

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)	
)	
Distribution of)	Docket No. 2012-7 CRB SD 1999-2009
1999-2009)	(Phase 2)
<u>Satellite Royalty Funds</u>)	

**DIRECT STATEMENT
OF INDEPENDENT PRODUCERS GROUP**

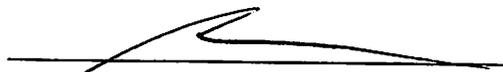
Worldwide Subsidy Group LLC, dba Independent Producers Group (“IPG”), hereby submits an original and five copies, and an electronic copy, of the written testimony of Laura Robinson and Raul Galaz, and the accompanying exhibits, setting forth the direct case of IPG, in connection with Phase II of the 1999-2009 Satellite Royalty Distribution Proceedings.

The value of IPG’s claim, which is more fully explained in the testimony, is dependent on the identity and value of program claims submitted by adverse claimants, and the royalties allocated to the Devotional Programming, Program Suppliers, and Sports Programming categories. Because such information will not be conclusively resolved until the conclusion of these proceedings, the value of IPG’s claim is currently inexact or indeterminable, other than for IPG to make claim for the aggregate of such royalties pending the receipt of information from

adverse claimants as to the retransmitted broadcasts for which they are making claim. As such information is received, IPG will modify its claim accordingly.

Respectfully submitted,

Dated: May 9, 2014



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INDEPENDENT PRODUCERS GROUP EXHIBITS

- Exhibit IPG-1: IPG-represented claimants.
- Exhibit IPG-2: IPG-claimed program list.
- Exhibit IPG-3: Curriculum Vitae of Laura Robinson, Ph.D.
- Exhibit IPG-4: Hours of IPG Claimed titles in 1999-2009 by Distant Subscribers.
- Exhibit IPG-5: Broadcasts by Quarter Hour, 1999-2009.
- Exhibit IPG-6: Weighted Average Distant Subscribers.

CERTIFICATE OF SERVICE

I hereby certify that on this 8 day of May, 2014, a copy of the foregoing was sent by electronic mail to the parties listed on the attached Service List.



Brian Boydston

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TESTIMONY OF RAUL C. GALAZ

I. INTRODUCTION

I am an employee and authorized representative of Independent Producers Group (“IPG”), and the initial founder thereof.¹ Prior to forming IPG, I attended the University of California, Los Angeles and graduated from Stanford Law School in 1988. I practiced law thereafter, specializing in entertainment law, representing independent film and television producers, foreign film distributors and individual artists.

II. HISTORY OF PROCEEDINGS

On August 16, 2013, the Copyright Royalty Judges issued a notice appearing at 78 *Fed. Reg.* 50114, requesting petitions to participate in these proceedings. IPG and several other parties responded, certain of which have since indicated that they have settled their claims in these proceedings.²

¹ In May of 1998, ARTIST COLLECTIONS GROUP, LLC was formed in Los Angeles, California. In March of 1999, WORLDWIDE SUBSIDY GROUP, LLC was formed in Helotes, Texas. On March 12, 2001, WORLDWIDE SUBSIDY GROUP, LLC filed an Assumed Name Certificate in Bexar County, Texas, whereby it represented that it would do business as INDEPENDENT PRODUCERS GROUP (“WSG-Texas”). On November 15, 2002, ARTIST COLLECTIONS GROUP, LLC filed a Certificate of Amendment with the California Secretary of State, changing its name to WORLDWIDE SUBSIDY GROUP, LLC (“WSG-California”). On December 29, 2008, WSG-California was consolidated into WSG-Texas dba Independent Producers Group, and dissolved.

² See **Exhibit IPG-1**, attached hereto, for the list of producers and distributors whose programming is represented by IPG, and whose programming IPG has determined falls in the Devotional Programming, Program Suppliers and Sports Programming categories. In the event

III. IPG THEORY OF COMPENSATION.

A. Criteria for Phase II award.

The appropriate criteria for distribution of satellite retransmission royalties is not clearly resolved from the compulsory license statute, 17 U.S.C. Section 119, or precedent. All that seems certain is that any distribution methodology that evidently focuses on just one set of criteria to the exclusion of all others, would appear arbitrary.

