIBIT 4

Flowchart of MPAA witness testimony, and MPAA-produced electronic files

Step	Witness	Step in process of MPAA viewer study	Diary Data files	Notes	Local Ratings Data files	Notes
1	Patterson	"Reznick examined broadcast television logs provided by Tribune Media Services ("Tribune") for the sample stations selected for 2000, 2001, 2002, and 2003 by Marsha Kessler and those selected by Dr. Jeffrey Gray"	Tribune_Marsha v.2		Tribune_Gray v.2	
2	Patterson	"Reznick was directed by MPAA to identify and exclude program titles that according to MPAA are not compensable for purposes of this proceeding, including program titles that do not fall in the Program Suppliers category. Specifically, Reznick excluded (1) programs identified in the Tribune data as broadcast typ ABC, CBS, and NBC (i.e., network programming), (2) programs airing on WGN's local feed ("WGN-local") that were not simultaneously broadcast on WGN's national feed (WGN-A"), and (3) programs not identified by Tribune as a series, special, movie, documentary, or "other"."	Not produced		Not produced	
3	Patterson	"Second, for each year in question, Reznick received from MPAA a list of program titles claimed by MPAA-represented claimants that according to MPAA was prepared under the direction of Ms. Kessler, and a copy of which is attached to her written direct testimony in this proceeding as Appendix C ("MPAA Titles")."	Not produced		Not produced	
4	Patterson	"Reznick then compared the MPAA Titles with the refined Tribune data to identify every distant retransmission of each MPAA Title ("MPAA Title Retransmissions") on the Diary Sample Stations and the Local Ratings Sample Stations. The resulting information was provided to MPAA's witness, Dr. Jeffrey Gray."	2000 Detail of Diary Matches.xlsx, 2001 Detail of Diary Matches.xlsx, 2002 Detail of Diary Matches.xlsx, 2003 Detail of Diary Matches.xlsx	Files still contains network broadcasts, though ostensibly removed in earlier process.	2000 Detail of Local Matches.txt, 2001 Detail of Local Matches.txt, 2002 Detail of Local Matches.txt, 2003 Detail of Local Matches.txt	File still contains network broadcasts, though ostensibly removed in earlier process.

Flowchart of MPAA witness testimony, and MPAA-produced electronic files

5	Gray	"I rely on two types of Nielsen data: (1) Nielsen Diary data and (2) Nielsen Local Ratings data."	niel00, niel01, niel02_sup_sta.txt, niel02_reg_sta.txt, niel03, Nielsen File Format.txt	Nielsen File Format reflects 13 categories of information should exist, but only 8 appear in the produced files, reflecting omission of Quarter Hour, Market Code, Day of Week, Week, and other categories of information, all of which has been deleted from files.	Local Ratings 2000.zip, Local Ratings 2001.zip, Local Ratings 2002.zip, Local Ratings 2003.zip,	
6	Gray	"I . . . Implement statistically valid regression analyses to calculate the levels of distant viewing during non-sweeps months . . . as well as during sweeps months . . ."	Not produced			
7	Gray	"I implemented a random sampling methodology to identify a sample of approximately 120 distantly retransmitted stations each year from 2000 to 2003"				
8	Gray	"For each time slot in the Nielsen diary data I merged program title information for MPAA-represented programs prepared from Tribune Media Services ("Tribune") data."	Not produced	This purports to merge the files produced in Step 4 with Nielsen Diary data files referenced in Step 5.		

Flowchart of MPAA witness testimony, and MPAA-produced electronic files

9	Gray	<p>"For each of these stations and years, I obtained the Nielsen Local Ratings data I then merged the Local Ratings data with the Tribune data."</p>			<p>Not produced</p>	<p>This purports to merge the files produced in Step 4 with Local Ratings data files referenced in Step 5.</p>
10	Gray	<p>"I can therefore calculate a distant ratings measure as the number of distant viewers of the stations for each fifteen-minute time interval (from the Diary data) divided by the total number of distant subscribers of that station (from the CDC data)."</p>	<p>Not produced</p>	<p>MPAA response to IPG RFP #75 is "there are not responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making this statement." NOTE: purpose of this calculation is to create a Distant Rating on a time period-by-time period basis.</p>		

Flowchart of MPAA witness testimony, and MPAA-produced electronic files

11	Gray	"I am able to analyze the various datasets described above and provide statistics concerning the breadth of the MPAA programming and the extent to which it is retransmitted in distant markets."	Not produced	MPAA response to IPG RFP #76 is "there are not responsive documents underlying this statement. Dr. Gray relied on his professional knowledge and experience in making this statement." NOTE: statement incorporated reference to a comparison being made between Local Ratings and Distant Ratings, then applying such information to the non-sweeps period broadcasts in order to create the integrated database.		
		IPG requested "Any documents reflecting the MPAA's prior assessment of relative value of programming in the Program Suppliers category for 2000-2003 cable distribution royalties." No documents produced by MPAA.	Not produced	MPAA response to IPG RFP #85 is "Objection", the request is not directed at documents related to a particular witness' testimony or exhibits, irrelevant, and not calculated to lead to the discovery of admissible evidence.		

Flowchart of MPAA witness testimony, and MPAA-produced electronic files

	<p>Electronic files subsequently produced by MPAA as documents relied upon for Amended Written Direct Statement</p>				
	<p>Document titled "Data Analysis"</p>	<p>MPAA-RP-05868 - MPAA-RP-05869.pdf</p>	<p>Document reflects a description of the processes followed to create integrated database. Note that the order of processes is different than in the testimony - network feed programming assertedly dropped at step 5, not earlier as per written testimony. More significantly, no representative electronic files are indicated as reflecting the final step (actually, several steps are included), whereby the final integrated database is produced.</p>		
	<p>IPG Exh. 2 from IPG written direct case.</p>	<p>MPAA-RP-05837 - MPAA-RP-05867.pdf</p>	<p>File is a hard copy of IPG exhibit listing IPG titles. Electronic version not produced even though IPG produced this list to MPAA in an electronic version.</p>		
	<p>Electronic file of IPG titles with matching broadcasts in unidentified MPAA electronic files.</p>	<p>00-03 Detail of IPG Matches.xlsx</p>	<p>File identifies 291,648 separate broadcasts, but it is not clear whether these are "Local" matches or "Diary" matches. Compare this with 4,311,135 separate broadcasts appearing in MPAA Detail of Local Matches and 2,444,571 separate broadcasts appearing in MPAA Detail of Diary Matches; i.e., 6.76% and 11.93% of MPAA matches, respectively.]</p>		

EXHIBIT 5

	Cable System programming		
	Cartoon Network rating	Retransmitted Station rating	Aggregate Rating
Option 1: Station KAAA			
(contains children's programming)	10	10	20
Option 2: Station WBBB			
(contains talkshows for adults)	20	4	24

EXHIBIT 6

YEAR	ZERO VIEWING - AGGREGATE PERCENTAGES	/	RANGE per STATIONS
2000	76.5%		35-99%
2001	77.2%		37-99%
2002	80.1%		1-99%
2003	82.0%		37-99%

EXHIBIT 7

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
1	WBNS		4730	13440	35.2%
2	WPIX	Yes	7807	21504	36.3%
3	WFAA		7682	16128	47.6%
4	KATV		6681	13440	49.7%
5	KWGN	Yes	8141	16128	50.5%
6	KMGH		8496	16128	52.7%
7	KCNC		9070	16128	56.2%
8	WGKI		1520	2688	56.5%
9	KUSA		9121	16128	56.6%
10	WUAB	Yes	9319	16128	57.8%
11	WSYX		7832	13440	58.3%
12	KTLA	Yes	12540	21504	58.3%
13	WSB		12736	21504	59.2%
14	WGN	Yes	13167	21503	61.2%
15	KABC		13451	21504	62.6%
16	WSEE		8581	13440	63.8%
17	KPTV	Yes	8624	13440	64.2%
18	WSBK	Yes	13800	21504	64.2%
19	KARK		8659	13440	64.4%
20	WNBC		13862	21504	64.5%
21	WUSA		13985	21504	65.0%
22	KTHV		9053	13440	67.4%
23	WFQX	Yes	7515	10752	69.9%
24	WIS		9447	13440	70.3%
25	WKBD	Yes	15202	21504	70.7%
26	WKYT		9515	13440	70.8%
27	WBAL		15299	21504	71.1%
28	WWOR	Yes	15311	21504	71.2%
29	WXIA		15319	21504	71.2%
30	KMSP	Yes	15345	21504	71.4%
31	WCAU		15458	21504	71.9%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
32	WNYW	Yes	15545	21504	72.3%
33	WTAE		15674	21504	72.9%
34	KCAL	Yes	15682	21504	72.9%
35	WPHL	Yes	16010	21504	74.5%
36	KGO		16122	21504	75.0%
37	WJZ		16166	21504	75.2%
38	KNBC		16357	21504	76.1%
39	WAGA	Yes	16653	21504	77.4%
40	KSDK		16787	21504	78.1%
41	KXTX	Yes	12602	16128	78.1%
42	KMBC		16805	21504	78.1%
43	WDCA	Yes	16889	21504	78.5%
44	WTFX	Yes	17004	21504	79.1%
45	WKRN		10635	13440	79.1%
46	WUNI	Yes	17032	21504	79.2%
47	WPXI		17039	21504	79.2%
48	WFLD	Yes	17211	21504	80.0%
49	KCRA		10883	13440	81.0%
50	KSHB		17596	21504	81.8%
51	WBZ		17726	21504	82.4%
52	KPLR	Yes	17763	21504	82.6%
53	KTVU	Yes	17831	21504	82.9%
4	WDIV		17952	21504	83.5%
55	KCOP	Yes	17969	21504	83.6%
56	WXIX	Yes	18204	21504	84.7%
57	WBRC	Yes	11394	13440	84.8%
58	KDKA		18260	21504	84.9%
59	WBRE		11455	13440	85.2%
60	WRIC		11507	13440	85.6%
61	WBZL	Yes	18545	21504	86.2%
62	KPIX		18636	21504	86.7%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
63	WPSG	Yes	18771	21504	87.3%
64	WVTV	Yes	18871	21504	87.8%
65	KICU	Yes	18983	21504	88.3%
66	WTRF		12050	13440	89.7%
67	KRON		19387	21504	90.2%
68	WPVI		19405	21504	90.2%
69	WLVI	Yes	19733	21504	91.8%
70	WTVD		12351	13440	91.9%
71	WCFT		12396	13440	92.2%
72	WITN		12439	13440	92.6%
73	WGNX		7588	8064	94.1%
74	WISN		17711	18816	94.1%
75	WTMJ		20245	21504	94.1%
76	WGCL		12685	13440	94.4%
77	KYW		20365	21504	94.7%
78	WIAT		12747	13440	94.8%
79	WBPX	Yes	20711	21504	96.3%
80	KTNC	Yes	18265	18816	97.1%
81	KBWB	Yes	20897	21504	97.2%
82	KTXL	Yes	13157	13440	97.9%
83	WHUB	Yes	5349	5376	99.5%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
1	WPIX	Yes	6119	16128	37.9%
2	WBNS		4218	10752	39.2%
3	WFAA		6648	13440	49.5%
4	KFOR		5400	10752	50.2%
5	KWTV		5962	10752	55.5%
6	KATV		5969	10752	55.5%
7	KWGN	Yes	7479	13440	55.6%
8	KMGH		7972	13440	59.3%
9	WNBC		9649	16128	59.8%
10	WSB		9663	16128	59.9%
11	WGN	Yes	9770	16128	60.6%
12	KCNC		8158	13440	60.7%
13	KUSA		8199	13440	61.0%
14	KTLA	Yes	9976	16128	61.9%
15	WSBK	Yes	9996	16128	62.0%
16	KABC		10089	16128	62.6%
17	KTHV		6845	10752	63.7%
18	WUAB	Yes	8700	13440	64.7%
19	KPTV	Yes	6979	10752	64.9%
20	WSEE		6980	10752	64.9%
21	WUSA		10516	16128	65.2%
22	WSYX		7055	10752	65.6%
23	WIS		7113	10752	66.2%
24	WLTV	Yes	7116	10752	66.2%
25	WBAL		10749	16128	66.6%
26	KARK		7176	10752	66.7%
27	WTTG	Yes	7250	10752	67.4%
28	WFQX	Yes	7425	10752	69.1%
29	WXIA		11161	16128	69.2%
30	WCCO		7481	10752	69.6%
31	WCAU		11277	16128	69.9%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
32	KMSP	Yes	11313	16128	70.1%
33	WKBD	Yes	11499	16128	71.3%
34	WNYW	Yes	11503	16128	71.3%
35	WRC		7832	10752	72.8%
36	WKYT		7870	10752	73.2%
37	KNBC		11875	16128	73.6%
38	WPHL	Yes	11890	16128	73.7%
39	WWOR	Yes	11896	16128	73.8%
40	WJZ		11913	16128	73.9%
41	KCAL	Yes	11938	16128	74.0%
42	WTAE		12022	16128	74.5%
43	WAGA	Yes	12156	16128	75.4%
44	WTFX	Yes	12228	16128	75.8%
45	WUNI	Yes	12233	16128	75.8%
46	KSDK		12385	16128	76.8%
47	WCVB		8291	10752	77.1%
48	WPXI		12635	16128	78.3%
49	KMBC		12748	16128	79.0%
50	KGO		12772	16128	79.2%
51	WDCA	Yes	12822	16128	79.5%
52	WKRN		8573	10752	79.7%
53	WBRZ		8625	10752	80.2%
54	KSHB		12944	16128	80.3%
55	WCMH		8655	10752	80.5%
56	KCRA		8728	10752	81.2%
57	WFLD	Yes	13137	16128	81.5%
58	WPTY		8796	10752	81.8%
59	WBRE		8805	10752	81.9%
60	WBZ		13265	16128	82.2%
61	KPLR	Yes	13292	16128	82.4%
62	KTVU	Yes	13367	16128	82.9%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
63	KXTX	Yes	11222	13440	83.5%
64	WDIV		13516	16128	83.8%
65	KCOP	Yes	13529	16128	83.9%
66	WBZL	Yes	13549	16128	84.0%
67	WGAL		9126	10752	84.9%
68	WXIX	Yes	13874	16128	86.0%
69	WPGH	Yes	9251	10752	86.0%
70	KSTW	Yes	9278	10752	86.3%
71	WPSG	Yes	13967	16128	86.6%
72	KDKA		13998	16128	86.8%
73	WRIC		9428	10752	87.7%
74	WDRB	Yes	9501	10752	88.4%
75	WTAJ		9638	10752	89.6%
76	KICU	Yes	14469	16128	89.7%
77	KRON		14479	16128	89.8%
78	WPVI		14571	16128	90.3%
79	WWBT		9717	10752	90.4%
80	WALA	Yes	9748	10752	90.7%
81	WLYH	Yes	9753	10752	90.7%
82	WPMT	Yes	9855	10752	91.7%
83	WNWO		9932	10752	92.4%
84	WTVB		9949	10752	92.5%
85	WVTV	Yes	14956	16128	92.7%
86	WTMJ		14984	16128	92.9%
87	WIAT		10192	10752	94.8%
88	WGCL		15301	16128	94.9%
89	WISN		15339	16128	95.1%
90	WMAR		10248	10752	95.3%
91	KYW		15442	16128	95.7%
92	WITN		10358	10752	96.3%
93	KBWB	Yes	15602	16128	96.7%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
94	WPCB	Yes	10517	10752	97.8%
95	KTXL	Yes	10552	10752	98.1%
96	KTNC	Yes	15839	16128	98.2%
97	WKPT		10610	10752	98.7%
98	WLVI	Yes	5376	5376	100.0%
99	KPIX		5376	5376	100.0%
100	WBPX	Yes	5376	5376	100.0%
101	WHUB	Yes	2688	2688	100.0%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
1	WTBS	Yes	199	21504	0.9%
2	WBNS		5217	13440	38.8%
3	WPIX	Yes	10322	21504	48.0%
4	WFAA		8232	16128	51.0%
5	KFOR		6869	13440	51.1%
6	KATU		6936	13440	51.6%
7	KWGN	Yes	8384	16128	52.0%
8	KATV		7349	13440	54.7%
9	KUSA		9624	16128	59.7%
10	KWTV		8066	13440	60.0%
11	KCNC		9802	16128	60.8%
12	KMGH		9832	16128	61.0%
13	KTHV		8270	13440	61.5%
14	WUAB	Yes	10148	16128	62.9%
15	WGN	Yes	13597	21504	63.2%
16	WNBC		13620	21504	63.3%
17	WSBK	Yes	13724	21504	63.8%
18	WSB		13727	21504	63.8%
19	WLKY		8774	13440	65.3%
20	WIS		8804	13440	65.5%
21	WSEE		8913	13440	66.3%
22	KTLA	Yes	14360	21504	66.8%
23	WSYX		9020	13440	67.1%
24	KABC		14435	21504	67.1%
25	KARK		9040	13440	67.3%
26	WKYT		9142	13440	68.0%
27	KPTV	Yes	9248	13440	68.8%
28	WXIA		15026	21504	69.9%
29	WUSA		15067	21504	70.1%
30	WUNI	Yes	13295	18816	70.7%
31	WFQX	Yes	9499	13440	70.7%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
32	WKBD	Yes	15381	21504	71.5%
33	WBAL		15553	21504	72.3%
34	KGW		9885	13440	73.5%
35	WIBW		9917	13440	73.8%
36	WCAU		15890	21504	73.9%
37	WPHL	Yes	16040	21504	74.6%
38	KCAL	Yes	16276	21504	75.7%
39	KDFW	Yes	12251	16128	76.0%
40	WTAE		16452	21504	76.5%
41	WJZ		16548	21504	77.0%
42	WNYW	Yes	16633	21504	77.3%
43	WFLD	Yes	16666	21504	77.5%
44	WLIO		10546	13440	78.5%
45	KNBC		16939	21504	78.8%
46	WBRC	Yes	10634	13440	79.1%
47	KSL		10669	13440	79.4%
48	WHBQ	Yes	10701	13440	79.6%
49	WTFX	Yes	17174	21504	79.9%
50	KSDK		17184	21504	79.9%
51	WNCT		10743	13440	79.9%
52	KCRA		10773	13440	80.2%
53	WBRZ		10811	13440	80.4%
54	KMSP	Yes	17404	21504	80.9%
55	WBZ		17405	21504	80.9%
56	WWOR	Yes	17406	21504	80.9%
57	WDCA	Yes	17476	21504	81.3%
58	KMBC		17552	21504	81.6%
59	KSHB		17616	21504	81.9%
60	WAGA	Yes	17628	21504	82.0%
61	KGO		17730	21504	82.4%
62	KCBS		17816	21504	82.8%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
63	KTVU	Yes	17865	21504	83.1%
64	WXIX	Yes	17888	21504	83.2%
65	KPLR	Yes	17904	21504	83.3%
66	WCVB		18069	21504	84.0%
67	WCFT		11398	13440	84.8%
68	WDIV		18296	21504	85.1%
69	WCHS		11438	13440	85.1%
70	KETV		11444	13440	85.1%
71	WHDH		18328	21504	85.2%
72	WBRE		11477	13440	85.4%
73	WKRN		11558	13440	86.0%
74	KICU	Yes	18494	21504	86.0%
75	KCOP	Yes	18527	21504	86.2%
76	KDKA		18565	21504	86.3%
77	WRIC		11671	13440	86.8%
78	WPSG	Yes	18768	21504	87.3%
79	WWLP		11749	13440	87.4%
80	WAFB		11783	13440	87.7%
81	WBZL	Yes	18891	21504	87.8%
82	WMAQ		19023	21504	88.5%
83	KPIX		19073	21504	88.7%
84	WWBT		12008	13440	89.3%
85	WXIN	Yes	14424	16128	89.4%
86	WBBM		19616	21504	91.2%
87	WCWB	Yes	19660	21504	91.4%
88	KSTW	Yes	14750	16128	91.5%
89	WTMJ		19694	21504	91.6%
90	WALA	Yes	12341	13440	91.8%
91	WTVB		12350	13440	91.9%
92	WJW	Yes	14827	16128	91.9%
93	WPMT	Yes	12364	13440	92.0%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
94	KUVS	Yes	12428	13440	92.5%
95	WLVI	Yes	19894	21504	92.5%
96	WEWS		14991	16128	93.0%
97	WFTC	Yes	20094	21504	93.4%
98	WLYH	Yes	12563	13440	93.5%
99	WPVI		20110	21504	93.5%
100	KMTV		12571	13440	93.5%
101	WGCL		20119	21504	93.6%
102	WTOV		12637	13440	94.0%
103	WVTV	Yes	20326	21504	94.5%
104	WITN		12718	13440	94.6%
105	KTNC	Yes	20395	21504	94.8%
106	WTGS	Yes	12754	13440	94.9%
107	WIAT		12768	13440	95.0%
108	WTRF		12797	13440	95.2%
109	WISN		20536	21504	95.5%
110	KRON	Yes	20657	21504	96.1%
111	WNWO		12939	13440	96.3%
112	KYW		20723	21504	96.4%
113	WPXS	Yes	20937	21504	97.4%
114	KBHK	Yes	20999	21504	97.7%
115	WWHO	Yes	13148	13440	97.8%
116	KXTX	Yes	15780	16128	97.8%
117	WGGB		13163	13440	97.9%
118	WSFJ	Yes	13176	13440	98.0%
119	KTXL	Yes	13288	13440	98.9%
120	WGME		13307	13440	99.0%
121	WTLW	Yes	13420	13440	99.9%
122	WGTW	Yes	21484	21504	99.9%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
32	WSMV		10061	13440	74.9%
33	WPHL	Yes	16117	21504	74.9%
34	WCAU		16348	21504	76.0%
35	WNYW	Yes	16705	21504	77.7%
36	WTAE		16717	21504	77.7%
37	WFQX	Yes	10491	13440	78.1%
38	KCAL	Yes	16989	21504	79.0%
39	WBZ		17132	21504	79.7%
40	WPXI		17175	21504	79.9%
41	KNBC		17203	21504	80.0%
42	WTFX	Yes	17216	21504	80.1%
43	KTVT		12977	16128	80.5%
44	KMBC		17312	21504	80.5%
45	WFXT	Yes	17328	21504	80.6%
46	WRC		17334	21504	80.6%
47	WFLD	Yes	17401	21504	80.9%
48	WLTN	Yes	17412	21504	81.0%
49	WLEX		10889	13440	81.0%
50	WMC		10980	13440	81.7%
51	WNCT		11015	13440	82.0%
52	WXIX	Yes	17701	21504	82.3%
53	KSDK		17703	21504	82.3%
54	WNPA		17719	21504	82.4%
55	WBRC	Yes	11095	13440	82.6%
56	WAGA	Yes	17811	21504	82.8%
57	KSL		11157	13440	83.0%
58	WDIV		17858	21504	83.0%
59	WVLA		11175	13440	83.1%
60	WTTG	Yes	17889	21504	83.2%
61	KCRA		11186	13440	83.2%
62	WHDH		17996	21504	83.7%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
32	WNYW	Yes	15545	21504	72.3%
33	WTAE		15674	21504	72.9%
34	KCAL	Yes	15682	21504	72.9%
35	WPHL	Yes	16010	21504	74.5%
36	KGO		16122	21504	75.0%
37	WJZ		16166	21504	75.2%
38	KNBC		16357	21504	76.1%
39	WAGA	Yes	16653	21504	77.4%
40	KSDK		16787	21504	78.1%
41	KXTX	Yes	12602	16128	78.1%
42	KMBC		16805	21504	78.1%
43	WDCA	Yes	16889	21504	78.5%
44	WTFX	Yes	17004	21504	79.1%
45	WKRN		10635	13440	79.1%
46	WUNI	Yes	17032	21504	79.2%
47	WPXI		17039	21504	79.2%
48	WFLD	Yes	17211	21504	80.0%
49	KCRA		10883	13440	81.0%
50	KSHB		17596	21504	81.8%
51	WBZ		17726	21504	82.4%
52	KPLR	Yes	17763	21504	82.6%
53	KTVU	Yes	17831	21504	82.9%
4	WDIV		17952	21504	83.5%
55	KCOP	Yes	17969	21504	83.6%
56	WXIX	Yes	18204	21504	84.7%
57	WBRC	Yes	11394	13440	84.8%
58	KDKA		18260	21504	84.9%
59	WBRE		11455	13440	85.2%
60	WRIC		11507	13440	85.6%
61	WBZL	Yes	18545	21504	86.2%
62	KPIX		18636	21504	86.7%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
63	WPSG	Yes	18771	21504	87.3%
64	WVTV	Yes	18871	21504	87.8%
65	KICU	Yes	18983	21504	88.3%
66	WTRF		12050	13440	89.7%
67	KRON		19387	21504	90.2%
68	WPVI		19405	21504	90.2%
69	WLVI	Yes	19733	21504	91.8%
70	WTVD		12351	13440	91.9%
71	WCFT		12396	13440	92.2%
72	WITN		12439	13440	92.6%
73	WGNX		7588	8064	94.1%
74	WISN		17711	18816	94.1%
75	WTMJ		20245	21504	94.1%
76	WGCL		12685	13440	94.4%
77	KYW		20365	21504	94.7%
78	WIAT		12747	13440	94.8%
79	WPX	Yes	20711	21504	96.3%
80	KTNC	Yes	18265	18816	97.1%
81	KBWB	Yes	20897	21504	97.2%
82	KTXL	Yes	13157	13440	97.9%
83	WHUB	Yes	5349	5376	99.5%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
1	WPIX	Yes	6119	16128	37.9%
2	WBNS		4218	10752	39.2%
3	WFAA		6648	13440	49.5%
4	KFOR		5400	10752	50.2%
5	KWTV		5962	10752	55.5%
6	KATV		5969	10752	55.5%
7	KWGN	Yes	7479	13440	55.6%
8	KMGH		7972	13440	59.3%
9	WNBC		9649	16128	59.8%
10	WSB		9663	16128	59.9%
11	WGN	Yes	9770	16128	60.6%
12	KCNC		8158	13440	60.7%
13	KUSA		8199	13440	61.0%
14	KTLA	Yes	9976	16128	61.9%
15	WSBK	Yes	9996	16128	62.0%
16	KABC		10089	16128	62.6%
17	KTHV		6845	10752	63.7%
18	WUAB	Yes	8700	13440	64.7%
19	KPTV	Yes	6979	10752	64.9%
20	WSEE		6980	10752	64.9%
21	WUSA		10516	16128	65.2%
22	WSYX		7055	10752	65.6%
23	WIS		7113	10752	66.2%
24	WLTV	Yes	7116	10752	66.2%
25	WBAL		10749	16128	66.6%
26	KARK		7176	10752	66.7%
27	WTTG	Yes	7250	10752	67.4%
28	WFQX	Yes	7425	10752	69.1%
29	WXIA		11161	16128	69.2%
30	WCCO		7481	10752	69.6%
31	WCAU		11277	16128	69.9%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
32	KMSP	Yes	11313	16128	70.1%
33	WKBD	Yes	11499	16128	71.3%
34	WNYW	Yes	11503	16128	71.3%
35	WRC		7832	10752	72.8%
36	WKYT		7870	10752	73.2%
37	KNBC		11875	16128	73.6%
38	WPHL	Yes	11890	16128	73.7%
39	WWOR	Yes	11896	16128	73.8%
40	WJZ		11913	16128	73.9%
41	KCAL	Yes	11938	16128	74.0%
42	WTAE		12022	16128	74.5%
43	WAGA	Yes	12156	16128	75.4%
44	WTFX	Yes	12228	16128	75.8%
45	WUNI	Yes	12233	16128	75.8%
46	KSDK		12385	16128	76.8%
47	WCVB		8291	10752	77.1%
48	WPXI		12635	16128	78.3%
49	KMBC		12748	16128	79.0%
50	KGO		12772	16128	79.2%
51	WDCA	Yes	12822	16128	79.5%
52	WKRN		8573	10752	79.7%
53	WBRZ		8625	10752	80.2%
54	KSHB		12944	16128	80.3%
55	WCMH		8655	10752	80.5%
56	KCRA		8728	10752	81.2%
57	WFLD	Yes	13137	16128	81.5%
58	WPTY		8796	10752	81.8%
59	WBRE		8805	10752	81.9%
60	WBZ		13265	16128	82.2%
61	KPLR	Yes	13292	16128	82.4%
62	KTVU	Yes	13367	16128	82.9%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
63	KXTX	Yes	11222	13440	83.5%
64	WDIV		13516	16128	83.8%
65	KCOP	Yes	13529	16128	83.9%
66	WBZL	Yes	13549	16128	84.0%
67	WGAL		9126	10752	84.9%
68	WXIX	Yes	13874	16128	86.0%
69	WPGH	Yes	9251	10752	86.0%
70	KSTW	Yes	9278	10752	86.3%
71	WPSG	Yes	13967	16128	86.6%
72	KDKA		13998	16128	86.8%
73	WRIC		9428	10752	87.7%
74	WDRB	Yes	9501	10752	88.4%
75	WTAJ		9638	10752	89.6%
76	KICU	Yes	14469	16128	89.7%
77	KRON		14479	16128	89.8%
78	WPVI		14571	16128	90.3%
79	WWBT		9717	10752	90.4%
80	WALA	Yes	9748	10752	90.7%
81	WLYH	Yes	9753	10752	90.7%
82	WPMT	Yes	9855	10752	91.7%
83	WNWO		9932	10752	92.4%
84	WTVB		9949	10752	92.5%
85	WVTV	Yes	14956	16128	92.7%
86	WTMJ		14984	16128	92.9%
87	WIAT		10192	10752	94.8%
88	WGCL		15301	16128	94.9%
89	WISN		15339	16128	95.1%
90	WMAR		10248	10752	95.3%
91	KYW		15442	16128	95.7%
92	WITN		10358	10752	96.3%
93	KBWB	Yes	15602	16128	96.7%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
94	WPCB	Yes	10517	10752	97.8%
95	KTXL	Yes	10552	10752	98.1%
96	KTNC	Yes	15839	16128	98.2%
97	WKPT		10610	10752	98.7%
98	WLVI	Yes	5376	5376	100.0%
99	KPIX		5376	5376	100.0%
100	WBPX	Yes	5376	5376	100.0%
101	WHUB	Yes	2688	2688	100.0%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
1	WTBS	Yes	199	21504	0.9%
2	WBNS		5217	13440	38.8%
3	WPIX	Yes	10322	21504	48.0%
4	WFAA		8232	16128	51.0%
5	KFOR		6869	13440	51.1%
6	KATU		6936	13440	51.6%
7	KWGN	Yes	8384	16128	52.0%
8	KATV		7349	13440	54.7%
9	KUSA		9624	16128	59.7%
10	KWTV		8066	13440	60.0%
11	KCNC		9802	16128	60.8%
12	KMGH		9832	16128	61.0%
13	KTHV		8270	13440	61.5%
14	WUAB	Yes	10148	16128	62.9%
15	WGN	Yes	13597	21504	63.2%
16	WNBC		13620	21504	63.3%
17	WSBK	Yes	13724	21504	63.8%
18	WSB		13727	21504	63.8%
19	WLKY		8774	13440	65.3%
20	WIS		8804	13440	65.5%
21	WSEE		8913	13440	66.3%
22	KTLA	Yes	14360	21504	66.8%
23	WSYX		9020	13440	67.1%
24	KABC		14435	21504	67.1%
25	KARK		9040	13440	67.3%
26	WKYT		9142	13440	68.0%
27	KPTV	Yes	9248	13440	68.8%
28	WXIA		15026	21504	69.9%
29	WUSA		15067	21504	70.1%
30	WUNI	Yes	13295	18816	70.7%
31	WFQX	Yes	9499	13440	70.7%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
32	WKBD	Yes	15381	21504	71.5%
33	WBAL		15553	21504	72.3%
34	KGW		9885	13440	73.5%
35	WIBW		9917	13440	73.8%
36	WCAU		15890	21504	73.9%
37	WPHL	Yes	16040	21504	74.6%
38	KCAL	Yes	16276	21504	75.7%
39	KDFW	Yes	12251	16128	76.0%
40	WTAE		16452	21504	76.5%
41	WJZ		16548	21504	77.0%
42	WNYW	Yes	16633	21504	77.3%
43	WFLD	Yes	16666	21504	77.5%
44	WLIO		10546	13440	78.5%
45	KNBC		16939	21504	78.8%
46	WBRC	Yes	10634	13440	79.1%
47	KSL		10669	13440	79.4%
48	WHBQ	Yes	10701	13440	79.6%
49	WTFX	Yes	17174	21504	79.9%
50	KSDK		17184	21504	79.9%
51	WNCT		10743	13440	79.9%
52	KCRA		10773	13440	80.2%
53	WBRZ		10811	13440	80.4%
54	KMSP	Yes	17404	21504	80.9%
55	WBZ		17405	21504	80.9%
56	WWOR	Yes	17406	21504	80.9%
57	WDCA	Yes	17476	21504	81.3%
58	KMBC		17552	21504	81.6%
59	KSHB		17616	21504	81.9%
60	WAGA	Yes	17628	21504	82.0%
61	KGO		17730	21504	82.4%
62	KCBS		17816	21504	82.8%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
63	KTVU	Yes	17865	21504	83.1%
64	WXIX	Yes	17888	21504	83.2%
65	KPLR	Yes	17904	21504	83.3%
66	WCVB		18069	21504	84.0%
67	WCFT		11398	13440	84.8%
68	WDIV		18296	21504	85.1%
69	WCHS		11438	13440	85.1%
70	KETV		11444	13440	85.1%
71	WHDH		18328	21504	85.2%
72	WBRE		11477	13440	85.4%
73	WKRN		11558	13440	86.0%
74	KICU	Yes	18494	21504	86.0%
75	KCOP	Yes	18527	21504	86.2%
76	KDKA		18565	21504	86.3%
77	WRIC		11671	13440	86.8%
78	WPSG	Yes	18768	21504	87.3%
79	WWLP		11749	13440	87.4%
80	WAFB		11783	13440	87.7%
81	WBZL	Yes	18891	21504	87.8%
82	WMAQ		19023	21504	88.5%
83	KPIX		19073	21504	88.7%
84	WWBT		12008	13440	89.3%
85	WXIN	Yes	14424	16128	89.4%
86	WBBM		19616	21504	91.2%
87	WCWB	Yes	19660	21504	91.4%
88	KSTW	Yes	14750	16128	91.5%
89	WTMJ		19694	21504	91.6%
90	WALA	Yes	12341	13440	91.8%
91	WTVD		12350	13440	91.9%
92	WJW	Yes	14827	16128	91.9%
93	WPMT	Yes	12364	13440	92.0%

