

**Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.**

In the Matter of)	
)	
Distribution of the 2008)	Docket No. 2010-7 CRB SD 2008
Satellite Royalty Funds)	
)	

**COMMENTS OF THE BROADCASTER CLAIMANTS GROUP
REGARDING MOTION FOR PARTIAL DISTRIBUTION
OF 2008 SATELLITE FUNDS**

The Broadcaster Claimants Group (“BCG”) files these comments in the above-referenced proceeding in response to the Notice issued by the Copyright Royalty Judges on October 29, 2010. The Notice requests comments on the proposed partial distribution of 2008 satellite funds, as well as on the existence of Phase I and Phase II controversies with respect to the distribution of 2008 satellite funds.

BCG has joined the other Phase I parties in Comments being filed concurrently herewith that address the statutory basis and predicate upon which the parties’ Motion was filed and should be granted. BCG responds below to the further questions posed by the Notice.

A. Existence of Phase I Controversies

With respect to the 2008 satellite funds, BCG believes that Phase I controversies exist at this time between BCG and all other claimants and claimant groups, including Program Suppliers, Joint Sports Claimants, Music Claimants, and Devotional Claimants.

B. Existence of Phase II Controversies

With respect to the Phase II distribution of 2008 satellite royalties within the Broadcaster Claimants Group category, BCG is unaware of any controversy at this time. BCG is aware of the existence of Phase II controversies between broadcaster claimants and other claimants within the Program Suppliers, Devotional, and Music categories. BCG, however, reserves its right to make or withdraw Phase II claims in response to the rulings of the Copyright Royalty Judges, the outcome of the 2008 satellite distribution proceedings, the acquisition of additional evidence, or the filings of additional claimant parties.

C. Conclusion

As a signatory of the Joint Motion for Partial Distribution filed on October 6, 2010, seeking distribution of fifty percent of the 2008 satellite funds, BCG strongly supports distributing those funds, as described in the Motion. BCG believes there can be no reasonable justification for objecting to the distribution of all such amounts. Withholding the remaining fifty percent of the 2008 satellite funds should fully protect all legitimate claims.

BCG respectfully urges the Copyright Royalty Judges to make the partial distribution as requested.

Respectfully submitted,

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November 29, 2010

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November, 2010, a copy of the foregoing Comments of the Broadcaster Claimants Group Regarding Motion for Partial Distribution of 2008 Satellite Funds was sent by e-mail and first class mail to the following:

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