IPG contends that certain obvious factors that would otherwise affect a negotiated license between a producer and an exhibitor are not present in the compulsory licensing scheme, and do not affect the royalties that are paid by the satellite systems retransmitting a broadcast, so any attempt to distribute the royalties collected by the Copyright Office by replicating the license fees that would occur on a broadcast-by-broadcast basis in the absence of a compulsory license is misguided. Because a satellite system is required to license a broadcast signal *en toto*, once there has been a determination as to which Phase I category a program should go into, then broadcasts of all programs within such category should arguably be allocated royalties based only on those factors that distinguish them within a single, integrated broadcast of a station, and are known in advance

that IPG or the Judges subsequently determine that programming should appropriately be categorized in a different category, IPG will amend its claim appropriately.

of the retransmitted broadcast - - no differently than an advance negotiated license between a copyright owner and an exhibitor. Logically then, the only factors that would be considered for distributing royalties to a particular program in Phase II are the factors of (i) which station(s) a program appeared on (which, in turn, allows for a determination as to the number of subscribers receiving the retransmitted signal, and what fees were collected from the station's retransmission), (ii) the number of times that the program was broadcast on such station, and (iii) the length of the program broadcast. Factors such as the unknown, after-the-fact determined viewership of the program, or after-the-fact ratings (there is a distinction), would be of no relevance, since the compulsory license fee paid by the Satellite System Operator ("SSO") is paid in advance of, and regardless of, any such determinations of viewership or ratings.

Notwithstanding, if the goal is to replicate what would occur in the free market in the absence of a compulsory license, as opposed to what has actually occurred (i.e., a statutory compulsory license rate that ignores free market factors as part of the SSO's royalty obligation), then the Judges need to additionally focus on such factors as (i) the *anticipated* viewership of the program, as reflected by the time period during which a program was broadcast (e.g., 8:00 pm versus 2:00 am).

How calculations based on the foregoing alternatives are accomplished, with the data that is commercially available, is a complex (yet manageable)

construction. IPG proposes a distribution methodology that relies on data that reflects the compulsory license fees that have been generated by retransmitted stations, the number of distant households that received the retransmitted broadcasts, programming data reflecting the length of the broadcast, and data that reflects the viewership within particular time periods calculated. With such data, each of the foregoing methodological alternatives can be constructed, against which all program claims can be fairly applied.

B. All Retransmitted Broadcasts Must Be Compensated.

IPG espouses that each and every program that is demonstrated to have been broadcast by a terrestrial station, and is thereafter retransmitted by a SSO, is required to receive some portion of the fees collected by the U.S. Copyright Office. Such entitlement exists based on criteria developed by the Copyright Royalty Tribunal, the Copyright Arbitration Royalty Panel, and the Copyright Office; specifically, (a) value to the SSO, (b) harm to the syndicator, (c) market value of the program, and (d) time. Moreover, such entitlement makes logical sense from the standpoint that 17 U.S.C. Section 119 requires a SSO to obtain a license for the entirety of the terrestrial signal, and deprives the owner of a retransmitted program from requiring the licensure of such program in order for such retransmission. Thus, the Judges should compensate all programs, even if such programs are

broadcast on terrestrial stations that are not the most significantly retransmitted terrestrial stations, or for which no evidence of actual viewing exists.

C. Compensation for each Identifiable Retransmitted Broadcast should be based on Objective Criteria that exists or can be determined *before* a retransmission occurs.

One of the primary criteria for awarding royalties in these proceedings is the value of carriage and programming to a SSO. IPG recognizes the common sense fact that SSOs cannot predict the viewership that will subsequently result for all broadcasts appearing on the terrestrial stations that they elect to retransmit, and may not even have a valid measurement of broadcast-by-broadcast viewership. That is, the value or appeal of any particular terrestrial station to a SSO cannot be based on ratings that will occur only after the SSO has elected to carry a terrestrial station. Such a proposition defies logic, and any method of distributing satellite retransmission royalties to a broadcast based entirely on the specific ratings of a broadcast is flawed in this respect.