##	STATION	INDEPENDENT?	"ZERO VIEWING" INSTANCES	AGGREGATE INSTANCES	"ZERO VIEWING" PERCENTAGE
94	KUVS	Yes	12428	13440	92.5%
95	WLVI	Yes	19894	21504	92.5%
96	WEWS		14991	16128	93.0%
97	WFTC	Yes	20094	21504	93.4%
98	WLYH	Yes	12563	13440	93.5%
99	WPVI		20110	21504	93.5%
100	KMTV		12571	13440	93.5%
101	WGCL		20119	21504	93.6%
102	WTOV		12637	13440	94.0%
103	WVTV	Yes	20326	21504	94.5%
104	WITN		12718	13440	94.6%
105	KTNC	Yes	20395	21504	94.8%
106	WTGS	Yes	12754	13440	94.9%
107	WIAT		12768	13440	95.0%
108	WTRF		12797	13440	95.2%
109	WISN		20536	21504	95.5%
110	KRON	Yes	20657	21504	96.1%
111	WNWO		12939	13440	96.3%
112	KYW		20723	21504	96.4%
113	WPXS	Yes	20937	21504	97.4%
114	KBHK	Yes	20999	21504	97.7%
115	WWHO	Yes	13148	13440	97.8%
116	KXTX	Yes	15780	16128	97.8%
117	WGGB		13163	13440	97.9%
118	WSFJ	Yes	13176	13440	98.0%
119	KTXL	Yes	13288	13440	98.9%
120	WGME		13307	13440	99.0%
121	WTLW	Yes	13420	13440	99.9%
122	WGTW	Yes	21484	21504	99.9%

EXHIBIT 8

ABC shows (2000; highest to lowest viewing)

4/24/2013

ID	Field1	Field2	Field3	Field4	Field5	Field6	Field7	Field8
1267176		KABC	ABC-NITELINE	2445 A		2	1	156024
1267175		KABC	ABC-NITELINE	2445 A		2	1	156024
1267080		KABC	ABC-NITELINE	2445 A		2	1	156024
1267079		KABC	ABC-NITELINE	2445 A		2	1	156024
1266887		KABC	ABC-NITELINE	2445 A		2	1	156024
1267013		KABC	GD MRN AMR-	2498 A		2	1	150773
1267110		KABC	GD MRN AMR-	2498 A		2	1	150773
1267109		KABC	GD MRN AMR-	2498 A		2	1	150773
1267014		KABC	GD MRN AMR-	2498 A		2	1	150773
1266918		KABC	GD MRN AMR-	2498 A		2	1	150773
1266726		KABC	GD MRN AMR-	2498 A		2	1	150773
1266822		KABC	GD MRN AMR-	2498 A		2	1	150773
1266917		KABC	GD MRN AMR-	2498 A		2	1	150773
1266821		KABC	GD MRN AMR-	2498 A		2	1	150773
1266725		KABC	GD MRN AMR-	2498 A		2	1	150773
109089		KABC	GENRL HOSPIT	2019 A		2	0	142463
109092		KABC	GENRL HOSPIT	2019 A		2	0	142463
109091		KABC	GENRL HOSPIT	2019 A		2	0	142463
109090		KABC	GENRL HOSPIT	2019 A		2	0	142463
109086		KABC	1 LIFE TO LIVE	2037 A		2	0	114771
109186		KABC	GENRL HOSPIT	2019 A		2	0	114771
109088		KABC	1 LIFE TO LIVE	2037 A		2	0	114771
109185		KABC	GENRL HOSPIT	2019 A		2	0	114771
109087		KABC	1 LIFE TO LIVE	2037 A		2	0	114771
109187		KABC	GENRL HOSPIT	2019 A		2	0	114771
109284		KABC	GENRL HOSPIT	2019 A		2	0	114771
109283		KABC	GENRL HOSPIT	2019 A		2	0	114771
109282		KABC	GENRL HOSPIT	2019 A		2	0	114771
109281		KABC	GENRL HOSPIT	2019 A		2	0	114771
109188		KABC	GENRL HOSPIT	2019 A		2	0	114771
109788		KABC	MILN-WE SP-A	203981 A		2	0	102480

CBS shows (2000; highest to lowest viewing)

4/24/2013

ID	Field1	Field2	Field3	Field4	Field5	Field6	Field7	Field8
124440		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124727		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124726		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124725		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124632		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124631		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124728		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124629		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124438		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124439		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124437		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124344		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124343		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124342		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124341		KPIX	YOUNG&RESTL	3059 C		2	0	70584
124630		KPIX	YOUNG&RESTL	3059 C		2	0	70584
832199		KDKA	D LETTRMAN-C	3445 C		10	0	65065
832200		KDKA	D LETTRMAN-C	3445 C		10	0	65065
832104		KDKA	D LETTRMAN-C	3445 C		10	0	65065
832103		KDKA	D LETTRMAN-C	3445 C		10	0	65065
832008		KDKA	D LETTRMAN-C	3445 C		10	0	65065
832007		KDKA	D LETTRMAN-C	3445 C		10	0	65065
124723		KPIX	PRICE-RT 2-CBS	3046 C		2	0	64704
124625		KPIX	PRICE-RT 1-CBS	3045 C		2	0	64704
124627		KPIX	PRICE-RT 2-CBS	3046 C		2	0	64704
124628		KPIX	PRICE-RT 2-CBS	3046 C		2	0	64704
124626		KPIX	PRICE-RT 1-CBS	3045 C		2	0	64704
124722		KPIX	PRICE-RT 1-CBS	3045 C		2	0	64704
124724		KPIX	PRICE-RT 2-CBS	3046 C		2	0	64704
124721		KPIX	PRICE-RT 1-CBS	3045 C		2	0	64704
124643		KPIX	GUIDING LIGHT	3023 C		2	0	52603

NBC shows (2000; highest to lowest viewing)

4/24/2013

ID	Field1	Field2	Field3	Field4	Field5	Field6	Field7	Field8
786345		WNBC	TODAY SHW	1043 N		10	0	192042
786537		WNBC	TODAY SHW	1043 N		10	0	192042
786249		WNBC	TODAY SHW	1043 N		10	0	192042
786441		WNBC	TODAY SHW	1043 N		10	0	192042
786588		WNBC	FRIENDS-SL-NB	196887 N		10	0	168251
786587		WNBC	FRIENDS-SL-NB	196887 N		10	0	168251
117863		KNBC	TONITE SHW-N	1045 N		2	0	142119
118055		KNBC	TONITE SHW-N	1045 N		2	0	142119
786442		WNBC	TODAY SHW	1043 N		10	0	139180
786443		WNBC	TODAY SHW	1043 N		10	0	139180
786252		WNBC	TODAY SHW	1043 N		10	0	139180
786347		WNBC	TODAY SHW	1043 N		10	0	139180
786346		WNBC	TODAY SHW	1043 N		10	0	139180
786444		WNBC	TODAY SHW	1043 N		10	0	139180
786251		WNBC	TODAY SHW	1043 N		10	0	139180
786538		WNBC	TODAY SHW	1043 N		10	0	139180
786348		WNBC	TODAY SHW	1043 N		10	0	139180
786250		WNBC	TODAY SHW	1043 N		10	0	139180
786633		WNBC	TODAY SHW	1043 N		10	0	139180
786634		WNBC	TODAY SHW	1043 N		10	0	139180
786635		WNBC	TODAY SHW	1043 N		10	0	139180
786636		WNBC	TODAY SHW	1043 N		10	0	139180
786593		WNBC	E.R.-NBC	48032 N		10	0	132193
786586		WNBC	FRIENDS-NBC	48030 N		10	0	116954
786585		WNBC	FRIENDS-NBC	48030 N		10	0	116954
786491		WNBC	TITANS-NBC	220476 N		10	0	114546
786490		WNBC	TITANS-NBC	220476 N		10	0	114546
786489		WNBC	TITANS-NBC	220476 N		10	0	114546
786300		WNBC	TUCKER-NBC	220474 N		10	0	114546
786492		WNBC	TITANS-NBC	220476 N		10	0	114546
786297		WNBC	DADDIO-NBC	204793 N		10	0	114546

EXHIBIT 9

Nielsen Average viewers per Diary broadcast

4/25/2013

2000	2001	2002	2003
1,682	1,408	4,597	2,494

EXHIBIT 10

Nielsen % of broadcasts with under 5,000 viewers

4/25/2013

2000	2001	2002	2003
93.57%	95.00%	94.94%	95.96%

EXHIBIT 11

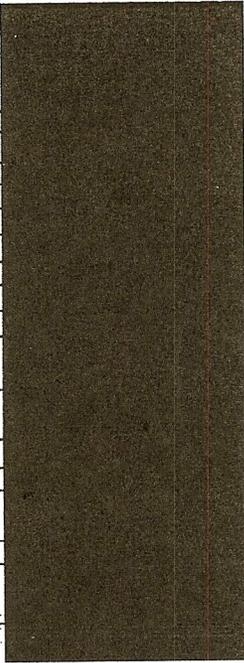
	WSG client*	WSG representation through*	MPAA claimed years	No MPAA contract existent directly with claimant, only with ostensible "agent", and entered into subsequent to IPG contract	MPAA contract entered into subsequent to IPG contract
1	Best Direct International	2001	2000-02	x	
2	Beyond International	2000	2000-02	x	
3	Carol Reynolds Productions Inc.	entire	2000-01	x	
4	Cinemavault Releasing	entire	2000-03	x	
5	DreamWorks LLC	30-Jun-03	2001-03		x
6	Eagle Rock Entertainment	entire	2001	x	
7	Fitness Quest Inc.	2001	2000-03	x	
8	Integrity Global Marketing Inc.	entire	2000-03	x	
9	Litton Syndication	entire	2001-03		x
10	Marty Stouffer Productions	30-Jun-03	2001-03		x
11	O. Atlas Enterprises	30-Jun-03	2000-03		x
12	Pacific Family Entertainment	entire	2001-03	x	
13	Remodeling Today, Inc. aka Today's Home	entire	2000-03		x
14	Sandra Carter Productions	30-Jun-03	2000-03		x
15	Scholastic Productions	entire	2001-03		x
16	U.S. Olympic Committee	entire	2001		x
17	Urban Latino TV, LLC	2001-03	2002-03		x
18	Ward Productions	30-Jun-03	2000-03		x
	*claims made via WSG joint claims, filed annually in July				

EXHIBIT 12

2001 Cable Copyright Certification Report
 Motion Picture Association of America / IT Processing LLC

----- Claimant=FREMANTLE MEDIA ENTERPRISES LTD (COMPACT) Category Type=MOVIE, SPECIAL OR DOCUMENTARY -----

Property Title	If Movie, Release Year
ADERRATION	1998
AGAINST THEIR WILL: WOMEN IN PRISON	1994
APPOINTMENT FOR A KILLING	1993
BABY OF THE BRIDE	1991
BABYCAKES	1989
CHASE, THE	1991
CHRISTMAS ROMANCE, A	1994
CHRISTMAS WISH, THE	1996
GOING IN THE FOUNTAIN	1990
DEADLY WHISPERS	1995
DEATH IN SMALL DOSES	1994
DEVIL'S BED, THE	1994
DOG MATIC	1996
DOUBLE EDGE	1992
GOING UNDERGROUND	1993
GREAT AMERICAN SEX SCANDAL, THE	1990
HOMICIDE: THE MOVIE	2000
IN THE DEEP WOODS	1992
LET HE TOLD	1997
LITTLE GIRL FLY AWAY	1998
LOVE CAN BE MURDER	1992
MANHUNT: SEARCH FOR THE NIGHT STALKER	1989



2001 Cable Copyright Certification Report
Motion Picture Association of America / IT Processing LLC

----- Claimant=FREMANTLE MEDIA ENTERPRISES LTD (COMPACT) Category Type=SERIES -----

Property Title	If Movie, Release Year	
ANIMAL ADVENTURES		
BAYWATCH HAWAII		
CARD SHARKS		
FAMILY FEUD		
TO TELL THE TRUTH		

Number of Titles in Category = 5



2001 Cable Copyright Certification Report
Motion Picture Association of America / IT Processing LLC

----- Claimant=FREMANTLE MEDIA ENTERPRISES LTD (COMPACT) Category Type=SERIES -----

Property Title	If Movie, Release Year
ANIMAL ADVENTURES	
BAYWATCH HAWAII	
CARD SHARKS	
FAMILY FEUD	
TO TELL THE TRUTH	



Number of Titles in Category = 5

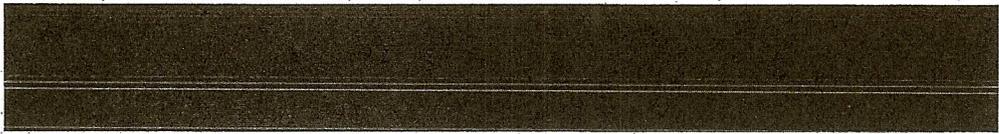


EXHIBIT 13

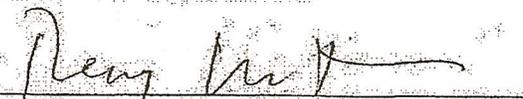
CERTIFICATION
Cable Retransmission Royalties
Calendar Year 2000

With respect to the works listed on the attached printout entitled "2000 Cable Copyright Certification Report" and dated June 6, 2004, I, the undersigned, hereby attest that I have examined or caused to be examined, each and every entry listed. With the exception of those edited out, I certify that the claimant I represent is entitled to receive 2000 cable retransmission royalties allocated to those work(s) by virtue of being:

(Check one, **but only one** of the lines.)

- (Owner other than corporation or partnership)** The owner of the programs on the printout; or
- (Agent of owner other than corporation or partnership)** The duly authorized agent of the owner of the programs on the printout; or
- (Officer or partner)** An officer (if a corporation) or a partner (if a partnership) of the legal entity identified as the owner or the authorized agent of the owner of the programs on the printout.

I declare that all the statements of fact contained herein are true, complete, and correct to the best of my knowledge, information and belief, and are made in good faith.


(Handwritten signature)

Remy Montesinos
(Typed or printed signature)

Manager AFMA Collections
(Title)

Claimant Organization: AFMA COLLECTIONS o/b/o BENNETT PRODUCTIONS INC

6/22/04
(Date)

2000 Cable Copyright Certification Report
Motion Picture Association of America / IT Processing LLC

----- Claimant=BENNETT PRODUCTIONS INC. (AFMA) Category Type=MOVIE, SPECIAL OR DOCUMENTARY -----

Property Title

If Movie,
Release Year

MISS HAWAIIAN TROPIC INTERNATIONAL PAGEANT
MISS HAWAIIAN TROPIC UNITED STATES PAGEANT

Number of Titles in Category = 2



CERTIFICATION
Cable Retransmission Royalties
Calendar Year 2000

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Reny Montesinos
(Handwritten signature)

Reny Montesinos
(Typed or printed signature)

Manager AFMA Collections
(Title)

Claimant Organization: AFMA COLLECTIONS o/b/o CAROLCO PICTURES INC

6/22/2004
(Date)

2000 Cable Copyright Certification Report
Motion Picture Association of America / IT Processing LLC

Claimant=CAROLCO PICTURES INC. (AFMA) Category Type=MOVIE, SPECIAL OR DOCUMENTARY

Property Title	If Movie, Release Year	
AIR AMERICA	1990	
BASIC INSTINCT	1992	
CHAPLIN	1992	
DARK WIND, THE	1991	
EXTREME PREJUDICE	1987	
FIRST BLOOD	1982	
IRON EAGLE II	1988	
RAMBO III	1988	
RAMBO: FIRST BLOOD PART II	1985	
RED HEAT	1988	
TERMINATOR 2: JUDGMENT DAY	1991	

Number of Titles in Category = 11

Claimant=CAROLCO PICTURES INC. (AFMA) Category Type=SERIES

Property Title	If Movie, Release Year	
RAMBO		

Number of Titles in Category = 1



CERTIFICATION
Cable Retransmission Royalties
Calendar Year 2000

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Reny Montesinos
(Handwritten signature)

Reny Montesinos
(Typed or printed signature)

Manager AFMA Collections
(Title)

Claimant Organization: AFMA COLLECTIONS o/b/o CASTLE HILL PRODUCTIONS

6/22/2004
(Date)

2000 Cable Copyright Certification Report
 Motion Picture Association of America / IT Processing LLC

Claimant=CASTLE HILL PRODUCTIONS (AFMA) Category Type=MOVIE, SPECIAL OR DOCUMENTARY

Property Title	If Movie, Release Year
ACROSS THE TRACKS	1991
ALAN & NAOMI	1992
AMERICAN SUMMER, AN	1990
BUFFALO SOLDIERS	1972
CANNIBAL WOMEN IN THE AVOCADO JUNGLE OF DEATH	1988
CLIMATE FOR KILLING, A	1991
CONCRETE WAR	1991
DAY IN OCTOBER, A	1990
FATAL BOND	1992
FENCE, THE	1994
FINAL ASSIGNMENT	1980
FINE ROMANCE, A	1992
FLINCH	1993
GROSS MISCONDUCT	1993
HAWK, THE	1993
HEIST, THE	1996
HIT AND RUN	1997
I LOVE N.Y.	1987
IN THE SPIRIT	1990
INNOCENT SLEEP, THE	1995
IRON MAZE	1991
JANE DOE	1996
KILLERS AT SEA	1985
LAST WAVE, THE	1978
LOST HONOR OF KATHRYN BECK, THE	1984
MARVIN AND TIGE	1983
NIGHT VISION	1998

MPAA-RP-01712

2000 Cable Copyright Certification Report
Motion Picture Association of America / IT Processing LLC

Claimant=CASTLE HILL PRODUCTIONS (AFMA) Category Type=MOVIE, SPECIAL OR DOCUMENTARY
(continued)

Property Title	If Movie, Release Year
ORDINARY MAGIC	1993
PAPER MASK	1990
PERFECT BRIDE, THE	1991
PRAYER OF THE ROLLERBOYS	1991
PRIMARY MOTIVE	1992
REASON TO BELIEVE, A	1995
SECRET RAPTURE, THE	1993
SEVENTH COIN, THE	1993
SHAKING THE TREE	1991
SHAKMA	1990
TERMINAL RUSH	1995
TIM	1979
VOYAGER	1991
WHY SHOOT THE TEACHER?	1977
WILDFIRE	1988

Number of Titles in Category = 42

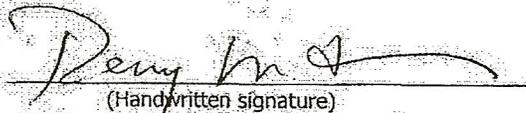
CERTIFICATION
Cable Retransmission Royalties
Calendar Year 2000

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Remy Montesinos
(Typed or printed signature)

Manager AFMA Collections
(Title)

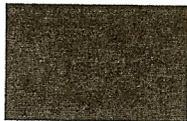
Claimant Organization: AFMA COLLECTIONS o/b/o CINEMAVALT RELEASING

6/23/04
(Date)

MPAA-RP-01714

2000 Cable Copyright Certification Report
Motion Picture Association of America / IF Processing LLC

----- Claimant=CINEMAVALT RELEASING (AFMA) Category Type=MOVIE, SPECIAL OR DOCUMENTARY -----

Property Title	If Movie, Release Year	
GRAVEYARD SHIFT	1987	

Number of Titles in Category = 1



EXHIBIT 14

2000

Claimant

- 1 AFMA Collections o/b/o Alfred Haber Inc.
- 2 AFMA Collections o/b/o Alliance Atlantis Communications Inc.
- 3 AFMA Collections o/b/o Artisan Entertainment
- 4 AFMA Collections o/b/o Bennett Productions Inc.
- 5 AFMA Collections o/b/o Carolco Pictures Inc.
- 6 AFMA Collections o/b/o Castle Hill Productions
- 7 AFMA Collections o/b/o Cinemavault Releasing
- 8 AFMA Collections o/b/o Concorde-New Horizons Corp
- 9 AFMA Collections o/b/o First Look Media (f/k/a Overseas Filmgroup)
- 10 AFMA Collections o/b/o Full Moon Pictures
- 11 AFMA Collections o/b/o Image Organization Inc.
- 12 AFMA Collections o/b/o International Keystone Entertainment Inc.
- 13 AFMA Collections o/b/o Liberty International Entertainment Inc.
- 14 AFMA Collections o/b/o Miramax Film Corporation
- 15 AFMA Collections o/b/o Moonstone Entertainment Inc.
- 16 AFMA Collections o/b/o Morgan Creek International Inc.
- 17 AFMA Collections o/b/o NU Image Inc.
- 18 AFMA Collections o/b/o PM Entertainment
- 19 AFMA Collections o/b/o Scanbox International Inc.
- 20 AFMA Collections o/b/o Showcase Entertainment Inc.
- 21 AFMA Collections o/b/o Summit Entertainment LP
- 22 AFMA Collections o/b/o The Lewis Horwitz Organization
- 23 AFMA Collections o/b/o Trimark Pictures Inc.
- 24 AFMA Collections o/b/o Troma Inc.
- 25 AFMA Collections o/b/o West Side Studios Inc.
- 26 AFMA Collections o/b/o Worldwide Flim Entertainment
- 27 AVCS o/b/o Australian Film Commission
- 28 AVCS o/b/o Hibiscus Films PTY LTD
- 29 AVCS o/b/o South Australian Film Corporation
- 30 AVCS o/b/o Southern Star Sales
- 31 CBS Broadcasting Inc. o/b/o King World Productions
- 32 Fintage Publishing & Collection BV o/b/o Beyond International
- 33 Fintage Publishing & Collection BV o/b/o Taurus 7 Film Productions
- 34 Fintage Publishing & Collection BV o/b/o Televisa
- 35 Litchfield Entertainment Company Inc. o/b/o Genesis Intermedia Inc.
- 36 Litchfield Entertainment Company Inc o/b/o Script to Screen Productions
- 37 Litchfield Entertainment Company Inc. o/b/o Hawthorne Comm. Inc.
- 38 Litchfield Entertainment Company Inc. o/b/o New West Products
- 39 Litchfield Entertainment Company Inc. o/b/o Quick N Brite
- 40 Litchfield Entertainment Company Inc. o/b/o Richard Simmons Inc.
- 41 Pacific Entertainment o/b/o Genesis Distribution Inc.

