

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

_____))
In the Matter of))
) Docket No. 2010-6 CRB CD 2008
Distribution of the))
2008 Cable Royalty Funds))
_____)

Comments of Devotional Claimants

On behalf of the Devotional Claimants,¹ we hereby submit these comments in connection with Notice announcing partial Phase I settlement and soliciting comments on motion for partial distribution published at 75 Fed. Reg. 66798 (October 29, 2010) (“Notice”).

I. Motion for Partial Distribution and Comments of Phase I Parties

The Devotional Claimants joined in the filing of the Motion for Partial Distribution (“Motion”) and herein reiterate their support for it. The Devotional Claimants also have joined in and endorse the “Comments of The Phase I Parties” (“Comments of Phase I Parties”) submitted separately today. By both documents, the Devotional Claimants join with the other Phase I Parties to assert that there is no reasonable objection to the partial distribution as requested in the Motion.

¹ The Devotional Claimants joining in these comments are Amazing Facts, Inc.; American Religious Town Hall Meeting, Inc.; Billy Graham Evangelistic Association; Catholic Communications Corp.; The Christian Broadcasting Network, Inc.; Coral Ridge Ministries Media, Inc.; Cottonwood Christian Center; Crenshaw Christian Center; Crystal Cathedral Ministries; Evangelical Lutheran Church in America; Faith for Today; Family Worship Center Church; In Touch Ministries, Inc.; International Fellowship of Christians & Jews, Inc.; It Is Written; John Hagee Ministries, Inc; Joel Osteen Ministries; Joyce Meyer Ministries; Liberty Broadcasting Network; Messsianic Vision, Inc.; Oral Roberts Evangelistic Association, Inc.; RBC Ministries; Rhema Bible Church; Ron Phillips Ministries; Speak the Word Church International; The Potter’s House of Dallas, Inc.; Zola Levitt Ministries, Inc.

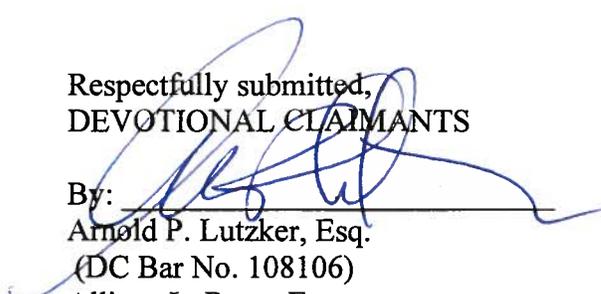
II. Phase I

As noted in the Comments of Phase I Parties, there is no settlement of Phase I claims for 2008. While the absence of such a settlement does not preclude grant of the motion, the Devotional Claimants cannot predict the likelihood of a settlement and therefore believe that a Phase I proceeding may be needed to resolve all Phase I claims. In the event a Phase I proceeding is initiated, Devotional Claimants may assert a claim of 10% or less of the royalty pool.

III. Phase II

Regarding Phase II, there are no settlements of any claims in the religious programming category. The Devotional Claimants believe that a settlement among the claimants listed in Footnote 1 is likely. To the extent there are other parties in the Phase II category, the Devotional Claimants are not in a position to determine whether a settlement of their claims is possible, and thus a Phase II proceeding may be necessary. The Devotional Claimants further believe that the potential amount in controversy from any other religious program owners' claims would be less than 50% of the religious program category funds.

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DEVOTIONAL CLAIMANTS

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November 24, 2008

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of November, 2010, a copy of the foregoing Comments of the Devotional Claimants for Partial Distribution of the 2008 Cable Royalty Funds was sent by Federal Express to the individual listed below:

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