Moreover, while the overall appeal of the terrestrial station to reach niches with a SSO's subscriber base could be the determinative factor that affects whether the SSO will carry particular terrestrial station, such overall appeal does not address the proper allocation of collected royalties *on a broadcast-by-broadcast basis* when the SSO is required to license the entirety of the terrestrial signal, and

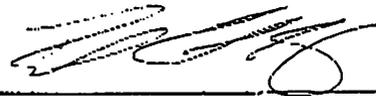
the program owner is thereby precluded from seeking recompense from the SSO that has retransmitted the program owner's program.

IPG does not offer the definitive explanation as to why each SSO elected to carry each of its retransmitted terrestrial stations during the 1999-2009 calendar years, and leaves such determination to the Phase I proceedings. Nonetheless, and in an attempt to construct a distribution methodology that will fairly recompense all programming that has been retransmitted by a satellite system pursuant to 17 U.S.C. Section 119, and for which a program owner has been denied the ability to directly license such distribution, IPG has attempted to construct a distribution methodology that is content-blind, and merely considers objective criteria that exists or can be determined *before* the retransmission occurs.

IV. IPG-CLAIMED BROADCASTS AND PROGRAMMING.

IPG has identified substantial broadcasts of IPG-claimed programs (the "Programs") that have generated satellite retransmission royalties during the 1999-2009 calendar years.³ Each of the Programs is either owned or controlled by entities that have assigned IPG the right to collect satellite retransmission royalties attributable to their programming.

Respectfully submitted,



Raul Galaz
Independent Producers Group

I declare under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge. Executed this 5th day of May, 2014.



Raul Galaz

³ See **Exhibit IPG-2**, attached hereto, for the lists of programs claimed by IPG, and the Phase I categories to which they apply. Such list reflects, to a certain extent, variations of the titles accorded to identical programs in data obtained by IPG in current and prior proceedings.

TESTIMONY OF LAURA ROBINSON, PH.D

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”), to provide expert witness testimony in the matter of *Distribution of 1999-2009 Satellite Royalty Funds*. This matter involves the distribution of 1999-2009 satellite retransmission royalties.

2. The issues I have been asked to address concern the distribution of 1999-2009 satellite retransmission royalties (“Satellite Royalties”) within the “Devotional”, “Program Suppliers” and “Sports” categories. According to the U.S. Copyright Office, satellite system operators paid over eight hundred sixty-nine million dollars in 1999-2009 Satellite Royalties.¹ I understand that the Phase I dispute regarding the allocation of the 1999-2009 Satellite Royalties among the Devotional, Program Suppliers, and Sports categories was resolved by settlement.²

¹ See U.S. Copyright Office, Licensing Division, Report of Receipts, published at <http://www.copyright.gov/licensing/lic-receipts.pdf>.

² See Distribution of the 1999-2009 Cable and Satellite Royalty Funds, Docket Nos. 2007-3 CRB CD 2004-2005, 2008-4 CRB CD 2006, 2009-6 CRB CD 2007, 2010-6 CRB CD 2008, 2011-7 CRB 2009; 2010-2 CRB SD 2004-2007, 2010-7 CRB 2008, 2011-8 CRB SD 2009, 76 Fed. Reg. 80969 (December 27, 2011).

I also understand that the 1999 programming for Program Suppliers and Sports categories is not at issue in this proceeding.³

3. The instant matter is a Phase II proceeding wherein IPG and various other claimants (“Non-IPG Claimants”) are in dispute as to the division of the 1999-2009 Satellite Royalties allocated to the Devotional, Program Suppliers and Sports categories. I understand that a central issue in determining the appropriate division of funds allocated to these categories relates to the relative market value of the broadcasts retransmitted by satellite system operators (“SSOs”) of the compensable copyrighted program titles held by IPG and the Non-IPG Claimants.

4. I have been asked by counsel to analyze the relative market value of the retransmitted broadcasts of the compensable copyrighted program titles held by IPG and the Non-IPG Claimants and to estimate the share attributable to IPG within each of the Phase I categories in which IPG has claims. I understand that counsel may further ask me to rebut forthcoming testimony of the Non-IPG Claimants regarding these issues.