Claimants with whom MPAA has no agreement

- 42 The Canadian Broadcasting Corp. o/b/o Carol Reynolds Productions Inc.
- 43 The Canadian Broadcasting Corporation o/b/o Crescent Entertainment
- 44 The Goodman Group LLC
- 45 The Goodman Group LLC o/b/o Ackerman McQueen Inc.
- 46 The Goodman Group LLC o/b/o Amden Corporation
- 47 The Goodman Group LLC o/b/o American Marketing System Inc.
- 48 The Goodman Group LLC o/b/o Aussie Nads US Corp.
- 49 The Goodman Group LLC o/b/o Best Direct International Inc.
- 50 The Goodman Group LLC o/b/o Blitz Media Inc.
- 51 The Goodman Group LLC o/b/o Blue Stuff Inc
- 52 The Goodman Group LLC o/b/o Celebrity Products Direct Inc.
- 53 The Goodman Group LLC o/b/o Cole Media Group
- 54 The Goodman Group LLC o/b/o Danmark Inc d/b/a DMI
- 55 The Goodman Group LLC o/b/o Dermal Tone Inc.
- 56 The Goodman Group LLC o/b/o Direct Resource Management Inc.
- 57 The Goodman Group LLC o/b/o Enforma Natural Products Inc.
- 58 The Goodman Group LLC o/b/o Fitness Quest Inc.
- 59 The Goodman Group LLC o/b/o Greenstone and Company
- 60 The Goodman Group LLC o/b/o Hair Club For Men Inc.
- 61 The Goodman Group LLC o/b/o HCG Inc.
- 62 The Goodman Group LLC o/b/o HSN Direct International LTD
- 63 The Goodman Group LLC o/b/o Infotopia Inc.
- 64 The Goodman Group LLC o/b/o Integrity Global Marketing Inc.
- 65 The Goodman Group LLC o/b/o Lawman Armor Inc.
- 66 The Goodman Group LLC o/b/o Lenco Corporation
- 67 The Goodman Group LLC o/b/o Lindora Inc.
- 68 The Goodman Group LLC o/b/o Lohan Media Inc.
- 69 The Goodman Group LLC o/b/o Maximum Coverage Media Inc.
- 70 The Goodman Group LLC o/b/o Media Group LLC
- 71 The Goodman Group LLC o/b/o Media Power Inc.
- 72 The Goodman Group LLC o/b/o Merchant Media Inc.
- 73 The Goodman Group LLC o/b/o Motor Up Corp.
- 74 The Goodman Group LLC o/b/o Nightingale-Conant
- 75 The Goodman Group LLC o/b/o Nothern Outdoors Inc
- 76 The Goodman Group LLC o/b/o Orange Glo Inc.
- 77 The Goodman Group LLC o/b/o Perkins Management Inc.
- 78 The Goodman Group LLC o/b/o Phillips DRTV LLC
- 79 The Goodman Group LLC o/b/o Popeil Inventions Inc.
- 80 The Goodman Group LLC o/b/o Pure Spin Golf Inc.
- 81 The Goodman Group LLC o/b/o Qdirect Inc (a division of QVC Inc.)
- 82 The Goodman Group LLC o/b/o Reliant Interactive Media Inc.
- 83 The Goodman Group LLC o/b/o Renosky Lure CO.
- 84 The Goodman Group LLC o/b/o Respond 2 Corp.

- 85 The Goodman Group LLC o/b/o Restore4 Inc.
- 86 The Goodman Group LLC o/b/o Ronco Inventions LLC
- 87 The Goodman Group LLC o/b/o Roto Zip Tool Corp.
- 88 The Goodman Group LLC o/b/o Salton USA Inc.
- 89 The Goodman Group LLC o/b/o Sart Inventions Inc.
- 90 The Goodman Group LLC o/b/o Slymark Inc.
- 91 The Goodman Group LLC o/b/o Specialty Merchandise Corp.
- 92 The Goodman Group LLC o/b/o Suntiger Inc.
- 93 The Goodman Group LLC o/b/o Thane International Inc.
- 94 The Goodman Group LLC o/b/o The Sharper Image Inc.
- 95 The Goodman Group LLC o/b/o Tilia Inc.
- 96 The Goodman Group LLC o/b/o Time Life Inc.
- 97 The Goodman Group LLC o/b/o Transforming Cosmetics Venture Media
- 98 The Goodman Group LLC o/b/o Tyee Euro RSCG
- 99 The Goodman Group LLC o/b/o Vitalbasics Inc.

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- 1 Audio-Visual Copyright Society o/b/o Australian Broadcasting
- 2 Audio-Visual Copyright Society o/b/o Comunicado Limited
- 3 Audio-Visual Copyright Society o/b/o Film Australia LTD
- 4 Audio-Visual Copyright Society o/b/o Latent Image Productions PTY LTD
- 5 Audio-Visual Copyright Society o/b/o Murdoch Magazines PTY LTD
- 6 Audio-Visual Copyright Society o/b/o Northway Productions PTY LTD
- 7 Audio-Visual Copyright Society o/b/o South Australian Film Corporation
- 8 Audio-Visual Copyright Society o/b/o Southern Star Sales Limited
- 9 CBS Broadcasting Inc. o/b/o King World Productions Inc.
- 10 Compact Collections Limited o/b/o Capitol Films LTD
- 11 Compact Collections Limited o/b/o Carlton International Media LTD
- 12 Compact Collections Limited o/b/o Cinequanon Pictures International
- 13 Compact Collections Limited o/b/o Euro London Films LTD
- 14 Compact Collections Limited o/b/o Fremantle Media Enterprises LTD
- 15 Compact Collections Limited o/b/o Granada Media Group LTD
- 16 Compact Collections Limited o/b/o Hit Entertainment PLC
- 17 Compact Collections Limited o/b/o IAC Films
- 18 Compact Collections Limited o/b/o Initial Entertainment Group
- 19 Compact Collections Limited o/b/o International Creative Exchange
- 20 Compact Collections Limited o/b/o Jaffe Braunstein Films LTD
- 21 Compact Collections Limited o/b/o Lifesize Entertainment and Releasing
- 22 Compact Collections Limited o/b/o Majestic Films
- 23 Compact Collections Limited o/b/o Monarch Film Inc.
- 24 Compact Collections Limited o/b/o Multi Media of Canada
- 25 Compact Collections Limited o/b/o Pacific Family Entertainment
- 26 Compact Collections Limited o/b/o Palace (Wicked Hardware) LTD

Claimants with whom MPAA has no agreement

- 27 Compact Collections Limited o/b/o Powersports Millenium Int'l
- 28 Compact Collections Limited o/b/o RDF Media.com LTD
- 29 Compact Collections Limited o/b/o Tapestry International LTD
- 30 Compact Collections Limited o/b/o Telescene Film Group Inc.
- 31 Compact Collections Limited o/b/o The Fremantle Corporation
- 32 Compact Collections Limited o/b/o Trans World Sport
- 33 Compact Collections Limited o/b/o TV Ontario
- 34 Compact Collections Limited o/b/o Zenith Productions LTD
- 35 Compact Collections Limited o/b/o Zia Film Distribution LLC
- 36 Fintage Publishing & Collection BV o/b/o Cinematografica Tabasco S.A.
- 37 Fintage Publishing & Collection BV o/b/o Egeda
- 38 Fintage Publishing & Collection BV o/b/o Endemol USA
- 39 Fintage Publishing & Collection BV o/b/o Nanitta Inversiones S.A.
- 40 Fintage Publishing & Collection BV o/b/o Panorama Films
- 41 Fintage Publishing & Collection BV o/b/o Polygram Iberica S.A.
- 42 Fintage Publishing & Collection BV o/b/o Producciones Carlos Amador
- 43 Fintage Publishing & Collection BV o/b/o Taurus 7 Film Productions
- 44 Fintage Publishing & Collection BV o/b/o Televicine
- 45 Fintage Publishing & Collection BV o/b/o Televisa
- 46 Fintage Publishing & Collection BV o/b/o Video Mercury Films S.A.
- 47 Fintage Publishing & Collection BV o/b/o Video Universal S.A. De C.V.
- 48 I.F.T.A. Collections o/b/o Alliance Atlantis Communications Inc.
- 49 I.F.T.A. Collections o/b/o Artisan Entertainment
- 50 I.F.T.A. Collections o/b/o Associated Television International
- 51 I.F.T.A. Collections o/b/o Bennett Productions Inc.
- 52 I.F.T.A. Collections o/b/o Big Bear Licensing Corporation Inc.
- 53 I.F.T.A. Collections o/b/o Carolco Pictures Inc.
- 54 I.F.T.A. Collections o/b/o Castle Hill Productions Inc.
- 55 I.F.T.A. Collections o/b/o Cinemavault Releasing
- 56 I.F.T.A. Collections o/b/o Cinetel Films Inc.
- 57 I.F.T.A. Collections o/b/o Cinevest Entertainment Group Inc.
- 58 I.F.T.A. Collections o/b/o Concorde New Horizons Corp.
- 59 I.F.T.A. Collections o/b/o Crystal Sky International
- 60 I.F.T.A. Collections o/b/o Curb Entertainment International Corp.
- 61 I.F.T.A. Collections o/b/o Echo Bridge (f/k/a PM Entertainment)
- 62 I.F.T.A. Collections o/b/o First Look Media
- 63 I.F.T.A. Collections o/b/o Full Moon Pictures
- 64 I.F.T.A. Collections o/b/o Image Organization Inc.
- 65 I.F.T.A. Collections o/b/o Liberty International Entertainment Inc.
- 66 I.F.T.A. Collections o/b/o Lions Gate Films International
- 67 I.F.T.A. Collections o/b/o Media 8 (f/k/a MDP Worldwide)
- 68 I.F.T.A. Collections o/b/o Miramax Film Corporation
- 69 I.F.T.A. Collections o/b/o Moonstone Entertainment Inc.

Claimants with whom MPAA has no agreement

- 70 I.F.T.A. Collections o/b/o Morgan Creek International Inc.
- 71 I.F.T.A. Collections o/b/o NU Image Inc.
- 72 I.F.T.A. Collections o/b/o Pandora Sarl
- 73 I.F.T.A. Collections o/b/o Promark Entertainment Group
- 74 I.F.T.A. Collections o/b/o Scanbox International Inc.
- 75 I.F.T.A. Collections o/b/o Showcase Entertainment Inc.
- 76 I.F.T.A. Collections o/b/o Summit Entertainment LP
- 77 I.F.T.A. Collections o/b/o The Lewis Horwitz Organization
- 78 I.F.T.A. Collections o/b/o Trimark Pictures Inc.
- 79 I.F.T.A. Collections o/b/o Troma Inc.
- 80 I.F.T.A. Collections o/b/o West Side Studios Inc.
- 81 I.F.T.A. Collections o/b/o Worldwide Film (f/k/a ECD Worldwide)
- 82 Linda Koci o/b/o FTM Productions
- 83 Linda Koci o/b/o Steve White Productions
- 84 Litchfield Entertainment Company Inc o/b/o Script to Screen Productions
- 85 Litchfield Entertainment Company Inc. o/b/o Jasinski TV
- 86 Paramount Pictures, A Viacom Company o/b/o Big Ticket Productions
- 87 Paramount Pictures, A Viacom Company o/b/o Spelling Television Inc.
- 88 Paramount Pictures, A Viacom Company o/b/o Worldvision Enterprises, Inc.
- 89 The Canadian Broadcasting Corp. o/b/o Carol Reyonlds Productions Inc.
- 90 The Canadian Broadcasting Corp. o/b/o Epitome (P.W.T.) Distribution Inc.
- 91 The Goodman Group LLC o/b/o Ackerman McQueen Inc.
- 92 The Goodman Group LLC o/b/o Amden Corporation
- 93 The Goodman Group LLC o/b/o American Marketing System Inc.
- 94 The Goodman Group LLC o/b/o Aussie Nads US Corp.
- 95 The Goodman Group LLC o/b/o Banjo Buddies Inc.
- 96 The Goodman Group LLC o/b/o Best Direct International Inc.
- 97 The Goodman Group LLC o/b/o Blue Stuff Inc.
- 98 The Goodman Group LLC o/b/o Buckhead Marketing & Distribution LLC.
- 99 The Goodman Group LLC o/b/o Celebrity Products Direct Inc.
- 100 The Goodman Group LLC o/b/o Cesso LLC.
- 101 The Goodman Group LLC o/b/o Cole Media Group
- 102 The Goodman Group LLC o/b/o Danmark Inc.
- 103 The Goodman Group LLC o/b/o Dental Whitening Corp of America
- 104 The Goodman Group LLC o/b/o Dermal Tone Inc.
- 105 The Goodman Group LLC o/b/o Direct Resource Management Inc.
- 106 The Goodman Group LLC o/b/o Fitness Quest Inc.
- 107 The Goodman Group LLC o/b/o Greatlife TV Inc.
- 108 The Goodman Group LLC o/b/o Greenstone and Co.
- 109 The Goodman Group LLC o/b/o GRSN Inc.
- 110 The Goodman Group LLC o/b/o Hair Club for Men Inc.
- 111 The Goodman Group LLC o/b/o HCG Inc.
- 112 The Goodman Group LLC o/b/o HSN Direct International LTD

Claimants with whom MPAA has no agreement

- 113 The Goodman Group LLC o/b/o Integrity Global Marketing
- 114 The Goodman Group LLC o/b/o Koolotron
- 115 The Goodman Group LLC o/b/o Lawman Armor Corp.
- 116 The Goodman Group LLC o/b/o Lenco Inc.
- 117 The Goodman Group LLC o/b/o LL&C Dealer Services LLC
- 118 The Goodman Group LLC o/b/o Lohan Media Inc.
- 119 The Goodman Group LLC o/b/o Maximum Coverage Media
- 120 The Goodman Group LLC o/b/o Media Group LLC.
- 121 The Goodman Group LLC o/b/o Media Power Inc.
- 122 The Goodman Group LLC o/b/o Merchant Media Inc.
- 123 The Goodman Group LLC o/b/o Nightingale-Conant
- 124 The Goodman Group LLC o/b/o One World Live Integrated
- 125 The Goodman Group LLC o/b/o Orange Glo Inc.
- 126 The Goodman Group LLC o/b/o Perkins Management Inc.
- 127 The Goodman Group LLC o/b/o Phillips DRTV LLC
- 128 The Goodman Group LLC o/b/o Popeil Inventions Inc.
- 129 The Goodman Group LLC o/b/o Reliant Interactive Media Inc.
- 130 The Goodman Group LLC o/b/o Renosky Lure Co.
- 131 The Goodman Group LLC o/b/o Respond 2 Corp.
- 132 The Goodman Group LLC o/b/o Restore4 Inc.
- 133 The Goodman Group LLC o/b/o Ronco Inventions LLC
- 134 The Goodman Group LLC o/b/o Roto Zip Tool Corp.
- 135 The Goodman Group LLC o/b/o Salton Inc.
- 136 The Goodman Group LLC o/b/o SAS
- 137 The Goodman Group LLC o/b/o Slymark Inc.
- 138 The Goodman Group LLC o/b/o Smart Inventions Inc.
- 139 The Goodman Group LLC o/b/o Solid Golf LLC.
- 140 The Goodman Group LLC o/b/o Specialty Merchandise Corp.
- 141 The Goodman Group LLC o/b/o Suntiger Inc.
- 142 The Goodman Group LLC o/b/o Synergy Worldwide Inc.
- 143 The Goodman Group LLC o/b/o Teach Me to Trade
- 144 The Goodman Group LLC o/b/o Thane International Inc.
- 145 The Goodman Group LLC o/b/o The Sharper Image
- 146 The Goodman Group LLC o/b/o Think Big, Incorporated
- 147 The Goodman Group LLC o/b/o Tilia Inc.
- 148 The Goodman Group LLC o/b/o Time-Life Inc.
- 149 The Goodman Group LLC o/b/o Transforming Cosmetics Inc.
- 150 The Goodman Group LLC o/b/o Tropical Beaches LLC.
- 151 The Goodman Group LLC o/b/o Tyee Euro RSCG
- 152 The Goodman Group LLC o/b/o Vitalbasics Inc.
- 153 The Goodman Group LLC o/b/o Warren Direct Inc.

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- 1 Agicoa o/b/o Dania Film SRL
- 2 Agicoa o/b/o Studio Canal Image
- 3 Agicoa o/b/o VIP Media RL
- 4 Audio Visual Copyright Society Limited o/b/o Australian Broadcasting Corp.
- 5 Audio Visual Copyright Society Limited o/b/o Australian Children's Foundation
- 6 Audio Visual Copyright Society Limited o/b/o Australian Film Commissoin
- 7 Audio Visual Copyright Society Limited o/b/o Northway Productions PTY LTD
- 8 Audio Visual Copyright Society Limited o/b/o Rive Gauche Interational TV
- 9 CBS Broadcasting Inc. o/b/o King World Productions Inc.
- 10 CBS Studios Inc., A CBS Company o/b/o Big Ticket Television Inc.
- 11 Compact Collections o/b/o Allied Film Productions LTD.
- 12 Compact Collections o/b/o Carlton International Media LTD.
- 13 Compact Collections o/b/o Channel Four Television LTD.
- 14 Compact Collections o/b/o Chrysalis Film & TV
- 15 Compact Collections o/b/o DTG Communications Inc.
- 16 Compact Collections o/b/o Eagle Rock Entertainment Limited
- 17 Compact Collections o/b/o Euro London Films LTD.
- 18 Compact Collections o/b/o Fermantle Media Enterprises LTD.
- 19 Compact Collections o/b/o Granada Media Group LTD.
- 20 Compact Collections o/b/o GRB Entertainment Inc.
- 21 Compact Collections o/b/o IAC Films
- 22 Compact Collections o/b/o Indigo Film & Television LTD.
- 23 Compact Collections o/b/o Initial Entertainment Group
- 24 Compact Collections o/b/o International Creative Exchange
- 25 Compact Collections o/b/o Jaffe Braunstein Films LTD.
- 26 Compact Collections o/b/o Kushner Locke Company
- 27 Compact Collections o/b/o Lifesize Entertainment and Releasing
- 28 Compact Collections o/b/o Pacific Family Entertainment
- 29 Compact Collections o/b/o Palace (Wicked Hardware) LTD.
- 30 Compact Collections o/b/o Park Entertainment LTD.
- 31 Compact Collections o/b/o Powersports Millenium International
- 32 Compact Collections o/b/o Regent Entertainment Partnership LLP
- 33 Compact Collections o/b/o Rigel Independent Distribution
- 34 Compact Collections o/b/o Silverline Pictures Inc.
- 35 Compact Collections o/b/o South Australian Film Corporation
- 36 Compact Collections o/b/o The Best Picture Show Company PTY LTD
- 37 Compact Collections o/b/o The Fremantle Corporation
- 38 Compact Collections o/b/o Trans World Sport
- 39 Compact Collections o/b/o TV Onatrio
- 40 Compact Collections o/b/o Zia Film Distribution LLC
- 41 Fintage Publishing & Collection BV o/b/o Alameda Films S.A.
- 42 Fintage Publishing & Collection BV o/b/o America Producciones S.A.

Claimants with whom MPAA has no agreement

- 43 Fintage Publishing & Collection BV o/b/o Antena 3 Television S.A.
- 44 Fintage Publishing & Collection BV o/b/o August Entertainment
- 45 Fintage Publishing & Collection BV o/b/o Cinematografica Calderon
- 46 Fintage Publishing & Collection BV o/b/o Cineproducciones
- 47 Fintage Publishing & Collection BV o/b/o Cinetai
- 48 Fintage Publishing & Collection BV o/b/o Cumbre Films S.A. De C.V.
- 49 Fintage Publishing & Collection BV re. Alameda Films S.L.
- 50 Fintage Publishing & Collection BV re. Aldebaran Films S.L.
- 51 Fintage Publishing & Collection BV re. Alianza Cinematografica
- 52 Fintage Publishing & Collection BV re. America Producciones S.A.
- 53 Fintage Publishing & Collection BV re. Antenna 3 Television S.A.
- 54 Fintage Publishing & Collection BV re. Atlantic Films
- 55 Fintage Publishing & Collection BV re. August Entertainment
- 56 Fintage Publishing & Collection BV re. B.R.B. International S.A.
- 57 Fintage Publishing & Collection BV re. Bell-Phillip/BRL Distribution Inc.
- 58 Fintage Publishing & Collection BV re. Beyond International
- 59 Fintage Publishing & Collection BV re. Cima Films S.A.
- 60 Fintage Publishing & Collection BV re. Cine Vision S.A.
- 61 Fintage Publishing & Collection BV re. Cinematograficas Rosario
- 62 Fintage Publishing & Collection BV re. Cineproducciones Internationales S.A.
- 63 Fintage Publishing & Collection BV re. Cumbre Films S.A. De C.V.
- 64 Fintage Publishing & Collection BV re. Diafragma Films
- 65 Fintage Publishing & Collection BV re. Egeda
- 66 Fintage Publishing & Collection BV re. Eli S.A.
- 67 Fintage Publishing & Collection BV re. Endemal USA
- 68 Fintage Publishing & Collection BV re. Endemol Italia S.A.
- 69 Fintage Publishing & Collection BV re. Estrella Films
- 70 Fintage Publishing & Collection BV re. Estudios Churbusco Azteca S.A.
- 71 Fintage Publishing & Collection BV re. F. Mier S.A.
- 72 Fintage Publishing & Collection BV re. Falcon Producciones S.A. De C.V.
- 73 Fintage Publishing & Collection BV re. Fiesta Film Inc.
- 74 Fintage Publishing & Collection BV re. Flashpoint
- 75 Fintage Publishing & Collection BV re. Goyri Lopez Asociados S.A.
- 76 Fintage Publishing & Collection BV re. Gregorio Walerstein
- 77 Fintage Publishing & Collection BV re. Grupo Imagen Producciones
- 78 Fintage Publishing & Collection BV re. Laser Amadeus Inc.
- 79 Fintage Publishing & Collection BV re. Luxivde
- 80 Fintage Publishing & Collection BV re. Metro Oro Producciones S.A. De C.V.
- 81 Fintage Publishing & Collection BV re. Mexciema Video de Mexico S.A.De C.V.
- 82 Fintage Publishing & Collection BV re. Mexcinema Corporaton
- 83 Fintage Publishing & Collection BV re. Mexinema Video Corp.
- 84 Fintage Publishing & Collection BV re. Miguel Angel Martinez Producciones
- 85 Fintage Publishing & Collection BV re. Nacional Cinematografica

Claimants with whom MPAA has no agreement

- 86 Fintage Publishing & Collection BV re. Nanitta Inversiones S.A.
- 87 Fintage Publishing & Collection BV re. New Vision de Mexico S.A. De C.V.
- 88 Fintage Publishing & Collection BV re. Pigeon Productions
- 89 Fintage Publishing & Collection BV re. Posa Films
- 90 Fintage Publishing & Collection BV re. Produccines Cinematograficas Uno LTDA.
- 91 Fintage Publishing & Collection BV re. Producciones Calubi S.A.
- 92 Fintage Publishing & Collection BV re. Producciones Cinematograficas S.A.
- 93 Fintage Publishing & Collection BV re. Producciones Potosi
- 94 Fintage Publishing & Collection BV re. Producciones Raul de Anda S.A. De C.V.
- 95 Fintage Publishing & Collection BV re. Producciones Universal
- 96 Fintage Publishing & Collection BV re. RAI Trade
- 97 Fintage Publishing & Collection BV re. Stone Stanley
- 98 Fintage Publishing & Collection BV re. Taurus 7 Film Productions
- 99 Fintage Publishing & Collection BV re. Telefe Canal
- 100 Fintage Publishing & Collection BV re. Televisa
- 101 Fintage Publishing & Collection BV re. TV Azteca
- 102 Fintage Publishing & Collection BV re. Venevision International
- 103 Fintage Publishing & Collection BV re. Video Mercury Films S.A.
- 104 Fintage Publishing & Collection BV re. Video Universal S.A. De C.V.
- 105 Ifta Collections o/b/o Alfred Haber
- 106 Ifta Collections o/b/o Alliance Atlantis Communications Inc.
- 107 Ifta Collections o/b/o Artisan Entertainment
- 108 Ifta Collections o/b/o Associated Television International
- 109 Ifta Collections o/b/o Bennett Productions Inc.
- 110 Ifta Collections o/b/o Big Bear Licensing
- 111 Ifta Collections o/b/o Carolco Pictures Inc.
- 112 Ifta Collections o/b/o Castle Hill Production Inc.
- 113 Ifta Collections o/b/o Cinemavault Releasing
- 114 Ifta Collections o/b/o Cinetel Films Inc.
- 115 Ifta Collections o/b/o Cinevest Entertainment Group Inc.
- 116 Ifta Collections o/b/o Company Television Limited
- 117 Ifta Collections o/b/o Concorde-New Horizons Corp.
- 118 Ifta Collections o/b/o Crystal Sky International
- 119 Ifta Collections o/b/o Curb Entertainment International Corp.
- 120 Ifta Collections o/b/o Distant Horizon LTD.
- 121 Ifta Collections o/b/o Echo Bridge Entertainment
- 122 Ifta Collections o/b/o Fireworks Pictures & Chaross Pictures LTD.
- 123 Ifta Collections o/b/o First Look Media
- 124 Ifta Collections o/b/o Full Moon Pictures
- 125 Ifta Collections o/b/o Goldcrest Films and Television LTD
- 126 Ifta Collections o/b/o Image Organization Inc.
- 127 Ifta Collections o/b/o Liberty International Entertainment Inc.
- 128 Ifta Collections o/b/o Lions Gate International

- 129 Ifta Collections o/b/o Media 8 Entertainment
- 130 Ifta Collections o/b/o Miramax Film Corporation
- 131 Ifta Collections o/b/o Moonstone Entertainment Inc.
- 132 Ifta Collections o/b/o Morgan Creek International Inc.
- 133 Ifta Collections o/b/o NU Image Inc.
- 134 Ifta Collections o/b/o Oasis International
- 135 Ifta Collections o/b/o Pandora Sarl
- 136 Ifta Collections o/b/o Paragon International
- 137 Ifta Collections o/b/o Promark Entertainment Group
- 138 Ifta Collections o/b/o Scanbox International Inc.
- 139 Ifta Collections o/b/o Showcase Entertainment Inc.
- 140 Ifta Collections o/b/o Summit Entertainment LP
- 141 Ifta Collections o/b/o The Lewis Horwitz Organization
- 142 Ifta Collections o/b/o Trident Releasing Inc.
- 143 Ifta Collections o/b/o Trimark Pictures Inc.
- 144 Ifta Collections o/b/o Vine International Pitures LTD.
- 145 Ifta Collections o/b/o West Side Studios Inc.
- 146 Ifta Collections o/b/o Worldwide Film Entertainment
- 147 Linda Koci o/b/o Spectacor Films
- 148 Linda Koci o/b/o Spectacor Films
- 149 Linda Koci o/b/o Steve White Films
- 150 Litchfield Entertainment Company Inc. o/b/o Jasinski TV
- 151 Litchfield Entertainment Company Inc. o/b/o Script to Screen Productions Inc.
- 152 NBC Universal Inc o/b/o Universal City Studios Productions LLLP
- 153 NBC Universal Inc. o/b/o CNBC Inc.
- 154 NBC Universal Inc. o/b/o NBC Enterprises Inc.
- 155 NBC Universal Inc. o/b/o Universal City Studios Productions LLLP
- 156 Sony Pictures Television Inc. o/b/o Califon Productions Inc.
- 157 Sony Pictures Television Inc. o/b/o Jeopardy Productions Inc.
- 158 The Canadian Broadcasting Corporation o/b/o Cine-Group Corporation
- 159 The Canadian Broadcasting Corporation o/b/o Cine-Group Corporation
- 160 The Canadian Broadcasting Corporation o/b/o Muse Entertainment Enterprises
- 161 The Goodman Group LLC o/b/o Amden Corporation
- 162 The Goodman Group LLC o/b/o Ann II Inc.
- 163 The Goodman Group LLC o/b/o Aussie Nads US Corp.
- 164 The Goodman Group LLC o/b/o Best Direct International Inc.
- 165 The Goodman Group LLC o/b/o Blitz Media Inc.
- 166 The Goodman Group LLC o/b/o Blue Stuff Inc.
- 167 The Goodman Group LLC o/b/o Body by Jake Enterprises LLC
- 168 The Goodman Group LLC o/b/o Buckhead Marketing & Distribution
- 169 The Goodman Group LLC o/b/o Celebrity Products Direct Inc.
- 170 The Goodman Group LLC o/b/o Cole Media Group
- 171 The Goodman Group LLC o/b/o Dental Whitening Corp. of America

Claimants with whom MPAA has no agreement

- 172 The Goodman Group LLC o/b/o Dermal Tone Inc.
- 173 The Goodman Group LLC o/b/o Emedia Music Corporation
- 174 The Goodman Group LLC o/b/o Fitness Quest Inc.
- 175 The Goodman Group LLC o/b/o Greatlife TV Inc.
- 176 The Goodman Group LLC o/b/o Greenstone and Co.
- 177 The Goodman Group LLC o/b/o GRSN Inc.
- 178 The Goodman Group LLC o/b/o Hair Club for Men Inc.
- 179 The Goodman Group LLC o/b/o HCG Inc.
- 180 The Goodman Group LLC o/b/o Infotopia Inc.
- 181 The Goodman Group LLC o/b/o Integrity Global Marketing
- 182 The Goodman Group LLC o/b/o Koolotron
- 183 The Goodman Group LLC o/b/o Lawman Armor Corp.
- 184 The Goodman Group LLC o/b/o Lenco Inc.
- 185 The Goodman Group LLC o/b/o LL&C Dealer Services LLC
- 186 The Goodman Group LLC o/b/o Lohan Media Inc.
- 187 The Goodman Group LLC o/b/o Media Group LLC
- 188 The Goodman Group LLC o/b/o Media Power Inc.
- 189 The Goodman Group LLC o/b/o Nightingale-Conant
- 190 The Goodman Group LLC o/b/o One World Live Integrated Technologies Inc.
- 191 The Goodman Group LLC o/b/o Orange Glo Inc.
- 192 The Goodman Group LLC o/b/o PAAWS LLC
- 193 The Goodman Group LLC o/b/o Pekins Management Inc.
- 194 The Goodman Group LLC o/b/o Phillips DRTV LLC
- 195 The Goodman Group LLC o/b/o Popeil Inventions Inc.
- 196 The Goodman Group LLC o/b/o QDirect Inc.
- 197 The Goodman Group LLC o/b/o Quick 'N Brite Inc.
- 198 The Goodman Group LLC o/b/o Reliant Interactive Media Inc.
- 199 The Goodman Group LLC o/b/o Respond 2 Corp.
- 200 The Goodman Group LLC o/b/o Retsore4 Inc.
- 201 The Goodman Group LLC o/b/o Ronco Inventions LLC
- 202 The Goodman Group LLC o/b/o Roto Zip Tool Corp.
- 203 The Goodman Group LLC o/b/o Salton Inc.
- 204 The Goodman Group LLC o/b/o SAS
- 205 The Goodman Group LLC o/b/o Shop America USA
- 206 The Goodman Group LLC o/b/o Slymark Inc.
- 207 The Goodman Group LLC o/b/o Smart Inventions Inc.
- 208 The Goodman Group LLC o/b/o Specialty Merchandise Corp.
- 209 The Goodman Group LLC o/b/o Teach Me to Trade
- 210 The Goodman Group LLC o/b/o Thane International Inc.
- 211 The Goodman Group LLC o/b/o The Sharper Image
- 212 The Goodman Group LLC o/b/o Think Big Incorporated
- 213 The Goodman Group LLC o/b/o Tilia Inc.
- 214 The Goodman Group LLC o/b/o Time-Life Inc.

- 215 The Goodman Group LLC o/b/o Tony Hoffman Productions Inc.
- 216 The Goodman Group LLC o/b/o Transforming Cosmetics Inc.
- 217 The Goodman Group LLC o/b/o Tropical Beaches LLC
- 218 The Goodman Group LLC o/b/o Tyee Euro RSCG
- 219 The Goodman Group LLC o/b/o United Fitness of America LLC
- 220 The Goodman Group LLC o/b/o Vitalbasics Inc.
- 221 The Program Exchange o/b/o General Mills Sales Inc.

2003

- 1 Agicoa o/b/o Metropolis Film Production GMBH & Co. KG
- 2 Agicoa o/b/o Rosco Film GMBH
- 3 AVCS o/b/o Australian Broadcasting Corporation
- 4 AVCS o/b/o Banksia Productions PTY LTD
- 5 AVCS o/b/o Barron Entertainment LTD
- 6 AVCS o/b/o Better Grades Seminars LLC
- 7 AVCS o/b/o Screen Ventures LTD
- 8 AVCS o/b/o Tom Parkinson
- 9 Carsey Werner Distribution (o/b/o Carsey-Werner-Mandabach LLC)
- 10 CBS Studios Inc., A CBS Company o/b/o Spelling Television Inc.
- 11 CBS Studios Inc., A CBS Company o/b/o Worldvision Enterprises Inc.
- 12 CBS Broadcasting Inc. o/b/o King World Productions Inc.
- 13 CBS Studios Inc., A CBS Company o/b/o Big Ticket Television Inc.
- 14 Compact Collections Limited o/b/o 1st Miracle Productions Inc.
- 15 Compact Collections Limited o/b/o Australian Children's TV Foundation
- 16 Compact Collections Limited o/b/o Burbank Animation Studios PTY LTD
- 17 Compact Collections Limited o/b/o Capitol Films LTD
- 18 Compact Collections Limited o/b/o Carlton America
- 19 Compact Collections Limited o/b/o Carlton International
- 20 Compact Collections Limited o/b/o Channel Four Television LTD
- 21 Compact Collections Limited o/b/o Channels International
- 22 Compact Collections Limited o/b/o Cinequanon Pictures International Inc.
- 23 Compact Collections Limited o/b/o Equator Films LTD
- 24 Compact Collections Limited o/b/o Euro London Films LTD
- 25 Compact Collections Limited o/b/o Icon Entertainment
- 26 Compact Collections Limited o/b/o Indigo Film & Television LTD
- 27 Compact Collections Limited o/b/o Initial Entertainment Group
- 28 Compact Collections Limited o/b/o Kushner Locke Company
- 29 Compact Collections Limited o/b/o Marvista Entertainment
- 30 Compact Collections Limited o/b/o Pacific Family Entertainment
- 31 Compact Collections Limited o/b/o Park Entertainment LTD
- 32 Compact Collections Limited o/b/o Porchlight Entertainment Inc.
- 33 Compact Collections Limited o/b/o Powersports Millenium Int'l
- 34 Compact Collections Limited o/b/o Quantum Entertainment Inc.

- 35 Compact Collections Limited o/b/o Rigel Independent Distribution
- 36 Compact Collections Limited o/b/o Silverline Pictures Inc.
- 37 Compact Collections Limited o/b/o The Best Picture Show Company PTY LTD
- 38 Compact Collections Limited o/b/o The Fremantle Corporation
- 39 Compact Collections Limited o/b/o Zia
- 40 Egeda o/b/o Cromosoma SA
- 41 Egeda o/b/o Jose Maria Lara Producciones Cinematograficas
- 42 Fintage Publishing & Collection B.V. re. August Entertainment
- 43 Fintage Publishing & Collection B.V. re. Bell Phillip BBL Distribution Inc.
- 44 Fintage Publishing & Collection B.V. re. Beyond International
- 45 Fintage Publishing & Collection B.V. re. Endemol USA
- 46 Fintage Publishing & Collection B.V. re. Flashpoint LTD.
- 47 Fintage Publishing & Collection B.V. re. Greenlight Media AG
- 48 Fintage Publishing & Collection B.V. re. Intermedia Film Distribution Inc.
- 49 Fintage Publishing & Collection B.V. re. Largo Entertainment International
- 50 Fintage Publishing & Collection B.V. re. Luxvide S.P.A.
- 51 Fintage Publishing & Collection B.V. re. RAI Trade
- 52 Fintage Publishing & Collection B.V. re. Shogakukan Prduction Co. LTD.
- 53 Fintage Publishing & Collection B.V. re. Taurus 7 Film Productions
- 54 Fintage Publishing & Collection B.V. re. Televisa
- 55 Fintage Publishing & Collection B.V. re. TV-Azteca
- 56 Fintage Publishing & Collection B.V. re. TV-Loonland AG
- 57 IFTA Collections o/b/o Alliance Atlantis Communications Inc.
- 58 IFTA Collections o/b/o Artisan Entertainment
- 59 IFTA Collections o/b/o Associated Television International
- 60 IFTA Collections o/b/o Bennett Productions Inc.
- 61 IFTA Collections o/b/o Capella International Inc.
- 62 IFTA Collections o/b/o Carolco Pictures Inc.
- 63 IFTA Collections o/b/o Castle Hill Productions Inc.
- 64 IFTA Collections o/b/o Concorde-New Horizons Corp.
- 65 IFTA Collections o/b/o Curb Entertainment International Corp.
- 66 IFTA Collections o/b/o Echo Bridge Entertainment LLC
- 67 IFTA Collections o/b/o Fireworks Pictures & Chaross Pictures LTD
- 68 IFTA Collections o/b/o First Look Media
- 69 IFTA Collections o/b/o Full Moon Pictures
- 70 IFTA Collections o/b/o Image Organization Inc.
- 71 IFTA Collections o/b/o Liberty Interational Entertainment Inc.
- 72 IFTA Collections o/b/o Lions Gate Films Intertnational
- 73 IFTA Collections o/b/o Media 8 Entertainment
- 74 IFTA Collections o/b/o Moonstone Entertainment Inc.
- 75 IFTA Collections o/b/o Morgan Creek International
- 76 IFTA Collections o/b/o NU Image Inc.
- 77 IFTA Collections o/b/o Scanbox International Inc.

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- 73 IFTA Collections o/b/o Media 8 Entertainment
- 74 IFTA Collections o/b/o Moonstone Entertainment Inc.
- 75 IFTA Collections o/b/o Morgan Creek International
- 76 IFTA Collections o/b/o NU Image Inc.
- 77 IFTA Collections o/b/o Scanbox International Inc.

Claimants with whom MPAA has no agreement

- 78 IFTA Collections o/b/o Showcase Entertainment Inc.
- 79 IFTA Collections o/b/o Trident Releasing Inc.
- 80 IFTA Collections o/b/o Trimark Pictures Inc.
- 81 IFTA Collections o/b/o Vine International Pictures LTD
- 82 IFTA Collections o/b/o West Side Studios Inc.
- 83 IFTA Collections o/b/o World International Network LLC
- 84 IFTA Collections o/b/o Worldwide Film Entertainment
- 85 Linda Koci o/b/o Jaffe Braunstein Films LTD
- 86 Linda Koci o/b/o Michael Jaffe Films LTD
- 87 Linda Koci o/b/o Spectacor Films
- 88 Linda Koci o/b/o Steve White Films
- 89 Ole Media Management (o/b/o Nelvana Limited)
- 90 Paramount Pictures, A Viacom Company o/b/o Dreamworks LLC
- 91 Sony Pictures Television o/b/o Califon Productions Inc.
- 92 Sony Pictures Television o/b/o Jeopardy Productions Inc.
- 93 The Goodman Group LLC o/b/o Amden Corporation
- 94 The Goodman Group LLC o/b/o Ann II Inc.
- 95 The Goodman Group LLC o/b/o Blue Stuff Inc.
- 96 The Goodman Group LLC o/b/o Body by Jake Enterprises LLC
- 97 The Goodman Group LLC o/b/o Buckhead Marketing & Distribution LLC.
- 98 The Goodman Group LLC o/b/o Celebrity Products Direct Inc.
- 99 The Goodman Group LLC o/b/o Dental Whitening Corp.
- 100 The Goodman Group LLC o/b/o Fitness Quest Inc.
- 101 The Goodman Group LLC o/b/o Greenstone and Co.
- 102 The Goodman Group LLC o/b/o GRSN Inc.
- 103 The Goodman Group LLC o/b/o Hair Club for Men Inc.
- 104 The Goodman Group LLC o/b/o HCG Inc.
- 105 The Goodman Group LLC o/b/o Infotopia Inc.
- 106 The Goodman Group LLC o/b/o Integrity Global Marketing
- 107 The Goodman Group LLC o/b/o Koolotron
- 108 The Goodman Group LLC o/b/o Lawman Armor Corp.
- 109 The Goodman Group LLC o/b/o Lenco Inc.
- 110 The Goodman Group LLC o/b/o LL&C Dealer Services LLC.
- 111 The Goodman Group LLC o/b/o Lohan Media Inc.
- 112 The Goodman Group LLC o/b/o Media Group LLC.
- 113 The Goodman Group LLC o/b/o Media Power Inc.
- 114 The Goodman Group LLC o/b/o Nightingale-Conant
- 115 The Goodman Group LLC o/b/o One World Live Integrated Technologies Inc.
- 116 The Goodman Group LLC o/b/o Orange Glo Inc.
- 117 The Goodman Group LLC o/b/o PAAWS LLC.
- 118 The Goodman Group LLC o/b/o Popeil Inventions
- 119 The Goodman Group LLC o/b/o Quick 'N Brite
- 120 The Goodman Group LLC o/b/o Reliant Interactive Media, Inc.

Claimants with whom MPAA has no agreement

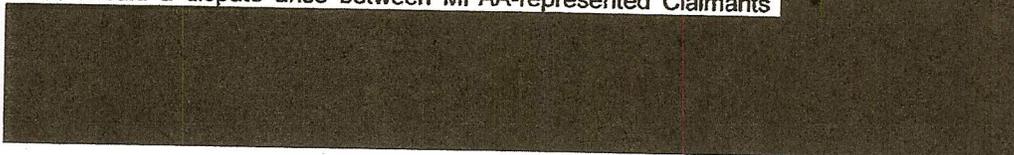
- 121 The Goodman Group LLC o/b/o Respond 2 Corp.
- 122 The Goodman Group LLC o/b/o Restore4 Inc.
- 123 The Goodman Group LLC o/b/o Ronco Inventions LLC.
- 124 The Goodman Group LLC o/b/o Roto Zip Tool Corp.
- 125 The Goodman Group LLC o/b/o Salton Inc.
- 126 The Goodman Group LLC o/b/o SAS
- 127 The Goodman Group LLC o/b/o SAVVIER Inc.
- 128 The Goodman Group LLC o/b/o Shop America USA
- 129 The Goodman Group LLC o/b/o Slymark Inc.
- 130 The Goodman Group LLC o/b/o Specialty Merchandise Corp.
- 131 The Goodman Group LLC o/b/o Suntiger Inc.
- 132 The Goodman Group LLC o/b/o Teach Me to Trade
- 133 The Goodman Group LLC o/b/o Thane International Inc.
- 134 The Goodman Group LLC o/b/o The Sharper Image
- 135 The Goodman Group LLC o/b/o Think Big, Incorporated
- 136 The Goodman Group LLC o/b/o Tilia Inc.
- 137 The Goodman Group LLC o/b/o Time Life Inc.
- 138 The Goodman Group LLC o/b/o Transforming Cosmetics Inc.
- 139 The Goodman Group LLC o/b/o Tropical Beaches LLC.
- 140 The Goodman Group LLC o/b/o Tyee Euro RSCG
- 141 The Goodman Group LLC o/b/o Vitalbasics Inc.
- 142 The Program Exchange o/b/o General Mills Sales Inc.

EXHIBIT 15

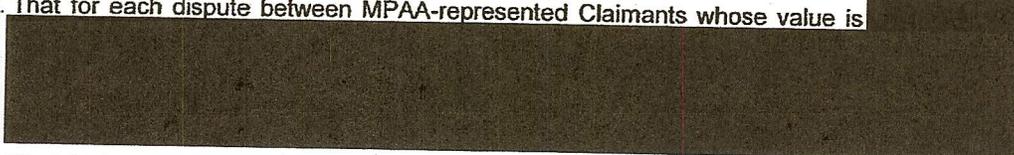
**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

Representation Agreement
Cable Statutory License Retransmission Royalties
Page 2 of 2

11. That should a dispute arise between MPAA-represented Claimants



12. That for each dispute between MPAA-represented Claimants whose value is



13. That Claimant's claims are subject to verification by MPAA;
14. To provide MPAA, upon request, documentation sufficient to confirm Claimant's rights in a title for which Claimant has submitted a claim;
15. That MPAA shall have the right to determine the sufficiency of any such rights documentation and that MPAA may refuse to approve any claim for which MPAA determines in its sole discretion that rights have not been adequately established by the Claimant;
16. That if Claimant has submitted a joint claim for royalties, this agreement shall authorize MPAA to represent all joint Claimants that are parties to the joint claim submitted by Claimant;
17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and
18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the Copyright Office has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: AFMA COLLECTIONS, A DIVISION OF
AFMA

By: 

(Typed/printed name) Paula T. Hapaugh

Title: manager

Date signed: 09/24/2002

Accepted & Agreed by MPAA:

By: 

Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: Sept. 24, 2002

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

**REPRESENTATION AGREEMENT FOR
STATUTORY LICENSE RETRANSMISSION ROYALTIES - CABLE**

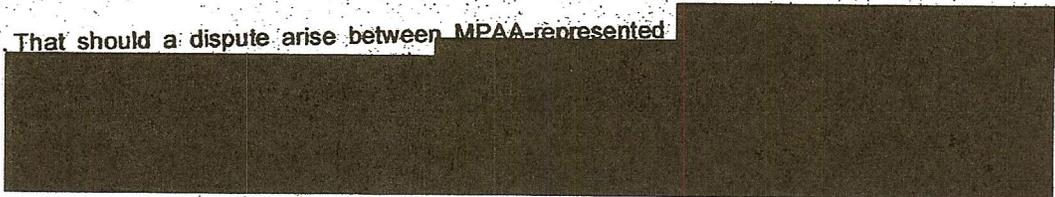
In consideration for the representation of its claim for cable statutory license retransmission royalties (Royalties), including before the Copyright Office, the Copyright Arbitration Royalty Panel (CARP) and any court with jurisdiction to review a decision of a CARP, the Copyright Office or Library of Congress, and the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

1. That to be entitled to the Royalties for any particular year, Claimant must timely file a claim for such royalties with the Copyright Office;
2. To authorize Motion Picture Association of America (MPAA) as its sole representative as a Program Supplier claimant before the Copyright Office and any CARP convened for the allocation of the Royalties;
3. To accept the distribution methodology [REDACTED]
4. [REDACTED]
5. To provide MPAA with a true and complete written statement of titles for which the undersigned asserts a claim as the owner or the duly authorized agent of the owner;
6. To advise MPAA by a date to be specified of any titles that may have been erroneously attributed to Claimant, i.e. programs with respect to which Claimant was neither the copyright owner nor the authorized agent of the copyright owner during the royalty year in question and further to accept payment only for programs correctly attributed to the undersigned Claimant;
7. That the MPAA Copyright Royalty Distribution Office is authorized to establish such structure and operating policies and procedures as it deems appropriate to accomplish its purpose of the accurate distribution and disbursement of funds received from the Copyright Office;
8. [REDACTED]
9. To have deducted from its share, as determined in Paragraph 3, [REDACTED]
10. [REDACTED]

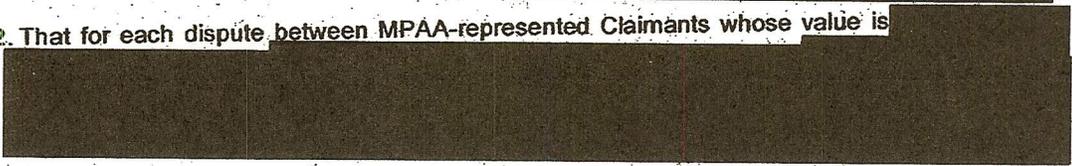
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Representation Agreement
Cable Statutory License Retransmission Royalties
Page 2 of 2

11. That should a dispute arise between MPAA-represented



12. That for each dispute between MPAA-represented Claimants whose value is



13. That Claimant's claims are subject to verification by MPAA;

14. To provide MPAA, upon request, documentation sufficient to confirm Claimant's rights in a title for which Claimant has submitted a claim;

15. That MPAA shall have the right to determine the sufficiency of any such rights documentation and that MPAA may refuse to approve any claim for which MPAA determines in its sole discretion that rights have not been adequately established by the Claimant;

16. That if Claimant has submitted a joint claim for royalties, this agreement shall authorize MPAA to represent all joint Claimants that are parties to the joint claim submitted by Claimant;

17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and

18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the Copyright Office has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: AGICOA

By: W. Koszuszek

(Typed/printed name) WELMUT KOZUSZEK

Title: Legal and Business Director

Date signed: August 04, 2004

Accepted & Agreed by MPAA:

By: Marsha E. Kessler
Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: August 10, 2004

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

**REPRESENTATION AGREEMENT FOR
STATUTORY LICENSE RETRANSMISSION ROYALTIES - CABLE**

In consideration for the representation of its claim for cable statutory license retransmission royalties (Royalties), including before the Copyright Office, the Copyright Arbitration Royalty Panel (CARP) and any court with jurisdiction to review a decision of a CARP, the Copyright Office or Library of Congress, and the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

1. That to be entitled to the Royalties for any particular year, Claimant must timely file a claim for such royalties with the Copyright Office;
2. To authorize Motion Picture Association of America (MPAA) as its sole representative as a Program Supplier claimant before the Copyright Office and any CARP convened for the allocation of the Royalties;
3. To accept the distribution methodology [REDACTED]
4. [REDACTED]
5. To provide MPAA with a true and complete written statement of titles for which the undersigned asserts a claim as the owner or the duly authorized agent of the owner;
6. To advise MPAA by a date to be specified of any titles that may have been erroneously attributed to Claimant, i.e. programs with respect to which Claimant was neither the copyright owner nor the authorized agent of the copyright owner during the royalty year in question and further to accept payment only for programs correctly attributed to the undersigned Claimant;
7. That the MPAA Copyright Royalty Distribution Office is authorized to establish such structure and operating policies and procedures as it deems appropriate to accomplish its purpose of the accurate distribution and disbursement of funds received from the Copyright Office;
8. [REDACTED]
9. To have deducted from its share, as determined in Paragraph 3, [REDACTED]
10. [REDACTED]

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

Representation Agreement
Cable Statutory License Retransmission Royalties
Page 2 of 2

11. That should a dispute arise between MPAA-represented Claimants [REDACTED]
[REDACTED]
12. That for each dispute between MPAA-represented Claimants whose value is [REDACTED]
[REDACTED]
13. That Claimant's claims are subject to verification by MPAA;
14. To provide MPAA, upon request, documentation sufficient to confirm Claimant's rights in a title for which Claimant has submitted a claim;
15. That MPAA shall have the right to determine the sufficiency of any such rights documentation and that MPAA may refuse to approve any claim for which MPAA determines in its sole discretion that rights have not been adequately established by the Claimant;
16. That if Claimant has submitted a joint claim for royalties, this agreement shall authorize MPAA to represent all joint Claimants that are parties to the joint claim submitted by Claimant;
17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and
18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the Copyright Office has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: AGICOA URHEBERRECHTSSCHUTZ GMBH

By: [Signature]

(Typed/printed name) G. Müller-Ernstberger

Title: _____

Date signed: August 10, 2004

Accepted & Agreed by MPAA:

By: [Signature]

Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: August 16, 2004

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

**REPRESENTATION AGREEMENT FOR
STATUTORY LICENSE RETRANSMISSION ROYALTIES - CABLE**

In consideration for the representation of its claim for cable statutory license retransmission royalties (Royalties), including before the Copyright Office, the Copyright Arbitration Royalty Panel (CARP) and any court with jurisdiction to review a decision of a CARP, the Copyright Office or Library of Congress, and the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

1. That to be entitled to the Royalties for any particular year, Claimant must timely file a claim for such royalties with the Copyright Office;
2. To authorize Motion Picture Association of America (MPAA) as its sole representative as a Program Supplier claimant before the Copyright Office and any CARP convened for the allocation of the Royalties;
3. To accept the distribution methodology [REDACTED]
4. [REDACTED]
5. To provide MPAA with a true and complete written statement of titles for which the undersigned asserts a claim as the owner or the duly authorized agent of the owner;
6. To advise MPAA by a date to be specified of any titles that may have been erroneously attributed to Claimant, i.e. programs with respect to which Claimant was neither the copyright owner nor the authorized agent of the copyright owner during the royalty year in question and further to accept payment only for programs correctly attributed to the undersigned Claimant;
7. That the MPAA Copyright Royalty Distribution Office is authorized to establish such structure and operating policies and procedures as it deems appropriate to accomplish its purpose of the accurate distribution and disbursement of funds received from the Copyright Office;
8. [REDACTED]
9. To have deducted from its share, as determined in Paragraph 3, [REDACTED]
10. [REDACTED]

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

Representation Agreement
Cable Statutory License Retransmission Royalties
Page 2 of 2

11. That should a dispute arise between MPAA-represented Claimants 

12. That for each dispute between MPAA-represented Claimants whose value is 

13. That Claimant's claims are subject to verification by MPAA;

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15. That MPAA shall have the right to determine the sufficiency of any such rights documentation and that MPAA may refuse to approve any claim for which MPAA determines in its sole discretion that rights have not been adequately established by the Claimant;

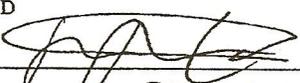
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17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and

18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the Copyright Office has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: THE AUDIO-VISUAL COPYRIGHT SOCIETY
LIMITED

By: 

(Typed/printed name) Simon Lake

Title: Chief Executive Officer

Date signed: 18/9/02

Accepted & Agreed by MPAA:

By: 

Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: 9-25-2002

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

**REPRESENTATION AGREEMENT FOR
STATUTORY LICENSE RETRANSMISSION ROYALTIES - CABLE**

In consideration for the representation of its claim for cable statutory license retransmission royalties (Royalties), including before the Copyright Office, the Copyright Arbitration Royalty Panel (CARP) and any court with jurisdiction to review a decision of a CARP, the Copyright Office or Library of Congress, and the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

1. That to be entitled to the Royalties for any particular year, Claimant must timely file a claim for such royalties with the Copyright Office;
2. To authorize Motion Picture Association of America (MPAA) as its sole representative as a Program Supplier claimant before the Copyright Office and any CARP convened for the allocation of the Royalties;
3. To accept the distribution methodology 
4. 
5. To provide MPAA with a true and complete written statement of titles for which the undersigned asserts a claim as the owner or the duly authorized agent of the owner;
6. To advise MPAA by a date to be specified of any titles that may have been erroneously attributed to Claimant, i.e. programs with respect to which Claimant was neither the copyright owner nor the authorized agent of the copyright owner during the royalty year in question and further to accept payment only for programs correctly attributed to the undersigned Claimant;
7. That the MPAA Copyright Royalty Distribution Office is authorized to establish such structure and operating policies and procedures as it deems appropriate to accomplish its purpose of the accurate distribution and disbursement of funds received from the Copyright Office;
8. 
9. To have deducted from its share, as determined in Paragraph 3, 
10. 