5. I have not yet been provided with the identity of the retransmitted broadcasts claimed by the Non-IPG Claimants. Thus, in this report, I analyze the retransmitted broadcasts claimed by IPG and examine various indicators of the

³ Distribution of 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, and 2009 Satellite Royalty Funds, Dockets No. 2012-7 CRB SD 2000-2009, 2008-5 CRB SD 1999-2000, 78 Fed. Reg. 50114 (August 16, 2013).

market value of those broadcasts. I understand that data regarding the broadcasts claimed by the Non-IPG Claimants will be provided either through the Written Direct Statement filed by the Non-IPG Claimants, or produced by the Non-IPG Claimants through discovery. Once I receive this information I will complete my analysis of the relative market value of the retransmitted broadcasts claimed by IPG and the Non-IPG Claimants and estimate the share attributable to each.

6. I have reviewed and analyzed voluminous data and information during the preparation of this report including (i) data from the IPG on claimed titles and on satellite statements of account during 1999-2009 and (ii) TV Data (cka Tribune Media) providing 24/7 programming information regarding the broadcasts of distant signal stations during 1999-2009.

7. 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

8. Retransmitted broadcasts of copyrighted programs have economic value because (1) viewers enjoy watching retransmitted broadcasts, (2) satellite system operators earn revenues and profits from making copyrighted programs available to viewers, and (3) copyright owners earn revenues and profits from creating

programs and licensing them to satellite system operators through a compulsory licensing process. Copyright owners and SSOs do not bargain and negotiate the prices for such retransmission; rather, such price is effectively set through royalty rate proceedings comparable to the instant proceedings. I understand that the Copyright Royalty Judges consider the relative market value of the broadcasts a central issue in determining both the appropriate royalty rates and the appropriate division of royalty funds.

9. Analysis of the market value of retransmitted broadcasts benefits from an examination of a hypothetical negotiation between a willing buyer (a satellite system operator) and a willing seller (copyright owner). The economic theory of bargaining indicates that in such a negotiation it is necessary to consider the marginal costs and benefits to the parties of possible agreements as well as the next best alternative to the parties should they not reach agreement (“reservation prices”).⁴ In the case of copyright owners and the retransmission of copyrighted programs by satellite system operators, the copyright owner’s marginal costs are minimal⁵ and thus the outcome of the hypothetical negotiation will relate largely to the negotiating power of the parties and the SSO’s profitability. The actual

⁴ For discussions of economic theories of bargaining and negotiation, see: (1) Howard Raiffa, 1982. *The Art & Science of Negotiation*. Boston, MA: Harvard University Press, and (2) Drew Fudenberg & Jean Tirole, 1991. *Game Theory*. Cambridge, MA: MIT Press Books.

⁵ Most of the copyright owner’s costs are fixed costs already incurred or “sunk.”

marginal costs and benefits faced by the SSOs is complicated in part by the facts that satellite system operators are statutorily required to retransmit a station in its entirety and that copyrighted programs being provided to subscribers are bundled.

10. While I do not have direct information regarding the marginal benefits and marginal costs faced by the satellite system operators retransmitting the broadcasts at issue in the instant matter, I have data on various indicia of the economic value of the retransmitted broadcasts. These data include the length in minutes of the retransmitted broadcasts, the time of day of the retransmitted broadcasts, and the number of persons distantly subscribing the stations broadcasting the claimed programs.

11. My conclusion that IPG's program titles have substantial market value is based on analysis and evidence indicating that (i) IPG has claim to over three hundred thousand retransmitted broadcasts during 1999-2009, (ii) that those retransmitted broadcasts comprise over two hundred and fifteen thousand broadcast hours, and (iii) that various indicia of the economic value of the retransmitted broadcasts show that IPG's retransmitted broadcasts have values across the full range of observed values; these indicia include the time of day of the broadcasts and the number of persons distantly subscribing the station broadcasting the IPG-claimed program.

12. So far, I have focused on a discussion of the market value of the retransmitted broadcast. However, the fundamental exercise required is an analysis of the *relative* market value. One of the ways in which an analysis of relative market value can be distinguished from an analysis of market value is that it does not require knowledge of factors that are common among the broadcasts being valued and compared. For example, if broadcasts shown on stations with more distant subscribers are generally worth more than broadcasts shown on stations with fewer distant subscribers, it is not necessary to know exactly how the number of distant subscribers to a station relates to the value of a retransmitted broadcast to know that, based on this criteria, a broadcast retransmitted on a station with 100,000 distant subscribers is relatively more valuable than a broadcast retransmitted on a station with 10,000 distant subscribers.