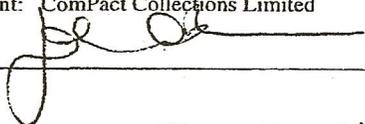
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Representation Agreement
Cable Statutory License Retransmission Royalties
Page 2 of 2

11. That should a dispute arise between MPAA-represented Claimants 
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13. That Claimant's claims are subject to verification by MPAA;
14. To provide MPAA, upon request, documentation sufficient to confirm Claimant's rights in a title for which Claimant has submitted a claim;
15. That MPAA shall have the right to determine the sufficiency of any such rights documentation and that MPAA may refuse to approve any claim for which MPAA determines in its sole discretion that rights have not been adequately established by the Claimant;
16. That if Claimant has submitted a joint claim for royalties, this agreement shall authorize MPAA to represent all joint Claimants that are parties to the joint claim submitted by Claimant;
17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and
18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the Copyright Office has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: ComPact Collections Limited

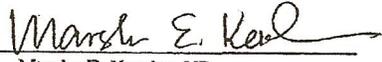
By: 

(Typed/printed name) JOHN O'SULLIVAN

Title: GENERAL MANAGER

Date signed: 7-5-03

Accepted & Agreed by MPAA:

By: 

Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: July 8, 2003

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

**REPRESENTATION AGREEMENT
U.S. CABLE RETRANSMISSION ROYALTIES**

In consideration for the representation of its claim for US cable retransmission royalties (Royalties), including before the Copyright Office, the Copyright Royalty Board (CPB) and any court with jurisdiction to review a CRB decision, and for the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

1. That to be entitled to the Royalties for any particular year, Claimant must timely file a claim for such royalties with the CRB;
2. To authorize Motion Picture Association of America (MPAA) as its sole representative as a Program Supplier claimant before the Copyright Office and any CRB convened for the allocation of the Royalties;
3. To accept the distribution methodology [REDACTED]
4. [REDACTED]
5. To provide MPAA with a true and complete written statement of titles for which the undersigned asserts a claim as the owner or the duly authorized agent of the owner;
6. To advise MPAA by a date to be specified of any titles that have been erroneously attributed to Claimant, i.e. programs with respect to which Claimant was neither the copyright owner nor the authorized agent of the copyright owner during the royalty year in question and further to accept payment only for programs correctly attributed to the undersigned Claimant;
7. That the MPAA Copyright Royalty Distribution Office is authorized to establish such structure and operating policies and procedures as it deems appropriate to accomplish its purpose of the accurate distribution and disbursement of funds received from the Copyright Office;
8. [REDACTED]
9. To have deducted from its share, as determined in Paragraph 3, [REDACTED]
10. [REDACTED]

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

Representation Agreement
U.S. Cable Retransmission Royalties
Page 2 of 2

11. That should a dispute arise between MPAA-represented Claimants 
12. That for each dispute between MPAA-represented Claimants whose value is 
13. That Claimant's claims are subject to verification by MPAA;
14. To provide MPAA, upon request, documentation sufficient to confirm Claimant's rights in a title for which Claimant has submitted a claim;
15. That MPAA shall have the right to determine the sufficiency of any such rights documentation and that MPAA may refuse to approve any claim for which MPAA determines in its sole discretion that rights have not been adequately established by the Claimant;
16. That if Claimant has submitted a joint claim for royalties, this agreement shall authorize MPAA to represent all joint Claimants that are parties to the joint claim submitted by Claimant;
17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and
18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the CRB has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: EGEDA 

By: _____

(Typed/printed name) FIGUER ANGELO BENTON

Title: GENERAL MANAGER

Date signed: _____

Accepted & Agreed by MPAA:

By: Marsha E. Kessler
Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: 2 November 2006

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

Jentige

**REPRESENTATION AGREEMENT FOR
STATUTORY LICENSE RETRANSMISSION ROYALTIES - CABLE**

In consideration for the representation of its claim for cable statutory license retransmission royalties (Royalties), including before the Copyright Office, the Copyright Arbitration Royalty Panel (CARP) and any court with jurisdiction to review a decision of a CARP, the Copyright Office or Library of Congress, and the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

1. That to be entitled to the Royalties for any particular year, Claimant must timely file a claim for such royalties with the Copyright Office;
2. To authorize Motion Picture Association of America (MPAA) as its sole representative as a Program Supplier claimant before the Copyright Office and any CARP convened for the allocation of the Royalties;
3. To accept the distribution methodology [REDACTED]
4. [REDACTED]
5. To provide MPAA with a true and complete written statement of titles for which the undersigned asserts a claim as the owner or the duly authorized agent of the owner;
6. To advise MPAA by a date to be specified of any titles that may have been erroneously attributed to Claimant, i.e. programs with respect to which Claimant was neither the copyright owner nor the authorized agent of the copyright owner during the royalty year in question and further to accept payment only for programs correctly attributed to the undersigned Claimant;
7. That the MPAA Copyright Royalty Distribution Office is authorized to establish such structure and operating policies and procedures as it deems appropriate to accomplish its purpose of the accurate distribution and disbursement of funds received from the Copyright Office;
8. [REDACTED]
9. To have deducted from its share, as determined in Paragraph 3, [REDACTED]
10. [REDACTED]

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

Jentige

**REPRESENTATION AGREEMENT FOR
STATUTORY LICENSE RETRANSMISSION ROYALTIES - CABLE**

In consideration for the representation of its claim for cable statutory license retransmission royalties (Royalties), including before the Copyright Office, the Copyright Arbitration Royalty Panel (CARP) and any court with jurisdiction to review a decision of a CARP, the Copyright Office or Library of Congress, and the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

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8. [REDACTED]
9. To have deducted from its share, as determined in Paragraph 3, [REDACTED]
10. [REDACTED]

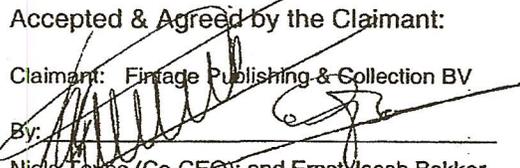
**RESTRICTED - Subject to
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2008-2 CRB CD 2000-2003 (Phase II)**

Representation Agreement
Cable Statutory License Retransmission Royalties
Page 2 of 2

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16. That if Claimant has submitted a joint claim for royalties, this agreement shall authorize MPAA to represent all joint Claimants that are parties to the joint claim submitted by Claimant;
17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and
18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the Copyright Office has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: Fintage Publishing & Collection BV

By: 
Niels Teves (Co-CEO); and Ernst Jacob Bakker
(VP Music & Secondary Rights)

Date signed: October 21, 2003

Accepted & Agreed by MPAA:

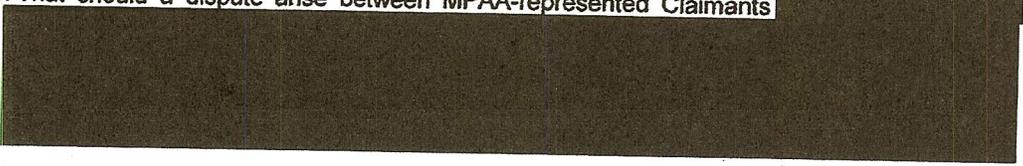
By: Marsha E. Kessler
Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: Oct. 28, 2003

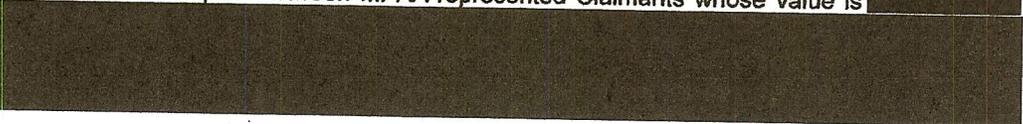
**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

Representation Agreement
Cable Statutory License Retransmission Royalties
Page 2 of 2

11. That should a dispute arise between MPAA-represented Claimants



12. That for each dispute between MPAA-represented Claimants whose value is



- 13. That Claimant's claims are subject to verification by MPAA;
- 14. To provide MPAA, upon request, documentation sufficient to confirm Claimant's rights in a title for which Claimant has submitted a claim;
- 15. That MPAA shall have the right to determine the sufficiency of any such rights documentation and that MPAA may refuse to approve any claim for which MPAA determines in its sole discretion that rights have not been adequately established by the Claimant;
- 16. That if Claimant has submitted a joint claim for royalties, this agreement shall authorize MPAA to represent all joint Claimants that are parties to the joint claim submitted by Claimant;
- 17. That Claimant is the duly authorized representative of all joint Claimants that are parties to the joint claim submitted by Claimant and is authorized by all such joint Claimants to execute this agreement on their behalf and to bind them to the provisions, terms, and conditions of this agreement; and
- 18. That this Agreement exists in perpetuity; however, either Claimant or MPAA may terminate this Agreement upon the expiration of a written 30-day advance notice. Such termination shall apply only to MPAA representation for those royalty years for which the Copyright Office has not yet docketed a Phase I distribution proceeding.

Accepted & Agreed by the Claimant:

Claimant: The Goodman Group LLC

By: [Signature]

(Typed/printed name) Blair A. Goodman

Title: CEO

Date signed: 6/26/04

Accepted & Agreed by MPAA:

By: [Signature]

Marsha E. Kessler, VP
Retransmission Royalty Distribution

Date signed: July 8, 2004

**RESTRICTED - Subject to
Protective Order in
2008-2 CRB CD 2000-2003 (Phase II)**

**REPRESENTATION AGREEMENT FOR
STATUTORY LICENSE RETRANSMISSION ROYALTIES - CABLE**

In consideration for the representation of its claim for cable statutory license retransmission royalties (Royalties), including before the Copyright Office, the Copyright Arbitration Royalty Panel (CARP) and any court with jurisdiction to review a decision of a CARP, the Copyright Office or Library of Congress, and the administrative processing of the Royalties allocated to MPAA-represented Program Supplier claimants under 17 USC §111(d)(4)(A), the undersigned (Claimant) hereby agrees as follows:

1. That to be entitled to the Royalties for any particular year, Claimant must timely file a claim for such royalties with the Copyright Office;
2. To authorize Motion Picture Association of America (MPAA) as its sole representative as a Program Supplier claimant before the Copyright Office and any CARP convened for the allocation of the Royalties;
3. To accept the distribution methodology [REDACTED]
4. [REDACTED]
5. To provide MPAA with a true and complete written statement of titles for which the undersigned asserts a claim as the owner or the duly authorized agent of the owner;
6. To advise MPAA by a date to be specified of any titles that may have been erroneously attributed to Claimant, i.e. programs with respect to which Claimant was neither the copyright owner nor the authorized agent of the copyright owner during the royalty year in question and further to accept payment only for programs correctly attributed to the undersigned Claimant;
7. That the MPAA Copyright Royalty Distribution Office is authorized to establish such structure and operating policies and procedures as it deems appropriate to accomplish its purpose of the accurate distribution and disbursement of funds received from the Copyright Office;
8. [REDACTED]
9. To have deducted from its share, as determined in Paragraph 3, [REDACTED]
10. [REDACTED]

MPAA-RP-05221

EXHIBIT 16

rulings on close or disputed questions about particular programs, the Tribunal refined the category definitions through declaratory rulings and rulings published as part of its final determinations. See, e.g., 1984 Cable Royalty Distribution Proceeding, 52 Fed. Reg. 8408, 8416 (Mar. 17, 1987); Advisory Opinion, Docket No. CRT 85-4 84 CD (May 16, 1986). For the 1990-1992 proceeding, the parties stipulate that the following Phase I category definitions, based on these prior Tribunal rulings, should apply:

Phase I Program Category Definitions

"Program Suppliers." Syndicated series, specials and movies, other than Devotional Claimants programs as defined below. Syndicated series and specials are defined as including (1) programs licensed to and broadcast by at least one U.S. commercial television station during the calendar year in question, (2) programs produced by or for a broadcast station that are broadcast by two or more U.S. television stations during the calendar year in question, and (3) programs produced by or for a U.S. commercial television station that are comprised predominantly of syndicated elements, such as music video shows, cartoon shows, "PM Magazine," and locally hosted movie shows.

"Joint Sports." Live telecasts of professional and college team sports broadcast by U.S. and Canadian television stations, except for programs coming within the Canadian Claimants category as defined below.

"Commercial Television." Programs produced by or for a U.S. commercial television station and broadcast only by that one station during the calendar year in question and not coming within the exception described in subpart 3) of the "Program Suppliers" definition.

"Public Broadcasting." All programs broadcast on U.S. noncommercial educational television stations.

"Devotional Claimants." Syndicated programs of a primarily religious theme, not limited to those produced by or for religious institutions.

"Canadian Claimants." All programs broadcast on Canadian television stations, except (1) live telecasts of Major League Baseball, National Hockey League, and U.S. college team sports, and (2) other programs owned by U. S. copyright owners.

EXHIBIT 17

	wbr call sign	YEAR	CALL-DIGI	CALLSIGN	CALL-CITY	CALL- STATE	Average Distant Subscribers	TOTAL DISTANT FEES-GEN
1	WGNA	2000	WGN	WGN	CHICAGO	IL	33696043	53331729
2	WPIX	2000	WPIX	WPIX	NEW YORK	NY	2719389	3907516
3	CBUT	2000	CBUT	CBUT	VANCOUVER	BC	877249	1165871
4	WSBK	2000	WSBK	WSBK	BOSTON	MA	835841	1003815
5	KTLA	2000	KTLA	KTLA	LOS ANGELES	CA	756424	1209371
6	WUAB	2000	WUAB	WUAB	LORAIN	OH	735018	996273
7	WWOR	2000	WWOR	WWOR	SECAUCUS	NJ	653549	1007836
8	WNBC	2000	WNBC	WNBC	NEW YORK	NY	563574	278914
9	WPHL	2000	WPHL	WPHL	PHILADELPHIA	PA	536303	583516
10	CKSH	2000	CKSH	CKSH	SHERBROOKE	QU	535949	593661
11	WKBD	2000	WKBD	WKBD	DETROIT	MI	423647	493640
12	WSEE	2000	WSEE	WSEE	ERIE	PA	365613	196536
13	WPSG	2000	WPSG	WPSG	PHILADELPHIA	PA	340152	598081
14	WKRN	2000	WKRN	WKRN	NASHVILLE	TN	330171	186229
15	CBET	2000	CBET	CBET	WINDSOR	ON	326603	317998
16	KCAL	2000	KCAL	KCAL	LOS ANGELES	CA	281057	514554
17	WTFX	2000	WTFX	WTFX	PHILADELPHIA	PA	245752	392834
18	WIS	2000	WIS	WIS	COLUMBIA	SC	244359	108801
19	WXIX	2000	WXIX	WXIX	NEWPORT	KY	242724	259462
20	WBAL	2000	WBAL	WBAL	BALTIMORE	MD	242083	235730
21	WJZ	2000	WJZ	WJZ	BALTIMORE	MD	230802	148733
22	WBRE	2000	WBRE	WBRE	WILKES-BARRE	PA	229514	94231
23	KGO	2000	KGO	KGO	SAN FRANCISCO	CA	227789	77542
24	WNYW	2000	WNYW	WNYW	NEW YORK	NY	217477	328823
25	WVTV	2000	WVTV	WVTV	MILWAUKEE	WI	208357	208792
26	CFTO	2000	CFTO	CFTO	TORONTO	ON	199977	160226
27	WSB	2000	WSB	WSB	ATLANTA	GA	193214	59281
28	CBLT	2000	CBLT	CBLT	TORONTO	ON	192263	146197
29	WBNS	2000	WBNS	WBNS	COLUMBUS	OH	188389	63117
30	KCOP	2000	KCOP	KCOP	LOS ANGELES	CA	186458	354627
31	WFAA	2000	WFAA	WFAA	DALLAS	TX	176431	63034
32	KARK	2000	KARK	KARK	LITTLE ROCK	AR	165138	142399
33	KCRA	2000	KCRA	KCRA	SACRAMENTO	CA	163818	70211
34	WXIA	2000	WXIA	WXIA	ATLANTA	GA	163029	65189
35	KTNC	2000	KTNC	KTNC	CONCORD	CA	159730	152653
36	KCWX	2000	KCWX	KCWX	FREDERICKSBURG	TX	159592	170204
37	WCAU	2000	WCAU	WCAU	PHILADELPHIA	PA	158874	68070
38	WISN	2000	WISN	WISN	MILWAUKEE	WI	152122	153815

39	WPVI	2000 WPVI	WPVI	PHILADELPHIA	PA	146705	61239
40	WDIV	2000 WDIV	WDIV	DETROIT	MI	146214	48409
41	KNBC	2000 KNBC	KNBC	LOS ANGELES	CA	145092	53185
42	KABC	2000 KABC	KABC	LOS ANGELES	CA	142666	58750
43	KYW	2000 KYW	KYW	PHILADELPHIA	PA	142206	109339
44	KMSP	2000 KMSP	KMSP	MINNEAPOLIS	MN	141303	205004
45	WTMJ	2000 WTMJ	WTMJ	MILWAUKEE	WI	139423	41054
46	WSFL	2000 WSFL	WSFL	MIAMI	FL	135032	103178
47	KATV	2000 KATV	KATV	LITTLE ROCK	AR	130292	90709
48	KWGN	2000 KWGN	KWGN	DENVER	CO	128448	291520
49	KRON	2000 KRON	KRON	SAN FRANCISCO	CA	128430	47243
50	KDKA	2000 KDKA	KDKA	PITTSBURGH	PA	123182	43417
51	KICU	2000 KICU	KICU	SAN JOSE	CA	123005	92679
52	WBZ	2000 WBZ	WBZ	BOSTON	MA	122405	112793
53	WSYX	2000 WSYX	WSYX	COLUMBUS	OH	119525	40759
54	WIAT	2000 WIAT	WIAT	BIRMINGHAM	AL	114661	53422
55	WDCA	2000 WDCA	WDCA	WASHINGTON	DC	113786	182384
56	KXTX	2000 KXTX	KXTX	DALLAS	TX	107197	133214
57	WUSA	2000 WUSA	WUSA	WASHINGTON	DC	106724	50338
58	KTHV	2000 KTHV	KTHV	LITTLE ROCK	AR	102739	43249
59	KPLR	2000 KPLR	KPLR	ST LOUIS	MO	102149	156590
60	WWLP	2000 WWLP	WWLP	SPRINGFIELD	MA	101882	30619
61	CHCH	2000 CHCH	CHCH	HAMILTON	ON	99026	109676
62	KCNC	2000 KCNC	KCNC	DENVER	CO	97919	59518
63	CKWS	2000 CKWS	CKWS	KINGSTON	ON	97667	78919
64	KSHB	2000 KSHB	KSHB	KANSAS CITY	MO	97407	81776
65	WTAE	2000 WTAE	WTAE	PITTSBURGH	PA	96532	47041
66	WRIC	2000 WRIC	WRIC	PETERSBURG	VA	95942	76690
67	WTRF	2000 WTRF	WTRF	WHEELING	WV	95774	45196
68	KSDK	2000 KSDK	KSDK	ST LOUIS	MO	93549	51614
69	CBMT	2000 CBMT	CBMT	MONTREAL	QU	92847	139934
70	WLVI	2000 WLVI	WLVI	CAMBRIDGE	MA	90954	94377
71	WAGA	2000 WAGA	WAGA	ATLANTA	GA	86802	107113
72	WMAR	2000 WMAR	WMAR	BALTIMORE	MD	85026	55769
73	WPXI	2000 WPXI	WPXI	PITTSBURGH	PA	84594	34469
74	KMBC	2000 KMBC	KMBC	KANSAS CITY	MO	83152	27967
75	WGCL	2000 WGCL	WGCL	ATLANTA	GA	81481	102968
76	WTTG	2000 WTTG	WTTG	WASHINGTON	DC	79988	90570
77	KBWB	2000 KBWB	KBWB	SAN FRANCISCO	CA	79208	46662
78	WCFT	2000 WCFT	WCFT	TUSCALOOSA	AL	78170	52902

MPAA Sample Stations in IPG Stations List - 2000

Organized according to Average Distant Subscribers

79	WWBT	2000	WWBT	WWBT	RICHMOND	VA	77794	40345
80	WITN	2000	WITN	WITN	WASHINGTON	NC	77698	25671
81	KTVU	2000	KTVU	KTVU	OAKLAND	CA	77651	114803
82	WRC	2000	WRC	WRC	WASHINGTON	DC	74510	26220
83	KPTV	2000	KPTV	KPTV	PORTLAND	OR	70874	161609
84	KTXL	2000	KTXL	KTXL	SACRAMENTO	CA	70291	100803
85	WTVD	2000	WTVD	WTVD	DURHAM	NC	70173	71217
86	KPIX	2000	KPIX	KPIX	SAN FRANCISCO	CA	70038	44764
87	WBRC	2000	WBRC	WBRC	BIRMINGHAM	AL	69525	63516
88	WLYH	2000	WLYH	WLYH	LEBANON	PA	69087	401344
89	WTOV	2000	WTOV	WTOV	STEUBENVILLE	OH	68039	34905
90	WFQX	2000	WFQX	WFQX	CADILLAC	MI	67411	99466
91	WCVB	2000	WCVB	WCVB	BOSTON	MA	67018	48892
92	WALA	2000	WALA	WALA	MOBILE	AL	65731	153455
93	WGAL	2000	WGAL	WGAL	LANCASTER	PA	63814	68099
94	WJLA	2000	WJLA	WJLA	WASHINGTON	DC	62736	39956
95	WFLD	2000	WFLD	WFLD	CHICAGO	IL	61730	113106
96	WBNX	2000	WBNX	WBNX	AKRON	OH	60277	120644
97	KFOR	2000	KFOR	KFOR	OKLAHOMA CITY	OK	56889	30211
98	KUSA	2000	KUSA	KUSA	DENVER	CO	56341	34740
99	KIAH	2000	KHCW	KIAH	HOUSTON	TX	55878	72472
100	KBCW	2000	KBCW	KBCW	SAN FRANCISCO	CA	55404	164888
101	KSL	2000	KSL	KSL	SALT LAKE CITY	UT	54163	24069
102	WKYT	2000	WKYT	WKYT	LEXINGTON	KY	53547	38690
103	WZMY	2000	WZMY	WZMY	DERRY	NH	52922	46057
104	WVTM	2000	WVTM	WVTM	BIRMINGHAM	AL	52682	28780
105	WBRZ	2000	WBRZ	WBRZ	BATON ROUGE	LA	52059	34937
106	KWTV	2000	KWTV	KWTV	OKLAHOMA CITY	OK	51932	25856
107	WUNI	2000	WUNI	WUNI	WORCESTER	MA	51694	43444
108	WYTV	2000	WYTV	WYTV	YOUNGSTOWN	OH	50929	31197
109	WTVR	2000	WTVR	WTVR	RICHMOND	VA	50914	27892
110	WMAQ	2000	WMAQ	WMAQ	CHICAGO	IL	50632	26758
111	WPTA	2000	WPTA	WPTA	FT WAYNE	IN	50192	44716
112	KMGH	2000	KMGH	KMGH	DENVER	CO	49353	25118
113	WDRB	2000	WDRB	WDRB	LOUISVILLE	KY	48683	98637
114	WMSN	2000	WMSN	WMSN	MADISON	WI	47881	34015
115	KTRK	2000	KTRK	KTRK	HOUSTON	TX	47624	15976
116	WVII	2000	WVII	WVII	BANGOR	ME	47556	16525
117	WLIO	2000	WLIO	WLIO	LIMA	OH	47405	11948
118	CIVT	2000	CIVT	CIVT	VANCOUVER	BC	46479	70760

MPAA Sample Stations in IPG Stations List - 2000

Organized according to Average Distant Subscribers

119	WWL	2000	WWL	WWL	NEW ORLEANS	LA	45970	24513
120	WEWS	2000	WEWS	WEWS	CLEVELAND	OH	45864	16291
121	KTTV	2000	KTTV	KTTV	LOS ANGELES	CA	45804	89015
122	WDBJ	2000	WDBJ	WDBJ	ROANOKE	VA	45409	62103
123	WNCT	2000	WNCT	WNCT	GREENVILLE	NC	45308	19621
124	KTVT	2000	KTVT	KTVT	FT WORTH	TX	45214	28602
125	WTAJ	2000	WTAJ	WTAJ	ALTOONA	PA	44931	28481
126	WTVF	2000	WTVF	WTVF	NASHVILLE	TN	44753	18889
127	CHLT	2000	CHLT	CHLT	SHERBROOKE	QU	44505	56927
128	KCBS	2000	KCBS	KCBS	LOS ANGELES	CA	44382	31244
129	WXYZ	2000	WXYZ	WXYZ	DETROIT	MI	43666	49191
130	WCCO	2000	WCCO	WCCO	MINNEAPOLIS	MN	43652	15923
131	WPMT	2000	WPMT	WPMT	YORK	PA	43526	296438
132	WAFB	2000	WAFB	WAFB	BATON ROUGE	LA	42961	22400
133	WTTV	2000	WTTV	WTTV	BLOOMINGTON	IN	42912	75888
134	WPCW	2000	WPCW	WPCW	JEANNETTE	PA	42911	42449
135	WKBN	2000	WKBN	WKBN	YOUNGSTOWN	OH	42525	26436
136	WPGH	2000	WPGH	WPGH	PITTSBURGH	PA	42457	81097
137	WHTM	2000	WHTM	WHTM	HARRISBURG	PA	42003	21357
138	WMC	2000	WMC	WMC	MEMPHIS	TN	40854	20782
139	WPXT	2000	WPXT	WPXT	PORTLAND	ME	40852	40809
140	KMOV	2000	KMOV	KMOV	ST LOUIS	MO	40269	17650
141	WXIN	2000	WXIN	WXIN	INDIANAPOLIS	IN	40139	165579
142	WWMT	2000	WWMT	WWMT	KALAMAZOO	MI	39945	32665
143	WLKY	2000	WLKY	WLKY	LOUISVILLE	KY	39780	61038
144	KDFW	2000	KDFW	KDFW	DALLAS	TX	37935	54506
145	CBFT	2000	CBFT	CBFT	MONTREAL	QU	37880	51272
146	KOIN	2000	KOIN	KOIN	PORTLAND	OR	37867	25013
147	WQAD	2000	WQAD	WQAD	MOLINE	IL	37289	19165
148	WNDU	2000	WNDU	WNDU	SOUTH BEND	IN	36683	14418
149	WVLA	2000	WVLA	WVLA	BATON ROUGE	LA	36218	26694
150	KIMT	2000	KIMT	KIMT	MASON CITY	IA	36153	25549
151	WDSU	2000	WDSU	WDSU	NEW ORLEANS	LA	34241	24250
152	WABM	2000	WABM	WABM	BIRMINGHAM	AL	34077	24838
153	WACY	2000	WACY	WACY	APPLETON	WI	33774	41704
154	WTLV	2000	WTLV	WTLV	JACKSONVILLE	FL	33666	33500
155	WCIA	2000	WCIA	WCIA	CHAMPAIGN	IL	33311	34465
156	KVMY	2000	KVMY	KVMY	LAS VEGAS	NV	32936	85147
157	WFXT	2000	WFXT	WFXT	BOSTON	MA	32245	81405
158	KNXV	2000	KNXV	KNXV	PHOENIX	AZ	31835	29864

MPAA Sample Stations in IPG Stations List - 2000

Organized according to Average Distant Subscribers

159	WLTV	2000	WLTV	WLTV	MIAMI	FL	31367	29386
160	WUHF	2000	WUHF	WUHF	ROCHESTER	NY	31201	36562
161	WIWB	2000	WIWB	WIWB	SURING	WI	30998	38976
162	KTVK	2000	KTVK	KTVK	PHOENIX	AZ	30472	66767
163	WXTV	2000	WXTV	WXTV	PATERSON	NJ	29804	45994
164	WPXN	2000	WPXN	WPXN	NEW YORK	NY	29722	45896
165	WSAH	2000	WSAH	WSAH	BRIDGEPORT	CT	29519	77886
166	KSTW	2000	KSTW	KSTW	TACOMA	WA	28865	68569
167	WSLS	2000	WSLS	WSLS	ROANOKE	VA	28067	38926
168	WMYD	2000	WMYD	WMYD	DETROIT	MI	27330	36305
169	WTTE	2000	WTTE	WTTE	COLUMBUS	OH	27071	41063
170	WPCB	2000	WPCB	WPCB	GREENSBURG	PA	27060	106372
171	WDSI	2000	WDSI	WDSI	CHATTANOOGA	TN	26248	49269
172	WWTW	2000	WWTW	WWTW	CADILLAC	MI	25639	35581
173	KKYK	2000	KYPX	DKKYK	CAMDEN	AR	25540	38221
174	WICZ	2000	WICZ	WICZ	BINGHAMTON	NY	24750	41478
175	WNUV	2000	WNUV	WNUV	BALTIMORE	MD	24458	30043
176	KAZT	2000	KAZT	KAZT	PRESCOTT	AZ	24449	132975
177	WYOU	2000	WYOU	WYOU	SCRANTON	PA	24042	6858
178	CBWT	2000	CBWT	CBWT	WINNIPEG	MB	23532	48506
179	KTSF	2000	KTSF	KTSF	SAN FRANCISCO	CA	23382	29339
180	WCTX	2000	WCTX	WCTX	NEW HAVEN	CT	22551	33188
181	WCWG	2000	WCWG	WCWG	LEXINGTON	NC	21762	77050
182	WDCW	2000	WDCW	WDCW	WASHINGTON	DC	21368	79395
183	WDAF	2000	WDAF	WDAF	KANSAS CITY	MO	21363	63201
184	WFXV	2000	WFXV	WFXV	UTICA	NY	21342	39501
185	WNYS	2000	WNYS	WNYS	SYRACUSE	NY	19796	27150
186	KOKH	2000	KOKH	KOKH	OKLAHOMA CITY	OK	19530	52589
187	WAPK	2000	WAPK	WAPK	KINGSPORT	TN	18351	167597
188	WMYO	2000	WMYO	WMYO	SALEM	IN	18001	62667
189	WNOL	2000	WNOL	WNOL	NEW ORLEANS	LA	16508	38294
190	WGNT	2000	WGNT	WGNT	PORTSMOUTH	VA	16404	27245
191	WKAQ	2000	WKAQ	WKAQ	SAN JUAN	PR	14873	19779
192	WATL	2000	WATL	WATL	ATLANTA	GA	14573	30693
193	WBUI	2000	WBUI	WBUI	DECATUR	IL	14254	48763
194	WDKY	2000	WDKY	WDKY	DANVILLE	KY	13581	28998
195	KSTS	2000	KSTS	KSTS	SAN JOSE	CA	13540	25016
196	WCHS	2000	WCHS	WCHS	CHARLESTON	WV	13099	6713
197	WVUE	2000	WVUE	WVUE	NEW ORLEANS	LA	12298	30878
198	KAUT	2000	KAUT	KAUT	OKLAHOMA CITY	OK	12199	34065

MPAA Sample Stations in IPG Stations List - 2000

Organized according to Average Distant Subscribers

199	KOKI	2000	KOKI	KOKI	TULSA	OK	11922	32687
200	XEW	2000	XEW	XEW	MEXICO CITY	DF	11036	30376
201	KXLT	2000	KXLT	KXLT	ROCHESTER	MN	11027	40767
202	WTGS	2000	WTGS	WTGS	HARDEEVILLE	SC	10986	27884
203	WIPX	2000	WIPX	WIPX	BLOOMINGTON	IN	10404	30717
204	WCGV	2000	WCGV	WCGV	MILWAUKEE	WI	10335	41730
205	WITI	2000	WITI	WITI	MILWAUKEE	WI	10249	50964
206	KLAX	2000	KLAX	KLAX	ALEXANDRIA	LA	9691	30912
207	WTOG	2000	WTOG	WTOG	ST PETERSBURG	FL	9553	33288
208	WLMT	2000	WLMT	WLMT	MEMPHIS	TN	9219	48005
209	WHNO	2000	WHNO	WHNO	NEW ORLEANS	LA	7845	32116
210	KSMS	2000	KSMS	KSMS	SALINAS-MONTEREY	CA	7064	16399
211	WJTC	2000	WJTC	WJTC	PENSACOLA	FL	6670	24683
212	WPME	2000	WPME	WPME	LEWISTON	ME	6573	25057
213	KTXA	2000	KTXA	KTXA	FT WORTH	TX	6170	46120
214	WSNS	2000	WSNS	WSNS	CHICAGO	IL	5464	7480
215	WGBO	2000	WGBO	WGBO	JOLIET	IL	4796	6290
216	WSYT	2000	WSYT	WSYT	SYRACUSE	NY	4560	52322
217	KSFX	2000	KSFX	KSFX	SPRINGFIELD	MO	4366	35400
218	WTVZ	2000	WTVZ	WTVZ	NORFOLK	VA	3773	32088
219	WPXU	2000	WPXU	WPXU	JACKSONVILLE	NC	3289	28601
220	XEWT	2000	XEWT	XEWT	TIAJUANA	BJ	3157	9931
221	KUVS	2000	KUVS	KUVS	MODESTO	CA	2174	1833
222	KJTV	2000	KJTV	KJTV	LUBBOCK	TX	1779	24845
223	WECT	2000	WECT	WECT	WILMINGTON	NC	681	670
							57,757,468	\$ 80,504,364
SUBS								
RANK	MPAA STATIONS NOT IN IPG SURVEY							
316	WBPX	2000	WBPX	WBPX	BOSTON	MA	21545	19514
379	WUTF	2000	WUTF	WUTF	MARLBOROUGH	MA	14396	21626

	wbr call sign	YEAR	CALL-DIGI	CALLSIGN	CALL-CITY	CALL-STATE	Average Distant Subscribers	TOTAL DISTANT FEES-GEN
1	WGNA	2001	WGN	WGN	CHICAGO	IL	33216139	53177864
2	WPIX	2001	WPIX	WPIX	NEW YORK	NY	2656197	3965173
3	CBUT	2001	CBUT	CBUT	VANCOUVER	BC	901510	1195908
4	WSBK	2001	WSBK	WSBK	BOSTON	MA	804657	1033536
5	WUAB	2001	WUAB	WUAB	LORAIN	OH	780229	1080839
6	KTLA	2001	KTLA	KTLA	LOS ANGELES	CA	704829	1200121
7	WNBC	2001	WNBC	WNBC	NEW YORK	NY	608752	331885
8	CKSH	2001	CKSH	CKSH	SHERBROOKE	QU	579127	683466
9	WPHL	2001	WPHL	WPHL	PHILADELPHIA	PA	549130	622523
10	WWOR	2001	WWOR	WWOR	SECAUCUS	NJ	498709	801891
11	WPSG	2001	WPSG	WPSG	PHILADELPHIA	PA	453453	779480
12	WKBD	2001	WKBD	WKBD	DETROIT	MI	448878	535814
13	KTNC	2001	KTNC	KTNC	CONCORD	CA	427487	451844
14	WSEE	2001	WSEE	WSEE	ERIE	PA	408597	241145
15	CBET	2001	CBET	CBET	WINDSOR	ON	382406	564420
16	WKRN	2001	WKRN	WKRN	NASHVILLE	TN	367400	228503
17	KCAL	2001	KCAL	KCAL	LOS ANGELES	CA	264886	515441
18	KGO	2001	KGO	KGO	SAN FRANCISCO	CA	260124	90608
19	WBNS	2001	WBNS	WBNS	COLUMBUS	OH	248252	98966
20	WIS	2001	WIS	WIS	COLUMBIA	SC	248095	102296
21	WLTV	2001	WLTV	WLTV	MIAMI	FL	239353	267065
22	WTFX	2001	WTFX	WTFX	PHILADELPHIA	PA	231159	380527
23	WBRE	2001	WBRE	WBRE	WILKES-BARRE	PA	229488	106767
24	CFTO	2001	CFTO	CFTO	TORONTO	ON	223120	180844
25	WNYW	2001	WNYW	WNYW	NEW YORK	NY	217802	343634
26	WJZ	2001	WJZ	WJZ	BALTIMORE	MD	216271	134938
27	CBLT	2001	CBLT	CBLT	TORONTO	ON	215384	165793
28	WVTV	2001	WVTV	WVTV	MILWAUKEE	WI	211389	252147
29	WXIX	2001	WXIX	WXIX	NEWPORT	KY	198744	259654
30	WBAL	2001	WBAL	WBAL	BALTIMORE	MD	186803	169143
31	KCRA	2001	KCRA	KCRA	SACRAMENTO	CA	167677	68432
32	WSB	2001	WSB	WSB	ATLANTA	GA	165660	61519
33	WXIA	2001	WXIA	WXIA	ATLANTA	GA	163349	59377
34	WFAA	2001	WFAA	WFAA	DALLAS	TX	163183	84391
35	WISN	2001	WISN	WISN	MILWAUKEE	WI	160634	166882
36	KABC	2001	KABC	KABC	LOS ANGELES	CA	158850	79983
37	WCAU	2001	WCAU	WCAU	PHILADELPHIA	PA	158182	74176

MPAA Sample Stations in IPG Stations List - 2001

Organized according to Average Distant Subscribers

38	KARK	2001	KARK	KARK	LITTLE ROCK	AR	148674	90404
39	WDIV	2001	WDIV	WDIV	DETROIT	MI	147937	52916
40	WPVI	2001	WPVI	WPVI	PHILADELPHIA	PA	147597	72539
41	WTMJ	2001	WTMJ	WTMJ	MILWAUKEE	WI	145843	41817
42	WIAT	2001	WIAT	WIAT	BIRMINGHAM	AL	144225	66252
43	KCOP	2001	KCOP	KCOP	LOS ANGELES	CA	139017	232437
44	KYW	2001	KYW	KYW	PHILADELPHIA	PA	137946	114805
45	KMSP	2001	KMSP	KMSP	MINNEAPOLIS	MN	137854	302704
46	KNBC	2001	KNBC	KNBC	LOS ANGELES	CA	136826	48320
47	WSFL	2001	WSFL	WSFL	MIAMI	FL	133299	100150
48	KDKA	2001	KDKA	KDKA	PITTSBURGH	PA	131432	50865
49	KWGN	2001	KWGN	KWGN	DENVER	CO	130761	242941
50	KICU	2001	KICU	KICU	SAN JOSE	CA	129305	109618
51	KRON	2001	KRON	KRON	SAN FRANCISCO	CA	127819	40353
52	KATV	2001	KATV	KATV	LITTLE ROCK	AR	125885	89818
53	WSYX	2001	WSYX	WSYX	COLUMBUS	OH	124831	57245
54	CBMT	2001	CBMT	CBMT	MONTREAL	QU	122049	169202
55	WRIC	2001	WRIC	WRIC	PETERSBURG	VA	116152	82747
56	WKYT	2001	WKYT	WKYT	LEXINGTON	KY	113368	66199
57	WDCA	2001	WDCA	WDCA	WASHINGTON	DC	113296	176642
58	WUSA	2001	WUSA	WUSA	WASHINGTON	DC	112075	54840
59	WTAE	2001	WTAE	WTAE	PITTSBURGH	PA	110726	80920
60	WBZ	2001	WBZ	WBZ	BOSTON	MA	110217	84052
61	KTHV	2001	KTHV	KTHV	LITTLE ROCK	AR	107484	50190
62	KXTX	2001	KXTX	KXTX	DALLAS	TX	100368	131978
63	WCVB	2001	WCVB	WCVB	BOSTON	MA	97948	105456
64	WUNI	2001	WUNI	WUNI	WORCESTER	MA	97546	92782
65	WWBT	2001	WWBT	WWBT	RICHMOND	VA	97439	48101
66	CKWS	2001	CKWS	CKWS	KINGSTON	ON	97273	87140
67	KTVU	2001	KTVU	KTVU	OAKLAND	CA	93294	105444
68	WZMY	2001	WZMY	WZMY	DERRY	NH	93056	137600
69	WLVI	2001	WLVI	WLVI	CAMBRIDGE	MA	92638	140554
70	WPGH	2001	WPGH	WPGH	PITTSBURGH	PA	87685	164306
71	KPLR	2001	KPLR	KPLR	ST LOUIS	MO	87621	157325
72	KBWB	2001	KBWB	KBWB	SAN FRANCISCO	CA	85013	56930
73	KCNC	2001	KCNC	KCNC	DENVER	CO	84988	49349
74	WTTG	2001	WTTG	WTTG	WASHINGTON	DC	83931	96596
75	WBRC	2001	WBRC	WBRC	BIRMINGHAM	AL	81709	78321
76	WMAR	2001	WMAR	WMAR	BALTIMORE	MD	79037	52237
77	WGCL	2001	WGCL	WGCL	ATLANTA	GA	78630	95595

MPAA Sample Stations in IPG Stations List - 2001

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78	WHDH	2001	WHDH	WHDH	BOSTON	MA	77841	31607
79	WRC	2001	WRC	WRC	WASHINGTON	DC	75988	25766
80	KPTV	2001	KPTV	KPTV	PORTLAND	OR	75599	165582
81	WBNX	2001	WBNX	WBNX	AKRON	OH	75420	153289
82	KMBC	2001	KMBC	KMBC	KANSAS CITY	MO	74490	24283
83	WPXI	2001	WPXI	WPXI	PITTSBURGH	PA	73865	42363
84	WITN	2001	WITN	WITN	WASHINGTON	NC	73378	22670
85	KSDK	2001	KSDK	KSDK	ST LOUIS	MO	71897	43150
86	KSHB	2001	KSHB	KSHB	KANSAS CITY	MO	70657	82003
87	WTVD	2001	WTVD	WTVD	DURHAM	NC	69942	57557
88	KTXL	2001	KTXL	KTXL	SACRAMENTO	CA	69138	103823
89	WFQX	2001	WFQX	WFQX	CADILLAC	MI	68421	143664
90	WLYH	2001	WLYH	WLYH	LEBANON	PA	68314	418640
91	WBRZ	2001	WBRZ	WBRZ	BATON ROUGE	LA	67299	41315
92	WALA	2001	WALA	WALA	MOBILE	AL	65230	165571
93	WTRF	2001	WTRF	WTRF	WHEELING	WV	64874	28475
94	WGAL	2001	WGAL	WGAL	LANCASTER	PA	63795	47557
95	WFLD	2001	WFLD	WFLD	CHICAGO	IL	62610	116936
96	WNEG	2001	WNEG	WNEG	TOCCOA	GA	57295	44147
97	WPMY	2001	WPMY	WPMY	PITTSBURGH	PA	56799	78789
98	KFOR	2001	KFOR	KFOR	OKLAHOMA CITY	OK	56502	30773
99	KSTW	2001	KSTW	KSTW	TACOMA	WA	55195	201583
100	KCBS	2001	KCBS	KCBS	LOS ANGELES	CA	54565	48873
101	WVTM	2001	WVTM	WVTM	BIRMINGHAM	AL	54085	26990
102	WWL	2001	WWL	WWL	NEW ORLEANS	LA	53765	33386
103	CBFT	2001	CBFT	CBFT	MONTREAL	QU	53703	58779
104	KBCW	2001	KBCW	KBCW	SAN FRANCISCO	CA	53441	179395
105	KPIX	2001	KPIX	KPIX	SAN FRANCISCO	CA	53215	37316
106	WJLA	2001	WJLA	WJLA	WASHINGTON	DC	53122	40445
107	KUSA	2001	KUSA	KUSA	DENVER	CO	52605	34927
108	WMAQ	2001	WMAQ	WMAQ	CHICAGO	IL	52548	30027
109	WGME	2001	WGME	WGME	PORTLAND	ME	52543	32682
110	WTVR	2001	WTVR	WTVR	RICHMOND	VA	51710	31092
111	WWLP	2001	WWLP	WWLP	SPRINGFIELD	MA	51623	13105
112	KWTV	2001	KWTV	KWTV	OKLAHOMA CITY	OK	51289	26796
113	WTOV	2001	WTOV	WTOV	STEUBENVILLE	OH	50941	44326
114	WTAJ	2001	WTAJ	WTAJ	ALTOONA	PA	50233	33357
115	WMC	2001	WMC	WMC	MEMPHIS	TN	49293	21710
116	KTRK	2001	KTRK	KTRK	HOUSTON	TX	47231	16945
117	WDTA	2001	WDTA-	WDTA-	FAYETTEVILLE	GA	46612	130355

118	KSL	2001	KSL	KSL	SALT LAKE CITY	UT	46344	19211
119	CIVT	2001	CIVT	CIVT	VANCOUVER	BC	46238	66878
120	WPXT	2001	WPXT	WPXT	PORTLAND	ME	45869	63865
121	WCCO	2001	WCCO	WCCO	MINNEAPOLIS	MN	45832	15149
122	WOWK	2001	WOWK	WOWK	HUNTINGTON	WV	45502	29376
123	WPCW	2001	WPCW	WPCW	JEANNETTE	PA	45236	45176
124	WPMT	2001	WPMT	WPMT	YORK	PA	45140	322764
125	WFMZ	2001	WFMZ	WFMZ	ALLENTOWN	PA	44343	71310
126	WBPX	2001	WBPX	WBPX	BOSTON	MA	43937	35158
127	WAGA	2001	WAGA	WAGA	ATLANTA	GA	43699	57586
128	CHLT	2001	CHLT	CHLT	SHERBROOKE	QU	43687	49729
129	KMGH	2001	KMGH	KMGH	DENVER	CO	43156	28763
130	WYTV	2001	WYTV	WYTV	YOUNGSTOWN	OH	42713	39470
131	CHCH	2001	CHCH	CHCH	HAMILTON	ON	42448	46492
132	WEWS	2001	WEWS	WEWS	CLEVELAND	OH	42193	17480
133	WNDU	2001	WNDU	WNDU	SOUTH BEND	IN	42059	16278
134	WVLA	2001	WVLA	WVLA	BATON ROUGE	LA	41551	28630
135	WCFT	2001	WCFT	WCFT	TUSCALOOSA	AL	40767	26939
136	WAFB	2001	WAFB	WAFB	BATON ROUGE	LA	40606	13838
137	WNCT	2001	WNCT	WNCT	GREENVILLE	NC	40084	20816
138	WLKY	2001	WLKY	WLKY	LOUISVILLE	KY	40037	44990
139	KOIN	2001	KOIN	KOIN	PORTLAND	OR	39992	26130
140	WHTM	2001	WHTM	WHTM	HARRISBURG	PA	39017	16270
141	WDSU	2001	WDSU	WDSU	NEW ORLEANS	LA	38887	30678
142	WDBJ	2001	WDBJ	WDBJ	ROANOKE	VA	38765	64398
143	WWMT	2001	WWMT	WWMT	KALAMAZOO	MI	38699	32757
144	WHBQ	2001	WHBQ	WHBQ	MEMPHIS	TN	38383	54228
145	WRTV	2001	WRTV	WRTV	INDIANAPOLIS	IN	38053	26585
146	WDRB	2001	WDRB	WDRB	LOUISVILLE	KY	37785	108974
147	WSVN	2001	WSVN	WSVN	MIAMI	FL	37758	83088
148	KMOV	2001	KMOV	KMOV	ST LOUIS	MO	37530	17802
149	WMYD	2001	WMYD	WMYD	DETROIT	MI	37510	47788
150	WACY	2001	WACY	WACY	APPLETON	WI	35504	35724
151	WIWB	2001	WIWB	WIWB	SURING	WI	35504	35724
152	KNXV	2001	KNXV	KNXV	PHOENIX	AZ	35389	30788
153	WKBN	2001	WKBN	WKBN	YOUNGSTOWN	OH	35383	23824
154	KTVK	2001	KTVK	KTVK	PHOENIX	AZ	35037	95136
155	WLIO	2001	WLIO	WLIO	LIMA	OH	34539	9590
156	WTVF	2001	WTVF	WTVF	NASHVILLE	TN	34335	17226
157	WPCB	2001	WPCB	WPCB	GREENSBURG	PA	33792	143774

MPAA Sample Stations in IPG Stations List - 2001

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158	WABM	2001	WABM	WABM	BIRMINGHAM	AL	33598	27548
159	WUHF	2001	WUHF	WUHF	ROCHESTER	NY	33546	49994
160	WBQC	2001	WBQC-	WBQC-	CINCINNATI	OH	33490	32777
161	WVPX	2001	WVPX	WVPX	AKRON	OH	32259	26511
162	WXIN	2001	WXIN	WXIN	INDIANAPOLIS	IN	32024	110785
163	WDCW	2001	WDCW	WDCW	WASHINGTON	DC	32007	97043
164	KUSI	2001	KUSI	KUSI	SAN DIEGO	CA	31843	42911
165	KKYK	2001	KYPX	DKKYK	CAMDEN	AR	31788	48803
166	WTTV	2001	WTTV	WTTV	BLOOMINGTON	IN	31662	106820
167	WFXT	2001	WFXT	WFXT	BOSTON	MA	31473	70145
168	WQAD	2001	WQAD	WQAD	MOLINE	IL	31287	19455
169	WSAH	2001	WSAH	WSAH	BRIDGEPORT	CT	31048	88449
170	WYOU	2001	WYOU	WYOU	SCRANTON	PA	30543	10098
171	WTTE	2001	WTTE	WTTE	COLUMBUS	OH	30023	45160
172	WXTV	2001	WXTV	WXTV	PATERSON	NJ	29934	50484
173	WPXN	2001	WPXN	WPXN	NEW YORK	NY	29855	50381
174	WSLS	2001	WSLS	WSLS	ROANOKE	VA	27968	37449
175	WMYO	2001	WMYO	WMYO	SALEM	IN	27402	87661
176	WALV	2001	WALV-	WALV-	INDIANAPOLIS	IN	27246	35210
177	CBWT	2001	CBWT	CBWT	WINNIPEG	MB	26861	65058
178	KDFW	2001	KDFW	KDFW	DALLAS	TX	26542	37095
179	WPTA	2001	WPTA	WPTA	FT WAYNE	IN	26382	11423
180	WICZ	2001	WICZ	WICZ	BINGHAMTON	NY	24844	48875
181	WFXV	2001	WFXV	WFXV	UTICA	NY	24251	52920
182	WBGNL	2001	WBGN-	WBGN-	PITTSBURGH	PA	24078	28363
183	WQRF	2001	WQRF	WQRF	ROCKFORD	IL	23900	28037
184	WFXP	2001	WFXP	WFXP	ERIE	PA	23398	43134
185	KTSF	2001	KTSF	KTSF	SAN FRANCISCO	CA	23230	31792
186	WNYS	2001	WNYS	WNYS	SYRACUSE	NY	22645	40346
187	WCTX	2001	WCTX	WCTX	NEW HAVEN	CT	22643	32690
188	WAPK	2001	WAPK	WAPK	KINGSPORT	TN	22441	211730
189	WCHS	2001	WCHS	WCHS	CHARLESTON	WV	22126	15366
190	WPXX	2001	WPXX	WPXX	MEMPHIS	TN	22096	73311
191	WWPX	2001	WWPX	WWPX	MARTINSBURG	WV	21303	26096
192	WCWG	2001	WCWG	WCWG	LEXINGTON	NC	20380	77967
193	WLUK	2001	WLUK	WLUK	GREEN BAY	WI	20178	36805
194	WDKY	2001	WDKY	WDKY	DANVILLE	KY	19810	29614
195	WXYZ	2001	WXYZ	WXYZ	DETROIT	MI	19419	7172
196	WITI	2001	WITI	WITI	MILWAUKEE	WI	18968	62592
197	WCGV	2001	WCGV	WCGV	MILWAUKEE	WI	18968	57533

MPAA Sample Stations in IPG Stations List - 2001

Organized according to Average Distant Subscribers

198	WEUX	2001	WEUX	WEUX	CHIPPEWA FALLS	WI	18655	54567	
199	KOKH	2001	KOKH	KOKH	OKLAHOMA CITY	OK	18140	58230	
200	WUTF	2001	WUTF	WUTF	MARLBOROUGH	MA	17958	37236	
201	WTGS	2001	WTGS	WTGS	HARDEEVILLE	SC	16943	87873	
202	WGNT	2001	WGNT	WGNT	PORTSMOUTH	VA	16758	34531	
203	WDAF	2001	WDAF	WDAF	KANSAS CITY	MO	15158	45842	
204	WKAQ	2001	WKAQ	WKAQ	SAN JUAN	PR	14527	19893	
205	WLMT	2001	WLMT	WLMT	MEMPHIS	TN	14350	46993	
206	KAZT	2001	KAZT	KAZT	PRESCOTT	AZ	14070	112514	
207	KOKI	2001	KOKI	KOKI	TULSA	OK	13760	34687	
208	WVUE	2001	WVUE	WVUE	NEW ORLEANS	LA	12543	34455	
209	KSTS	2001	KSTS	KSTS	SAN JOSE	CA	12309	24281	
210	KAUT	2001	KAUT	KAUT	OKLAHOMA CITY	OK	11724	34397	
211	WFXS	2001	WFXS	WFXS	WITTENBERG	WI	11358	40009	
212	KTXA	2001	KTXA	KTXA	FT WORTH	TX	11290	60723	
213	WCCB	2001	WCCB	WCCB	CHARLOTTE	NC	11246	29379	
214	KXLT	2001	KXLT	KXLT	ROCHESTER	MN	11019	37796	
215	XEW	2001	XEW	XEW	MEXICO CITY	DF	11000	33458	
216	WVII	2001	WVII	WVII	BANGOR	ME	10382	4997	
217	WPME	2001	WPME	WPME	LEWISTON	ME	8864	47046	
218	WPXD	2001	WPXD	WPXD	ANN ARBOR	MI	8686	28474	
219	KLAX	2001	KLAX	KLAX	ALEXANDRIA	LA	8604	32913	
220	WPXU	2001	WPXU	WPXU	JACKSONVILLE	NC	7168	26076	
221	WJTC	2001	WJTC	WJTC	PENSACOLA	FL	6849	25811	
222	WUPA	2001	WUPA	WUPA	ATLANTA	GA	6828	31941	
223	KCNS	2001	KCNS	KCNS	SAN FRANCISCO	CA	6690	69023	
224	KSMS	2001	KSMS	KSMS	SALINAS-MONTEREY	CA	6422	15740	
225	WSNS	2001	WSNS	WSNS	CHICAGO	IL	5794	8530	
226	WBKI	2001	WBKI	WBKI	CAMPBELLSVILLE	KY	3992	27811	
227	WSYT	2001	WSYT	WSYT	SYRACUSE	NY	3593	33653	
228	WECT	2001	WECT	WECT	WILMINGTON	NC	3546	1649	
229	KDTV	2001	KDTV	KDTV	SAN FRANCISCO	CA	2732	6456	
230	WGBO	2001	WGBO	WGBO	JOLIET	IL	2357	3243	
231	KUVS	2001	KUVS	KUVS	MODESTO	CA	994	887	
							58,098,784	\$ 82,751,833	
SUBS									
RANK	MPAA STATIONS NOT IN IPG SURVEY								
114	WCMH	2001	WCMH	WCMH	COLUMBUS	OH	74408	18406	
130	WNWO	2001	WNWO	WNWO	TOLEDO	OH	62701	17167	