13. As described above, my assignment is to estimate the value of the retransmission of IPG's claimed programs relative to the broadcasts claimed by the Non-IPG Claimants. As also discussed above, I have not yet received information regarding which broadcasts are being claimed by the Non-IPG Claimants. As a practical matter, I cannot estimate the quantum of IPG's relative market value until I obtain information regarding the broadcasts claimed by the Non-IPG Claimants. When I obtain such information I will estimate the relative market value of IPG-claimed broadcasts and the Non-IPG-Claimed broadcasts by analyzing and

comparing the number of claimed broadcasts, the length in minutes of the claimed broadcasts, the time of day of the broadcasts, and the number of distant subscribers of the stations carrying those broadcasts.

III. QUALIFICATIONS

14. 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.

15. 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.

16. 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.

17. 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.

18. My further experience is summarized in my curriculum vitae, which is attached to this Report as Exhibit IPG-3.

IV. DATA

19. Data I have relied on in this matter includes data from IPG, TV Data, and Nielsen Media Research. The IPG data include 4,319 program titles claimed by IPG in this matter. IPG data summarizing satellite statements of account and TV Data broadcast data both comprise information about stations that were distantly retransmitted by satellite system operators during 1999-2009, while the Nielsen data comprises summary viewership information for selected stations from 2000 to 2004.

20. IPG provided me with data summarizing satellite statements of account during 1999-2009. The data lists each distant signal station and includes data fields with information about the characteristics of each station in each year, including: the station call sign and the number of distant subscribers (i.e., the number of satellite system subscribers who receive the station and to whom the station is distant).

21. The information from TV Data includes broadcast data on program titles during 1999-2009 and distantly retransmitted by SSOs. The information in this database includes the date and time the broadcast was aired (to the minute), the station call sign, the program length (in minutes), the program type, and the program title.⁶

22. The data from Nielsen Media Research includes viewing data for selected distant signal stations collected by Nielsen and produced by the MPAA in the 2000-2003 Cable Royalty Distribution Proceedings. These data show total projected viewership by station and time of day in quarter hour increments. The Nielsen viewing data is also supported by Nielsen Media Research reports

⁶ In each year from 1999 to 2009, the distant subscribers of the stations covered in the TV Data cover at least 97% of the distant subscribers for all stations covered in the satellite statements of account.

reflecting relative viewing according to time period over a decades-long study of viewing.⁷

V. ANALYSIS

23. As described above, I have been asked by counsel to analyze the relative market value of the retransmitted broadcasts of the compensable copyrighted program titles held by the IPG and Non-IPG Claimants. In this section I will discuss the methodology I employ to assess relative market value.

24. I merged the data on the IPG-claimed titles, the satellite statement of account information, the TV Data with broadcast information, and the Nielsen data on viewership. The resulting database (“1999-2009 Database”) allows me to analyze characteristics and value of IPG-claimed distantly retransmitted broadcasts during 1999-2009.

25. The analysis of relative value of IPG-claimed and Non-IPG claimed broadcasts includes comparison of various characteristics of such broadcasts: the number of broadcasts, the number of hours or quarter hours of broadcasts, the time of day of the broadcasts, and the number of distant subscribers to the station broadcasting the claimed title.

Characteristics and Value of IPG-Claimed Broadcasts

⁷ Nielsen Television Audience Report, 2010 and 2011.

26. As Table 1 shows, over three hundred thousand distantly retransmitted broadcasts of IPG-claimed programming were identified. Of these, approximately two hundred and fifty-seven thousand IPG-claimed distantly retransmitted broadcasts are in the Program Suppliers category, forty-five thousand are in the Devotional category, and three hundred and ninety-four are in the Sports category.