197	WPTY	2001 WPTY	WPTY	MEMPHIS	TN	40713	10517
771	WKPT	2001 WKPT	WKPT	KINGSPORT	TN	1272	1550

	wbr call sign	YEAR	CALL-DIGI	CALLSIGN	CALL-CITY	CALL- STATE	Average Distant Subscribers	TOTAL DISTANT FEES- GEN
1	WGNA	2002	WGN	WGN	CHICAGO	IL	33497414	56527445
2	WPIX	2002	WPIX	WPIX	NEW YORK	NY	2362579	3904893
3	CBUT	2002	CBUT	CBUT	VANCOUVER	BC	920982	1342610
4	WUAB	2002	WUAB	WUAB	LORAIN	OH	799369	1023571
5	WSBK	2002	WSBK	WSBK	BOSTON	MA	662558	905003
6	KTLA	2002	KTLA	KTLA	LOS ANGELES	CA	611433	1042557
7	CKSH	2002	CKSH	CKSH	SHERBROOKE	QU	547423	693644
8	WPHL	2002	WPHL	WPHL	PHILADELPHIA	PA	514397	641916
9	WWOR	2002	WWOR	WWOR	SECAUCUS	NJ	471286	821246
10	WNBC	2002	WNBC	WNBC	NEW YORK	NY	441752	252170
11	KTNC	2002	KTNC	KTNC	CONCORD	CA	422190	508991
12	WKBD	2002	WKBD	WKBD	DETROIT	MI	413772	529392
13	WBNS	2002	WBNS	WBNS	COLUMBUS	OH	363517	101759
14	CBET	2002	CBET	CBET	WINDSOR	ON	358016	408224
15	WPSG	2002	WPSG	WPSG	PHILADELPHIA	PA	348105	652105
16	WIS	2002	WIS	WIS	COLUMBIA	SC	328162	149086
17	WSYX	2002	WSYX	WSYX	COLUMBUS	OH	281892	52916
18	WSEE	2002	WSEE	WSEE	ERIE	PA	264713	180037
19	WTFX	2002	WTFX	WTFX	PHILADELPHIA	PA	260327	457212
20	KGO	2002	KGO	KGO	SAN FRANCISCO	CA	258293	94985
21	KCAL	2002	KCAL	KCAL	LOS ANGELES	CA	242893	449950
22	WXIX	2002	WXIX	WXIX	NEWPORT	KY	234376	243020
23	WJZ	2002	WJZ	WJZ	BALTIMORE	MD	215547	146892
24	WFAA	2002	WFAA	WFAA	DALLAS	TX	213908	75651
25	WKRN	2002	WKRN	WKRN	NASHVILLE	TN	210806	147568
26	CFTO	2002	CFTO	CFTO	TORONTO	ON	210153	274603
27	WUNI	2002	WUNI	WUNI	WORCESTER	MA	206724	171884
28	CBLT	2002	CBLT	CBLT	TORONTO	ON	201780	183063
29	WVTV	2002	WVTV	WVTV	MILWAUKEE	WI	200809	281231
30	WPVI	2002	WPVI	WPVI	PHILADELPHIA	PA	194193	88040
31	WNYW	2002	WNYW	WNYW	NEW YORK	NY	189053	300607
32	CBMT	2002	CBMT	CBMT	MONTREAL	QU	175515	569544
33	WSB	2002	WSB	WSB	ATLANTA	GA	174718	72674
34	WBAL	2002	WBAL	WBAL	BALTIMORE	MD	170849	116964
35	WSFJ	2002	WSFJ	WSFJ	NEWARK	OH	170071	61285
36	WJW	2002	WJW	WJW	CLEVELAND	OH	169638	82273
37	WCAU	2002	WCAU	WCAU	PHILADELPHIA	PA	168991	80203
38	WBRE	2002	WBRE	WBRE	WILKES-BARRE	PA	167590	79968

39	WWHO	2002	WWHO	WWHO	CHILlicoTHE	OH	164113	53980
40	WTLW	2002	WTLW	WTLW	LIMA	OH	162969	52921
41	KCRA	2002	KCRA	KCRA	SACRAMENTO	CA	160791	71111
42	KDKA	2002	KDKA	KDKA	PITTSBURGH	PA	160209	80564
43	WXIA	2002	WXIA	WXIA	ATLANTA	GA	157115	62423
44	WDIV	2002	WDIV	WDIV	DETROIT	MI	152589	53625
45	WISN	2002	WISN	WISN	MILWAUKEE	WI	145717	175235
46	WTMJ	2002	WTMJ	WTMJ	MILWAUKEE	WI	145717	53937
47	KYW	2002	KYW	KYW	PHILADELPHIA	PA	144297	120047
48	WBZ	2002	WBZ	WBZ	BOSTON	MA	142202	86262
49	KMSP	2002	KMSP	KMSP	MINNEAPOLIS	MN	139222	312970
50	KICU	2002	KICU	KICU	SAN JOSE	CA	136113	110834
51	KCOP	2002	KCOP	KCOP	LOS ANGELES	CA	135958	286909
52	KABC	2002	KABC	KABC	LOS ANGELES	CA	133192	77448
53	KWGN	2002	KWGN	KWGN	DENVER	CO	130829	213362
54	WDCA	2002	WDCA	WDCA	WASHINGTON	DC	130701	222363
55	KNBC	2002	KNBC	KNBC	LOS ANGELES	CA	127757	43905
56	KATV	2002	KATV	KATV	LITTLE ROCK	AR	125801	100624
57	WFLD	2002	WFLD	WFLD	CHICAGO	IL	125146	224387
58	WRIC	2002	WRIC	WRIC	PETERSBURG	VA	121976	81792
59	WPXS	2002	WPXS	WPXS	MT VERNON	IL	120711	156985
60	WUSA	2002	WUSA	WUSA	WASHINGTON	DC	118437	64703
61	WTAE	2002	WTAE	WTAE	PITTSBURGH	PA	117658	81017
62	WIAT	2002	WIAT	WIAT	BIRMINGHAM	AL	117022	65950
63	WMAQ	2002	WMAQ	WMAQ	CHICAGO	IL	115060	54634
64	WLVI	2002	WLVI	WLVI	CAMBRIDGE	MA	113573	106077
65	WLTV	2002	WLTV	WLTV	MIAMI	FL	113510	167366
66	WWBT	2002	WWBT	WWBT	RICHMOND	VA	111941	56529
67	KARK	2002	KARK	KARK	LITTLE ROCK	AR	110934	64960
68	WCVB	2002	WCVB	WCVB	BOSTON	MA	109733	58900
69	KTHV	2002	KTHV	KTHV	LITTLE ROCK	AR	107766	58016
70	WMLW	2002	WMLW-	WMLW-	MILWAUKEE	WI	106908	142116
71	WSFL	2002	WSFL	WSFL	MIAMI	FL	106508	205651
72	WBBM	2002	WBBM	WBBM	CHICAGO	IL	105360	50917
73	KRON	2002	KRON	KRON	SAN FRANCISCO	CA	104529	56975
74	WUTF	2002	WUTF	WUTF	MARLBOROUGH	MA	104377	125878
75	WPMY	2002	WPMY	WPMY	PITTSBURGH	PA	97902	120744
76	WTOV	2002	WTOV	WTOV	STEUBENVILLE	OH	93631	136880
77	CKWS	2002	CKWS	CKWS	KINGSTON	ON	89873	94465
78	WBRZ	2002	WBRZ	WBRZ	BATON ROUGE	LA	89845	88369

79	KTVU	2002	KTVU	KTVU	OAKLAND	CA	88482	99298
80	KBWB	2002	KBWB	KBWB	SAN FRANCISCO	CA	84768	56284
81	WPGH	2002	WPGH	WPGH	PITTSBURGH	PA	84561	208598
82	WGCL	2002	WGCL	WGCL	ATLANTA	GA	84089	104253
83	KPTV	2002	KPTV	KPTV	PORTLAND	OR	83266	190436
84	KPLR	2002	KPLR	KPLR	ST LOUIS	MO	80747	137750
85	WPLG	2002	WPLG	WPLG	MIAMI	FL	80559	79218
86	WGME	2002	WGME	WGME	PORTLAND	ME	78669	38914
87	WNCT	2002	WNCT	WNCT	GREENVILLE	NC	76995	85096
88	KCNC	2002	KCNC	KCNC	DENVER	CO	76903	45417
89	WMAR	2002	WMAR	WMAR	BALTIMORE	MD	76299	35837
90	WTVD	2002	WTVD	WTVD	DURHAM	NC	76245	63269
91	WTTG	2002	WTTG	WTTG	WASHINGTON	DC	75078	97628
92	WBQC	2002	WBQC-	WBQC-	CINCINNATI	OH	74174	75092
93	WLYH	2002	WLYH	WLYH	LEBANON	PA	73770	455710
94	WFQX	2002	WFQX	WFQX	CADILLAC	MI	73720	149634
95	KSHB	2002	KSHB	KSHB	KANSAS CITY	MO	72950	94031
96	WALA	2002	WALA	WALA	MOBILE	AL	72664	184121
97	WPXI	2002	WPXI	WPXI	PITTSBURGH	PA	70669	66831
98	WBRC	2002	WBRC	WBRC	BIRMINGHAM	AL	69325	69243
99	KSDK	2002	KSDK	KSDK	ST LOUIS	MO	68844	41377
100	KTXL	2002	KTXL	KTXL	SACRAMENTO	CA	68002	105560
101	CHLT	2002	CHLT	CHLT	SHERBROOKE	QU	66717	90034
102	WZMY	2002	WZMY	WZMY	DERRY	NH	65395	119826
103	WTVR	2002	WTVR	WTVR	RICHMOND	VA	64764	36555
104	CBFT	2002	CBFT	CBFT	MONTREAL	QU	64084	162004
105	KCBS	2002	KCBS	KCBS	LOS ANGELES	CA	63600	73309
106	KPIX	2002	KPIX	KPIX	SAN FRANCISCO	CA	61474	44706
107	KUSI	2002	KUSI	KUSI	SAN DIEGO	CA	59686	90967
108	KSTW	2002	KSTW	KSTW	TACOMA	WA	58616	143259
109	WTVE	2002	WTVE	WTVE	READING	PA	57417	57770
110	WBGT	2002	WBGT-	WBGT-	ROCHESTER	NY	56613	75159
111	WLKY	2002	WLKY	WLKY	LOUISVILLE	KY	56080	44716
112	WTRF	2002	WTRF	WTRF	WHEELING	WV	55694	61580
113	KRMZ	2002	KMAS	KRMZ	STEAMBOAT SPRING	CO	55000	139252
114	KUSA	2002	KUSA	KUSA	DENVER	CO	53298	34545
115	KXTX	2002	KXTX	KXTX	DALLAS	TX	53247	91752
116	WFTC	2002	WFTC	WFTC	MINNEAPOLIS	MN	53036	234849
117	WBTV	2002	WBTV	WBTV	CHARLOTTE	NC	52596	69755
118	KBCW	2002	KBCW	KBCW	SAN FRANCISCO	CA	51733	163653

119	WNYS	2002	WNYS	WNYS	SYRACUSE	NY	50496	75255
120	WDRB	2002	WDRB	WDRB	LOUISVILLE	KY	47695	132046
121	WUVP	2002	WUVP	WUVP	VINELAND	NJ	47503	58252
122	WGAL	2002	WGAL	WGAL	LANCASTER	PA	46983	47539
123	CIVT	2002	CIVT	CIVT	VANCOUVER	BC	46803	67101
124	WCHS	2002	WCHS	WCHS	CHARLESTON	WV	46135	44769
125	KIRO	2002	KIRO	KIRO	SEATTLE	WA	45617	61029
126	WYTV	2002	WYTV	WYTV	YOUNGSTOWN	OH	45423	37030
127	KOIN	2002	KOIN	KOIN	PORTLAND	OR	45095	32382
128	KCSO	2002	KCSO-	KCSO-	SACRAMENTO	CA	44512	137047
129	WOHZ	2002	WOHZ-	WOHZ-	MANSFIELD	OH	44389	35098
130	WDTA	2002	WDTA-	WDTA-	FAYETTEVILLE	GA	43687	64088
131	WABM	2002	WABM	WABM	BIRMINGHAM	AL	43604	44366
132	WBNX	2002	WBNX	WBNX	AKRON	OH	43472	87258
133	CIII	2002	CIII	CIII	TORONTO	ON	43463	47164
134	KOMO	2002	KOMO	KOMO	SEATTLE	WA	43439	34132
135	WAGA	2002	WAGA	WAGA	ATLANTA	GA	43354	61192
136	WMYD	2002	WMYD	WMYD	DETROIT	MI	42099	69188
137	WVLA	2002	WVLA	WVLA	BATON ROUGE	LA	41427	33330
138	WDCW	2002	WDCW	WDCW	WASHINGTON	DC	39864	107707
139	WUHF	2002	WUHF	WUHF	ROCHESTER	NY	39648	54054
140	WJLA	2002	WJLA	WJLA	WASHINGTON	DC	39322	40121
141	WFXT	2002	WFXT	WFXT	BOSTON	MA	38906	105741
142	WICU	2002	WICU	WICU	ERIE	PA	38052	32361
143	WPMT	2002	WPMT	WPMT	YORK	PA	37105	229567
144	WDBJ	2002	WDBJ	WDBJ	ROANOKE	VA	36225	118251
145	CHCH	2002	CHCH	CHCH	HAMILTON	ON	33835	63620
146	KTVK	2002	KTVK	KTVK	PHOENIX	AZ	32227	75942
147	WHBQ	2002	WHBQ	WHBQ	MEMPHIS	TN	30812	64999
148	WPCW	2002	WPCW	WPCW	JEANNETTE	PA	30562	33616
149	WLSL	2002	WLSL	WLSL	ROANOKE	VA	30366	35988
150	WPXD	2002	WPXD	WPXD	ANN ARBOR	MI	30242	81961
151	WXTV	2002	WXTV	WXTV	PATERSON	NJ	29750	50785
152	WPXN	2002	WPXN	WPXN	NEW YORK	NY	29670	50672
153	WXIN	2002	WXIN	WXIN	INDIANAPOLIS	IN	29575	120054
154	WTTV	2002	WTTV	WTTV	BLOOMINGTON	IN	29337	70224
155	WEEE-	2002	WEEE-	WEEE-	KNOXVILLE	TN	29005	39673
156	CBWT	2002	CBWT	CBWT	WINNIPEG	MB	27741	63886
157	KOAT	2002	KOAT	KOAT	ALBUQUERQUE	NM	26846	41431
158	KAZT	2002	KAZT	KAZT	PRESCOTT	AZ	26472	268041

159	KDFW	2002	KDFW	KDFW	DALLAS	TX	26018	37196
160	WJAL	2002	WJAL	WJAL	HAGERSTOWN	MD	25725	44291
161	WCTX	2002	WCTX	WCTX	NEW HAVEN	CT	25578	37008
162	WPCB	2002	WPCB	WPCB	GREENSBURG	PA	25348	67898
163	WLUK	2002	WLUK	WLUK	GREEN BAY	WI	23583	37592
164	WPXX	2002	WPXX	WPXX	MEMPHIS	TN	23433	82785
165	WFXV	2002	WFXV	WFXV	UTICA	NY	23194	33381
166	KTSF	2002	KTSF	KTSF	SAN FRANCISCO	CA	22613	33351
167	WAPK	2002	WAPK	WAPK	KINGSPORT	TN	22156	195011
168	WBPG	2002	WBPG	WBPG	GULF SHORES	AL	19469	41657
169	WHME	2002	WHME	WHME	SOUTH BEND	IN	18633	51964
170	WSVN	2002	WSVN	WSVN	MIAMI	FL	18549	42666
171	WMYO	2002	WMYO	WMYO	SALEM	IN	17623	50448
172	KOKH	2002	KOKH	KOKH	OKLAHOMA CITY	OK	17427	60233
173	WEUX	2002	WEUX	WEUX	CHIPPEWA FALLS	WI	16517	52773
174	WTGS	2002	WTGS	WTGS	HARDEEVILLE	SC	16384	91555
175	WDAF	2002	WDAF	WDAF	KANSAS CITY	MO	16179	46572
176	KABB	2002	KABB	KABB	SAN ANTONIO	TX	15888	44865
177	WBKI	2002	WBKI	WBKI	CAMPBELLSVILLE	KY	15813	34989
178	KSTS	2002	KSTS	KSTS	SAN JOSE	CA	15073	72228
179	KTXA	2002	KTXA	KTXA	FT WORTH	TX	14604	86745
180	WGNT	2002	WGNT	WGNT	PORTSMOUTH	VA	14405	35590
181	WVAH	2002	WVAH	WVAH	CHARLESTON	WV	14301	58258
182	WITI	2002	WITI	WITI	MILWAUKEE	WI	13832	67523
183	KPDX	2002	KPDX	KPDX	VANCOUVER	WA	13431	39898
184	WFFF	2002	WFFF	WFFF	BURLINGTON	VT	13170	38214
185	WVUE	2002	WVUE	WVUE	NEW ORLEANS	LA	12374	40756
186	WCGV	2002	WCGV	WCGV	MILWAUKEE	WI	12355	67480
187	WLMT	2002	WLMT	WLMT	MEMPHIS	TN	12302	51436
188	KTEL	2002	KTEL	KTEL	CARLSBAD	NM	11830	80466
189	KOKI	2002	KOKI	KOKI	TULSA	OK	11332	35183
190	KAUT	2002	KAUT	KAUT	OKLAHOMA CITY	OK	11075	35728
191	KCNS	2002	KCNS	KCNS	SAN FRANCISCO	CA	11070	51599
192	WUCW	2002	WUCW	WUCW	MINNEAPOLIS	MN	11064	47067
193	KXLT	2002	KXLT	KXLT	ROCHESTER	MN	10908	39222
194	WFXS	2002	WFXS	WFXS	WITTENBERG	WI	10883	43703
195	WTTK	2002	WTTK	WTTK	KOKOMO	IN	10785	35987
196	WGTW	2002	WGTW	WGTW	BURLINGTON	NJ	7925	117142
197	WSAH	2002	WSAH	WSAH	BRIDGEPORT	CT	7804	45700
198	WCCU	2002	WCCU	WCCU	URBANA	IL	5179	33820

199	WZTV	2002	WZTV	WZTV	NASHVILLE	TN	4345	31799
200	WTCT	2002	WTCT	WTCT	MARION	IL	2849	53078
							57,567,049	\$ 87,586,118
SUBS								
RANK	MPAA STATIONS NOT IN IPG SURVEY							
36	WEWS	2002	WEWS	WEWS	CLEVELAND	OH	203847	30976
40	WLIO	2002	WLIO	WLIO	LIMA	OH	196360	23215
105	WHDH	2002	WHDH	WHDH	BOSTON	MA	88748	24861
107	WGGB	2002	WGGB	WGGB	SPRINGFIELD	MA	88414	27602
118	KMBC	2002	KMBC	KMBC	KANSAS CITY	MO	78760	27472
120	WITN	2002	WITN	WITN	WASHINGTON	NC	78410	26509
137	WAFB	2002	WAFB	WAFB	BATON ROUGE	LA	72519	31530
153	KSL	2002	KSL	KSL	SALT LAKE CITY	UT	62830	27451
158	WKYT	2002	WKYT	WKYT	LEXINGTON	KY	57685	30598
183	WWLP	2002	WWLP	WWLP	SPRINGFIELD	MA	47019	13935
192	KFOR	2002	KFOR	KFOR	OKLAHOMA CITY	OK	44667	28904
195	KWTV	2002	KWTV	KWTV	OKLAHOMA CITY	OK	44373	29191
196	KMGH	2002	KMGH	KMGH	DENVER	CO	43925	29244
212	KATU	2002	KATU	KATU	PORTLAND	OR	41605	29048
221	WCFT	2002	WCFT	WCFT	TUSCALOOSA	AL	39774	28754
248	WNWO	2002	WNWO	WNWO	TOLEDO	OH	34687	6889
248	KMTV	2002	KMTV	KMTV	OMAHA	NE	34982	17986
256	KETV	2002	KETV	KETV	OMAHA	NE	33651	21013
310	WIBW	2002	WIBW	WIBW	TOPEKA	KS	25926	10781
379	KGW	2002	KGW	KGW	PORTLAND	OR	16548	13683
529	WTBS	2002	WTBS	WTBS	ATLANTA	GA	9426	9186
771	KUVS	2002	KUVS	KUVS	MODESTO	CA	2261	1332

	wbr call sign	YEAR	CALL-DIGI	CALLSIGN	CALL-CITY	CALL- STATE	Average Distant Subscribers	TOTAL DISTANT FEES- GEN
1	WGNA	2003	WGN	WGN	CHICAGO	IL	32772731	58590816
2	WPIX	2003	WPIX	WPIX	NEW YORK	NY	2119419	3795775
3	CBUT	2003	CBUT	CBUT	VANCOUVER	BC	936318	1483067
4	WUAB	2003	WUAB	WUAB	LORAIN	OH	815198	1353160
5	KTLA	2003	KTLA	KTLA	LOS ANGELES	CA	592342	936503
6	WNBC	2003	WNBC	WNBC	NEW YORK	NY	570415	395522
7	CKSH	2003	CKSH	CKSH	SHERBROOKE	QU	524530	596530
8	WSBK	2003	WSBK	WSBK	BOSTON	MA	515055	897658
9	WPHL	2003	WPHL	WPHL	PHILADELPHIA	PA	501558	645929
10	WWOR	2003	WWOR	WWOR	SECAUCUS	NJ	445760	771005
11	CBET	2003	CBET	CBET	WINDSOR	ON	414945	603336
12	KTNC	2003	KTNC	KTNC	CONCORD	CA	412051	547861
13	WKBD	2003	WKBD	WKBD	DETROIT	MI	368641	507619
14	WSEE	2003	WSEE	WSEE	ERIE	PA	364403	312277
15	WPSG	2003	WPSG	WPSG	PHILADELPHIA	PA	347987	619346
16	WKRN	2003	WKRN	WKRN	NASHVILLE	TN	341818	281439
17	WIS	2003	WIS	WIS	COLUMBIA	SC	283668	146027
18	WTFX	2003	WTFX	WTFX	PHILADELPHIA	PA	265333	474027
19	WXIX	2003	WXIX	WXIX	NEWPORT	KY	241102	241476
20	KGO	2003	KGO	KGO	SAN FRANCISCO	CA	236071	80026
21	KCAL	2003	KCAL	KCAL	LOS ANGELES	CA	235051	445355
22	CFTO	2003	CFTO	CFTO	TORONTO	ON	219749	270567
23	CBLT	2003	CBLT	CBLT	TORONTO	ON	219749	178749
24	WJZ	2003	WJZ	WJZ	BALTIMORE	MD	207840	149572
25	WBNS	2003	WBNS	WBNS	COLUMBUS	OH	205288	97957
26	WVTV	2003	WVTV	WVTV	MILWAUKEE	WI	196567	311059
27	WNYW	2003	WNYW	WNYW	NEW YORK	NY	187616	322949
28	KCOP	2003	KCOP	KCOP	LOS ANGELES	CA	187342	451796
29	WPVI	2003	WPVI	WPVI	PHILADELPHIA	PA	179857	74478
30	WSB	2003	WSB	WSB	ATLANTA	GA	173737	69824
31	WFAA	2003	WFAA	WFAA	DALLAS	TX	167699	80418
32	CBMT	2003	CBMT	CBMT	MONTREAL	QU	163723	463622
33	KCRA	2003	KCRA	KCRA	SACRAMENTO	CA	158873	67301
34	WLTV	2003	WLTV	WLTV	MIAMI	FL	158301	382727
35	WCAU	2003	WCAU	WCAU	PHILADELPHIA	PA	155713	67536
36	WDIV	2003	WDIV	WDIV	DETROIT	MI	155308	114339
37	WISN	2003	WISN	WISN	MILWAUKEE	WI	153997	212019
38	WTMJ	2003	WTMJ	WTMJ	MILWAUKEE	WI	147024	62588

	wbr call sign	YEAR	CALL-DIGI	CALLSIGN	CALL-CITY	CALL-STATE	Average Distant Subscribers	TOTAL DISTANT FEES-GEN
1	WGNA	2003	WGN	WGN	CHICAGO	IL	32772731	58590816
2	WPIX	2003	WPIX	WPIX	NEW YORK	NY	2119419	3795775
3	CBUT	2003	CBUT	CBUT	VANCOUVER	BC	936318	1483067
4	WUAB	2003	WUAB	WUAB	LORAIN	OH	815198	1353160
5	KTLA	2003	KTLA	KTLA	LOS ANGELES	CA	592342	936503
6	WNBC	2003	WNBC	WNBC	NEW YORK	NY	570415	395522
7	CKSH	2003	CKSH	CKSH	SHERBROOKE	QU	524530	596530
8	WSBK	2003	WSBK	WSBK	BOSTON	MA	515055	897658
9	WPHL	2003	WPHL	WPHL	PHILADELPHIA	PA	501558	645929
10	WWOR	2003	WWOR	WWOR	SECAUCUS	NJ	445760	771005
11	CBET	2003	CBET	CBET	WINDSOR	ON	414945	603336
12	KTNC	2003	KTNC	KTNC	CONCORD	CA	412051	547861
13	WKBD	2003	WKBD	WKBD	DETROIT	MI	368641	507619
14	WSEE	2003	WSEE	WSEE	ERIE	PA	364403	312277
15	WPSG	2003	WPSG	WPSG	PHILADELPHIA	PA	347987	619346
16	WKRN	2003	WKRN	WKRN	NASHVILLE	TN	341818	281439
17	WIS	2003	WIS	WIS	COLUMBIA	SC	283668	146027
18	WTFX	2003	WTFX	WTFX	PHILADELPHIA	PA	265333	474027
19	WXIX	2003	WXIX	WXIX	NEWPORT	KY	241102	241476
20	KGO	2003	KGO	KGO	SAN FRANCISCO	CA	236071	80026
21	KCAL	2003	KCAL	KCAL	LOS ANGELES	CA	235051	445355
22	CFTO	2003	CFTO	CFTO	TORONTO	ON	219749	270567
23	CBLT	2003	CBLT	CBLT	TORONTO	ON	219749	178749
24	WJZ	2003	WJZ	WJZ	BALTIMORE	MD	207840	149572
25	WBNS	2003	WBNS	WBNS	COLUMBUS	OH	205288	97957
26	WVTV	2003	WVTV	WVTV	MILWAUKEE	WI	196567	311059
27	WNYW	2003	WNYW	WNYW	NEW YORK	NY	187616	322949
28	KCOP	2003	KCOP	KCOP	LOS ANGELES	CA	187342	451796
29	WPVI	2003	WPVI	WPVI	PHILADELPHIA	PA	179857	74478
30	WSB	2003	WSB	WSB	ATLANTA	GA	173737	69824
31	WFAA	2003	WFAA	WFAA	DALLAS	TX	167699	80418
32	CBMT	2003	CBMT	CBMT	MONTREAL	QU	163723	463622
33	KCRA	2003	KCRA	KCRA	SACRAMENTO	CA	158873	67301
34	WLTV	2003	WLTV	WLTV	MIAMI	FL	158301	382727
35	WCAU	2003	WCAU	WCAU	PHILADELPHIA	PA	155713	67536
36	WDIV	2003	WDIV	WDIV	DETROIT	MI	155308	114339
37	WISN	2003	WISN	WISN	MILWAUKEE	WI	153997	212019
38	WTMJ	2003	WTMJ	WTMJ	MILWAUKEE	WI	147024	62588

39	WXIA	2003	WXIA	WXIA	ATLANTA	GA	138676	62834
40	WSFL	2003	WSFL	WSFL	MIAMI	FL	134313	364298
41	KYW	2003	KYW	KYW	PHILADELPHIA	PA	133732	93610
42	CKWS	2003	CKWS	CKWS	KINGSTON	ON	132941	271018
43	KICU	2003	KICU	KICU	SAN JOSE	CA	131890	112684
44	WBAL	2003	WBAL	WBAL	BALTIMORE	MD	127536	88790
45	KNBC	2003	KNBC	KNBC	LOS ANGELES	CA	125825	46554
46	KTVU	2003	KTVU	KTVU	OAKLAND	CA	125130	111340
47	KATV	2003	KATV	KATV	LITTLE ROCK	AR	122667	92576
48	WUSA	2003	WUSA	WUSA	WASHINGTON	DC	119971	64991
49	WRIC	2003	WRIC	WRIC	PETERSBURG	VA	114554	93620
50	WSYX	2003	WSYX	WSYX	COLUMBUS	OH	112917	40002
51	KWGN	2003	KWGN	KWGN	DENVER	CO	111973	211583
52	KARK	2003	KARK	KARK	LITTLE ROCK	AR	111162	65416
53	KDKA	2003	KDKA	KDKA	PITTSBURGH	PA	108119	45186
54	WMLW	2003	WMLW-	WMLW-	MILWAUKEE	WI	107727	120256
55	WBZ	2003	WBZ	WBZ	BOSTON	MA	102777	45088
56	WCVB	2003	WCVB	WCVB	BOSTON	MA	102553	65481
57	WDCA	2003	WDCA	WDCA	WASHINGTON	DC	101194	153110
58	WKYT	2003	WKYT	WKYT	LEXINGTON	KY	100429	56830
59	KABC	2003	KABC	KABC	LOS ANGELES	CA	98874	32721
60	WTAE	2003	WTAE	WTAE	PITTSBURGH	PA	94022	43337
61	WWBT	2003	WWBT	WWBT	RICHMOND	VA	93526	70051
62	KBWB	2003	KBWB	KBWB	SAN FRANCISCO	CA	93414	63150
63	KTHV	2003	KTHV	KTHV	LITTLE ROCK	AR	92934	46632
64	WIAT	2003	WIAT	WIAT	BIRMINGHAM	AL	91361	57056
65	WITN	2003	WITN	WITN	WASHINGTON	NC	86820	35546
66	KRON	2003	KRON	KRON	SAN FRANCISCO	CA	86553	48761
67	WTTG	2003	WTTG	WTTG	WASHINGTON	DC	82576	107128
68	WGCL	2003	WGCL	WGCL	ATLANTA	GA	82300	114431
69	WBRZ	2003	WBRZ	WBRZ	BATON ROUGE	LA	81576	67033
70	KPLR	2003	KPLR	KPLR	ST LOUIS	MO	80619	141627
71	WTVD	2003	WTVD	WTVD	DURHAM	NC	79162	69947
72	KMSP	2003	KMSP	KMSP	MINNEAPOLIS	MN	77100	120123
73	WFQX	2003	WFQX	WFQX	CADILLAC	MI	77046	195688
74	WBQC	2003	WBQC-	WBQC-	CINCINNATI	OH	75632	73927
75	WPXI	2003	WPXI	WPXI	PITTSBURGH	PA	75138	40454
76	KCNC	2003	KCNC	KCNC	DENVER	CO	73581	48046
77	WTVE	2003	WTVE	WTVE	READING	PA	72841	81871
78	KSDK	2003	KSDK	KSDK	ST LOUIS	MO	70623	38485

39	WXIA	2003	WXIA	WXIA	ATLANTA	GA	138676	62834
40	WSFL	2003	WSFL	WSFL	MIAMI	FL	134313	364298
41	KYW	2003	KYW	KYW	PHILADELPHIA	PA	133732	93610
42	CKWS	2003	CKWS	CKWS	KINGSTON	ON	132941	271018
43	KICU	2003	KICU	KICU	SAN JOSE	CA	131890	112684
44	WBAL	2003	WBAL	WBAL	BALTIMORE	MD	127536	88790
45	KNBC	2003	KNBC	KNBC	LOS ANGELES	CA	125825	46554
46	KTVU	2003	KTVU	KTVU	OAKLAND	CA	125130	111340
47	KATV	2003	KATV	KATV	LITTLE ROCK	AR	122667	92576
48	WUSA	2003	WUSA	WUSA	WASHINGTON	DC	119971	64991
49	WRIC	2003	WRIC	WRIC	PETERSBURG	VA	114554	93620
50	WSYX	2003	WSYX	WSYX	COLUMBUS	OH	112917	40002
51	KWGN	2003	KWGN	KWGN	DENVER	CO	111973	211583
52	KARK	2003	KARK	KARK	LITTLE ROCK	AR	111162	65416
53	KDKA	2003	KDKA	KDKA	PITTSBURGH	PA	108119	45186
54	WMLW	2003	WMLW-	WMLW-	MILWAUKEE	WI	107727	120256
55	WBZ	2003	WBZ	WBZ	BOSTON	MA	102777	45088
56	WCVB	2003	WCVB	WCVB	BOSTON	MA	102553	65481
57	WDCA	2003	WDCA	WDCA	WASHINGTON	DC	101194	153110
58	WKYT	2003	WKYT	WKYT	LEXINGTON	KY	100429	56830
59	KABC	2003	KABC	KABC	LOS ANGELES	CA	98874	32721
60	WTAE	2003	WTAE	WTAE	PITTSBURGH	PA	94022	43337
61	WWBT	2003	WWBT	WWBT	RICHMOND	VA	93526	70051
62	KBWB	2003	KBWB	KBWB	SAN FRANCISCO	CA	93414	63150
63	KTHV	2003	KTHV	KTHV	LITTLE ROCK	AR	92934	46632
64	WIAT	2003	WIAT	WIAT	BIRMINGHAM	AL	91361	57056
65	WITN	2003	WITN	WITN	WASHINGTON	NC	86820	35546
66	KRON	2003	KRON	KRON	SAN FRANCISCO	CA	86553	48761
67	WTTG	2003	WTTG	WTTG	WASHINGTON	DC	82576	107128
68	WGCL	2003	WGCL	WGCL	ATLANTA	GA	82300	114431
69	WBRZ	2003	WBRZ	WBRZ	BATON ROUGE	LA	81576	67033
70	KPLR	2003	KPLR	KPLR	ST LOUIS	MO	80619	141627
71	WTVD	2003	WTVD	WTVD	DURHAM	NC	79162	69947
72	KMSP	2003	KMSP	KMSP	MINNEAPOLIS	MN	77100	120123
73	WFQX	2003	WFQX	WFQX	CADILLAC	MI	77046	195688
74	WBQC	2003	WBQC-	WBQC-	CINCINNATI	OH	75632	73927
75	WPXI	2003	WPXI	WPXI	PITTSBURGH	PA	75138	40454
76	KCNC	2003	KCNC	KCNC	DENVER	CO	73581	48046
77	WTVE	2003	WTVE	WTVE	READING	PA	72841	81871
78	KSDK	2003	KSDK	KSDK	ST LOUIS	MO	70623	38485

79	WLYH	2003	WLYH	WLYH	LEBANON	PA	68897	320852
80	WBRC	2003	WBRC	WBRC	BIRMINGHAM	AL	68883	75963
81	CHLT	2003	CHLT	CHLT	SHERBROOKE	QU	68265	94325
82	WPMY	2003	WPMY	WPMY	PITTSBURGH	PA	67742	131709
83	KSHB	2003	KSHB	KSHB	KANSAS CITY	MO	64640	86469
84	WFTC	2003	WFTC	WFTC	MINNEAPOLIS	MN	63596	258512
85	KCBS	2003	KCBS	KCBS	LOS ANGELES	CA	63221	52536
86	WLKY	2003	WLKY	WLKY	LOUISVILLE	KY	63212	52495
87	KIRO	2003	KIRO	KIRO	SEATTLE	WA	62692	93741
88	CBFT	2003	CBFT	CBFT	MONTREAL	QU	62061	173686
89	WVTM	2003	WVTM	WVTM	BIRMINGHAM	AL	61189	36387
90	KWTV	2003	KWTV	KWTV	OKLAHOMA CITY	OK	60891	34966
91	WFLD	2003	WFLD	WFLD	CHICAGO	IL	60040	89298
92	KTXL	2003	KTXL	KTXL	SACRAMENTO	CA	59909	91384
93	WHBQ	2003	WHBQ	WHBQ	MEMPHIS	TN	59861	54082
94	WALA	2003	WALA	WALA	MOBILE	AL	58957	150017
95	KSTW	2003	KSTW	KSTW	TACOMA	WA	58034	118297
96	KUSI	2003	KUSI	KUSI	SAN DIEGO	CA	56045	51875
97	WBGT	2003	WBGT-	WBGT-	ROCHESTER	NY	55818	78045
98	KRMZ	2003	KMAS	KRMZ	STEAMBOAT SPRING	CO	55107	152471
99	WPGH	2003	WPGH	WPGH	PITTSBURGH	PA	53772	66199
100	WYTV	2003	WYTV	WYTV	YOUNGSTOWN	OH	53639	38724
101	KXTX	2003	KXTX	KXTX	DALLAS	TX	53472	100674
102	WNCT	2003	WNCT	WNCT	GREENVILLE	NC	52433	32920
103	WGAL	2003	WGAL	WGAL	LANCASTER	PA	50649	48978
104	WTAJ	2003	WTAJ	WTAJ	ALTOONA	PA	49454	36704
105	WDTA	2003	WDTA-	WDTA-	FAYETTEVILLE	GA	48814	130781
106	KCSO	2003	KCSO-	KCSO-	SACRAMENTO	CA	48300	90682
107	WNYS	2003	WNYS	WNYS	SYRACUSE	NY	48162	74636
108	KUSA	2003	KUSA	KUSA	DENVER	CO	47801	32518
109	CIVT	2003	CIVT	CIVT	VANCOUVER	BC	47193	75395
110	WDRB	2003	WDRB	WDRB	LOUISVILLE	KY	44401	171840
111	WBNX	2003	WBNX	WBNX	AKRON	OH	44356	44355
112	WVLA	2003	WVLA	WVLA	BATON ROUGE	LA	44220	35751
113	WPMT	2003	WPMT	WPMT	YORK	PA	43780	265773
114	WFXT	2003	WFXT	WFXT	BOSTON	MA	43728	162900
115	KOIN	2003	KOIN	KOIN	PORTLAND	OR	42469	39016
116	WAGA	2003	WAGA	WAGA	ATLANTA	GA	40621	58241
117	CHCH	2003	CHCH	CHCH	HAMILTON	ON	39620	132320
118	WPCW	2003	WPCW	WPCW	JEANNETTE	PA	39543	47104

79	WLYH	2003	WLYH	WLYH	LEBANON	PA	68897	320852
80	WBRC	2003	WBRC	WBRC	BIRMINGHAM	AL	68883	75963
81	CHLT	2003	CHLT	CHLT	SHERBROOKE	QU	68265	94325
82	WPMY	2003	WPMY	WPMY	PITTSBURGH	PA	67742	131709
83	KSHB	2003	KSHB	KSHB	KANSAS CITY	MO	64640	86469
84	WFTC	2003	WFTC	WFTC	MINNEAPOLIS	MN	63596	258512
85	KCBS	2003	KCBS	KCBS	LOS ANGELES	CA	63221	52536
86	WLKY	2003	WLKY	WLKY	LOUISVILLE	KY	63212	52495
87	KIRO	2003	KIRO	KIRO	SEATTLE	WA	62692	93741
88	CBFT	2003	CBFT	CBFT	MONTREAL	QU	62061	173686
89	WVTM	2003	WVTM	WVTM	BIRMINGHAM	AL	61189	36387
90	KWTV	2003	KWTV	KWTV	OKLAHOMA CITY	OK	60891	34966
91	WFLD	2003	WFLD	WFLD	CHICAGO	IL	60040	89298
92	KTXL	2003	KTXL	KTXL	SACRAMENTO	CA	59909	91384
93	WHBQ	2003	WHBQ	WHBQ	MEMPHIS	TN	59861	54082
94	WALA	2003	WALA	WALA	MOBILE	AL	58957	150017
95	KSTW	2003	KSTW	KSTW	TACOMA	WA	58034	118297
96	KUSI	2003	KUSI	KUSI	SAN DIEGO	CA	56045	51875
97	WBGT	2003	WBGT-	WBGT-	ROCHESTER	NY	55818	78045
98	KRMZ	2003	KMAS	KRMZ	STEAMBOAT SPRING	CO	55107	152471
99	WPGH	2003	WPGH	WPGH	PITTSBURGH	PA	53772	66199
100	WYTV	2003	WYTV	WYTV	YOUNGSTOWN	OH	53639	38724
101	KXTX	2003	KXTX	KXTX	DALLAS	TX	53472	100674
102	WNCT	2003	WNCT	WNCT	GREENVILLE	NC	52433	32920
103	WGAL	2003	WGAL	WGAL	LANCASTER	PA	50649	48978
104	WTAJ	2003	WTAJ	WTAJ	ALTOONA	PA	49454	36704
105	WDTA	2003	WDTA-	WDTA-	FAYETTEVILLE	GA	48814	130781
106	KCSO	2003	KCSO-	KCSO-	SACRAMENTO	CA	48300	90682
107	WNYS	2003	WNYS	WNYS	SYRACUSE	NY	48162	74636
108	KUSA	2003	KUSA	KUSA	DENVER	CO	47801	32518
109	CIVT	2003	CIVT	CIVT	VANCOUVER	BC	47193	75395
110	WDRB	2003	WDRB	WDRB	LOUISVILLE	KY	44401	171840
111	WBNX	2003	WBNX	WBNX	AKRON	OH	44356	44355
112	WVLA	2003	WVLA	WVLA	BATON ROUGE	LA	44220	35751
113	WPMT	2003	WPMT	WPMT	YORK	PA	43780	265773
114	WFXT	2003	WFXT	WFXT	BOSTON	MA	43728	162900
115	KOIN	2003	KOIN	KOIN	PORTLAND	OR	42469	39016
116	WAGA	2003	WAGA	WAGA	ATLANTA	GA	40621	58241
117	CHCH	2003	CHCH	CHCH	HAMILTON	ON	39620	132320
118	WPCW	2003	WPCW	WPCW	JEANNETTE	PA	39543	47104

MPAA Sample Stations in IPG Stations List – 2003

Organized according to Average Distant Subscribers

119	KOMO	2003	KOMO	KOMO	SEATTLE	WA	39169	33235
120	WDCW	2003	WDCW	WDCW	WASHINGTON	DC	38671	120246
121	KATU	2003	KATU	KATU	PORTLAND	OR	38581	35464
122	KBCW	2003	KBCW	KBCW	SAN FRANCISCO	CA	38543	167679
123	WRGB	2003	WRGB	WRGB	SCHENECTADY	NY	37714	41505
124	WLVI	2003	WLVI	WLVI	CAMBRIDGE	MA	37691	44402
125	WZTV	2003	WZTV	WZTV	NASHVILLE	TN	37245	46863
126	WICU	2003	WICU	WICU	ERIE	PA	36584	40422
127	WMYD	2003	WMYD	WMYD	DETROIT	MI	34306	79552
128	WDBJ	2003	WDBJ	WDBJ	ROANOKE	VA	33907	70489
129	WABM	2003	WABM	WABM	BIRMINGHAM	AL	33687	40059
130	WUHF	2003	WUHF	WUHF	ROCHESTER	NY	33327	43346
131	KABB	2003	KABB	KABB	SAN ANTONIO	TX	31909	96740
132	WCHS	2003	WCHS	WCHS	CHARLESTON	WV	31715	31635
133	WTTE	2003	WTTE	WTTE	COLUMBUS	OH	30380	39924
134	KPXN	2003	KPXN	KPXN	SAN BERNARDINO	CA	30208	50769
135	WTOV	2003	WTOV	WTOV	STEUBENVILLE	OH	29997	119043
136	KBNT	2003	KBNT-	KBNT-	SAN DIEGO	CA	29981	50001
137	WZMY	2003	WZMY	WZMY	DERRY	NH	29834	86586
138	WXTV	2003	WXTV	WXTV	PATERSON	NJ	29766	46684
139	WSCV	2003	WSCV	WSCV	FT LAUDERDALE	FL	29264	57178
140	WXIN	2003	WXIN	WXIN	INDIANAPOLIS	IN	28785	104588
141	WPCB	2003	WPCB	WPCB	GREENSBURG	PA	28782	80711
142	WXPX	2003	WXPX	WXPX	BRADENTON	FL	28761	36049
143	KDFW	2003	KDFW	KDFW	DALLAS	TX	28523	56734
144	KPTV	2003	KPTV	KPTV	PORTLAND	OR	28234	81297
145	WTTV	2003	WTTV	WTTV	BLOOMINGTON	IN	28226	35174
146	WSLS	2003	WSLS	WSLS	ROANOKE	VA	28214	46930
147	WBOC	2003	WBOC	WBOC	SALISBURY	MD	27768	30151
148	KOAT	2003	KOAT	KOAT	ALBUQUERQUE	NM	27639	41558
149	KTVK	2003	KTVK	KTVK	PHOENIX	AZ	27468	80224
150	KPDX	2003	KPDX	KPDX	VANCOUVER	WA	27423	87756
151	WUNI	2003	WUNI	WUNI	WORCESTER	MA	27085	34138
152	WJAL	2003	WJAL	WJAL	HAGERSTOWN	MD	27047	62801
153	KCPO	2003	KCPO-	KCPO-	SIOUX FALLS	SD	26887	46699
154	CBWT	2003	CBWT	CBWT	WINNIPEG	MB	26057	50450
155	WFXP	2003	WFXP	WFXP	ERIE	PA	26040	56995
156	WQRF	2003	WQRF	WQRF	ROCKFORD	IL	24821	39718
157	WTTK	2003	WTTK	WTTK	KOKOMO	IN	23070	44192
158	WWPX	2003	WWPX	WWPX	MARTINSBURG	WV	22819	32389

MPAA Sample Stations in IPG Stations List – 2003

Organized according to Average Distant Subscribers

199	CIII	2003	CIII	CIII	TORONTO	ON	3479	58205
200	KCNS	2003	KCNS	KCNS	SAN FRANCISCO	CA	3229	31591
							54,357,783	\$ 89,504,245
SUBS								
RANK	MPAA STATIONS NOT IN IPG SURVEY							
92	WHDH	2003	WHDH	WHDH	BOSTON	MA	91,072	22,940
107	KMBC	2003	KMBC	KMBC	KANSAS CITY	MO	77,158	28,719
112	WCMH	2003	WCMH	WCMH	COLUMBUS	OH	74,892	23,352
117	WMC	2003	WMC	WMC	MEMPHIS	TN	69,875	19,079
120	WRC	2003	WRC	WRC	WASHINGTON	DC	68,277	27,378
138	WGME	2003	WGME	WGME	PORTLAND	ME	60,387	16,456
143	WSMV	2003	WSMV	WSMV	NASHVILLE	TN	59,684	27,085
145	WBBM	2003	WBBM	WBBM	CHICAGO	IL	58,570	28,820
146	WTVF	2003	WTVF	WTVF	NASHVILLE	TN	58,485	19,602
148	WAFB	2003	WAFB	WAFB	BATON ROUGE	LA	57,495	23,577
149	KFOR	2003	KFOR	KFOR	OKLAHOMA CITY	OK	56,969	28,524
154	KSL	2003	KSL	KSL	SALT LAKE CITY	UT	54,708	24,077
162	WMAR	2003	WMAR	WMAR	BALTIMORE	MD	51,148	25,913
163	KTRK	2003	KTRK	KTRK	HOUSTON	TX	50,971	20,045
165	WTVQ	2003	WTVQ	WTVQ	LEXINGTON	KY	50,929	17,439
181	WLEX	2003	WLEX	WLEX	LEXINGTON	KY	46,804	14,512
193	WCCO	2003	WCCO	WCCO	MINNEAPOLIS	MN	43,563	15,830
204	WPTY	2003	WPTY	WPTY	MEMPHIS	TN	40,742	7,939
225	KTVT	2003	KTVT	KTVT	FT WORTH	TX	37,481	18,897
266	KMGH	2003	KMGH	KMGH	DENVER	CO	30,652	17,032
591	WTBS	2003	WTBS	WTBS	ATLANTA	GA	6,282	12,136

EXHIBIT 18

Comparison of IPG-selected stations vs. MPAA-sampled stations

## of Stations sampled				
	2000	2001	2002	2003
IPG study	223	231	200	200
MPAA study	81	97	122	125
IPG % greater than MPAA	175%	138%	64%	60%
## of Distant Subscribers covered by selected stations, and % of Total				
	2000	2001	2002	2003
IPG study	57,757,468	58,098,784	57,567,049	54,357,783
	83.1%	83.3%	79.9%	78.4%
MPAA study	50,737,756	51,605,348	53,050,091	50,549,611
	73.0%	74.0%	73.6%	72.9%
IPG ## greater than MPAA	7,019,712	6,493,436	4,516,958	3,808,172
## of Fees Generated by selected stations, and % of Total				
	2000	2001	2002	2003
IPG study	\$ 80,504,364	\$ 82,751,833	\$ 87,586,118	\$ 89,504,245
	93.4%	93.2%	91.5%	91.6%
MPAA study	\$ 71,180,209	\$ 73,784,403	\$ 78,168,612	\$ 80,780,328
	82.6%	83.1%	81.6%	82.7%
IPG ## greater than MPAA	\$ 9,324,155	\$ 8,967,430	\$ 9,417,506	\$ 8,723,917

Comparison of IPG-selected stations vs. MPAA-sampled stations

## of Distinct Program Titles appearing in surveyed stations				
	2000	2001	2002	2003
IPG study	17,655	18,291	15,863	14,481
MPAA study	3,034	7,606	8,040	8,012
IPG ## greater than MPAA	14,621	10,685	7,823	6,469

EXHIBIT 19

Sum Weighted Values - IPG (Program Suppliers)

Phase I Category	Year	IPG Claimants					
		wvs	wvf				
Program Suppliers	2000	512,394,977,933	731,968,786,883				
	2001	479,589,076,612	734,461,108,571				
	2002	334,098,635,339	530,172,296,830				
	2003	268,639,018,954	467,416,254,380				
Phase I Category	Year	MCAA Claimants					
		wvs	wvf				
Program Suppliers	2000	3,886,887,490,835	5,578,763,652,332				
	2001	4,505,656,985,313	6,766,585,671,426				
	2002	4,499,749,668,890	7,160,609,416,859				
	2003	3,981,981,864,136	6,904,422,486,013				
		IPG Claimants % of Aggregate					
		wvs	wvf	wvs&f			
Program Suppliers	2000	11.65%	11.60%	11.62%			
	2001	9.62%	9.79%	9.71%			
	2002	6.91%	6.89%	6.90%			
	2003	6.32%	6.34%	6.33%			

Sum Weighted Values - IPG (Program Suppliers)

Phase I Category	Year	Conflicting Claims						
		wvs	wvf					
Program Suppliers	2000	233,584,516,904	323,987,646,211					
	2001	273,101,447,411	423,639,052,675					
	2002	140,086,991,826	214,818,122,411					
	2003	114,557,729,836	201,736,561,823					
Phase I Category	Year	Conflicting Claims - % of Aggregate						
		wvs	wvf	wvs&f				
Program Suppliers	2000	5.31%	5.13%	5.22%				
	2001	5.48%	5.65%	5.56%				
	2002	2.90%	2.79%	2.85%				
	2003	2.70%	2.74%	2.72%				
Phase I Category	Year	IPG Non-Conflicting Claims - % of Aggregate						
		wvs	wvf	wvs&f				
Program Suppliers	2000	6.34%	6.46%	6.40%				
	2001	4.14%	4.14%	4.14%				
	2002	4.01%	4.10%	4.06%				
	2003	3.62%	3.60%	3.61%				

EXHIBIT 20

Sum Weighted Values - IPG (Program Suppliers)

Phase I Category	Year	IPG Claimants					
		wvs	wvf				
Program Suppliers	2000	512,394,977,933	731,968,786,883				
	2001	479,589,076,612	734,461,108,571				
	2002	334,098,635,339	530,172,296,830				
	2003	268,639,018,954	467,416,254,380				
Phase I Category	Year	MCAA Claimants					
		wvs	wvf				
Program Suppliers	2000	3,589,544,726,223	5,204,425,055,736				
	2001	3,617,839,554,886	5,484,826,061,608				
	2002	3,570,097,814,223	5,813,506,256,551				
	2003	3,426,679,889,433	6,018,428,641,157				
		IPG Claimants % of Aggregate					
		wvs	wvf	wvs&f			
Program Suppliers	2000	12.49%	12.33%	12.41%			
	2001	11.70%	11.81%	11.76%			
	2002	8.56%	8.36%	8.46%			
	2003	7.27%	7.21%	7.24%			

Sum Weighted Values - IPG (Program Suppliers)

Phase I Category	Year	Conflicting Claims						
		wvs	wvf					
Program Suppliers	2000	194,802,271,794	281,322,680,768					
	2001	170,222,682,522	266,409,521,871					
	2002	89,784,681,086	131,285,622,951					
	2003	114,068,796,151	200,864,058,909					
Phase I Category	Year	Conflicting Claims - % of Aggregate						
		wvs	wvf	wvs&f				
Program Suppliers	2000	4.75%	4.74%	4.74%				
	2001	4.15%	4.28%	4.22%				
	2002	2.30%	2.07%	2.18%				
	2003	3.09%	3.10%	3.09%				
Phase I Category	Year	IPG Non-Conflicting Claims - % of Aggregate						
		wvs	wvf	wvs&f				
Program Suppliers	2000	7.74%	7.59%	7.67%				
	2001	7.55%	7.53%	7.54%				
	2002	6.26%	6.29%	6.27%				
	2003	4.18%	4.11%	4.15%				

EXHIBIT 21

of Claimed Broadcasts - IPG (Program Suppliers)

Phase I Category	Year	## of Claimed Broadcasts			
		IPG	MPAA		
Program Suppliers	2000	125,756	11.26%	991,491	88.74%
	2001	110,440	9.69%	1,029,776	90.31%
	2002	76,253	7.95%	883,254	92.05%
	2003	69,223	7.66%	834,206	92.34%

EXHIBIT 22

of Claimed Broadcasts - IPG (Program Suppliers)

Phase I Category	Year	## of Claimed Broadcasts						
		IPG	MPAA					
Program Suppliers	2000	125,756	12.25%	900,599	87.75%			
	2001	110,440	11.56%	844,839	88.44%			
	2002	76,253	10.07%	680,736	89.93%			
	2003	69,223	8.95%	704,641	91.05%			