Table 1: IPG-Claimed Titles 1999-2009

	Program Suppliers (2000-2009)	Devotional (1999-2009)	Sports (2000-2009)	Total
Number of Distantly Retransmitted Broadcasts of IPG-Claimed Titles	256,751	45,068	394	302,213
Number of Hours of Distantly Retransmitted Broadcasts of IPG-Claimed Titles	191,553	23,717	858	216,128

Note: Hours of broadcasts are calculated by summing the length of the relevant broadcasts in minutes and then dividing by 60.

Source: Broadcast data from TV Data (cka Tribune Media).

27. Further analysis shows that these IPG-claimed distantly retransmitted broadcasts reflect over two hundred and fifteen thousand hours of programming during 1999-2009. Of these, approximately one hundred and ninety-two thousand IPG-claimed distantly retransmitted broadcast hours are in the Program Suppliers category, twenty-four thousand are in the Devotional category, and eight hundred and fifty-eight are in the Sports category.

Distant Subscribers to Stations Distantly Retransmitting IPG-Claimed Programming

28. Analysis of the 1999-2009 Database identifies the number of distant subscribers who subscribe to the SSOs retransmitting stations broadcasting the IPG-claimed programs, and establish that IPG-claimed retransmitted broadcasts are shown on stations reflecting the full range of distant subscribers. For example, Table 2 shows that there are 23,409 IPG-claimed broadcast hours in the Program Suppliers category retransmitted by SSOs on stations with more than ten million distant subscribers. Exhibit IPG-4a provides this information on a yearly basis.

Table 2: Hours of Programming by Distant Subscriber Category

<u>Subscriber Category</u>	<u>Hours of Programming 1999-2009</u>		
	<u>Program Suppliers (2000-2009)</u>	<u>Devotional (1999-2009)</u>	<u>Sports (2000-2009)</u>
0 ≤ Subs < 60K	21,633	1,192	66
60K ≤ Subs < 100K	37,716	2,301	174
100K ≤ Subs < 400K	29,620	2,630	172
400K ≤ Subs < 1 MM	28,173	2,463	255
1 MM ≤ Subs < 5 MM	27,300	6,318	46
5 MM ≤ Subs < 10 MM	23,703	6,289	67
Subs ≥ 10 MM	23,409	2,523	79
Total	191,553	23,717	858

29. Exhibit IPG-6 further analyzes the distant-subscriber metric by computing the average number of distant subscribers to stations that are being distantly retransmitted by satellite system operators and that are broadcasting IPG-claimed

titles. The data show that the average IPG-claimed distantly retransmitted broadcast is being shown by a station with more than six million distant subscribers.

Time of Day of IPG-Claimed Distantly Retransmitted Broadcasts

30. My information from Nielsen Media Research includes data on daily television viewership during 2000-2004 for selected stations by time of day in quarter-hour increments.⁸ According to these data, the average quarter hour of broadcasting generates an average of approximately 176.1 million viewers across the selected stations over the entire period covered by the Nielsen data. Viewership varies by the time of day with some primetime quarter hours experiencing over four hundred million viewers over the measured time period while some quarter hours experience fewer than twenty-five million viewers. Exhibit IPG-5a shows the distribution of viewership for the selected stations by time of day.

31. Exhibit IPG-5a also shows the distribution of the IPG distantly retransmitted broadcasts across time of day and demonstrates that IPG-claimed distantly retransmitted broadcasts are distributed throughout the day. Further analysis shown in Exhibit IPG-5a demonstrates that Nielsen viewers weighted by

⁸ I understand that this information was produced to IPG in the 2000-2003 Cable Royalty Distribution Proceedings (Phase II). This Nielsen data includes data for 6 "sweep cycles" from 2000 to 2003, plus the first two sweep cycles of 2004.

IPG broadcast quarter hours reflect an average of 152.2 million viewers in the Program Suppliers category, 114.4 million viewers in the Devotional category, and 199.1 million viewers in the Sports category. In other words, IPG-claimed Program Supplier and Devotional broadcasts are, on average, at times of days that have lower than the average 176.1 million viewers, whereas IPG-claimed Sports broadcasts are, on average, at times of days that have greater than the average 176.1 million viewers.

32. I understand that a prior ruling of the Librarian of Congress, in Phase I of the 1998 and 1999 Cable Royalty Funds proceedings, held that household viewership is the “wrong thing” to measure for allocating retransmission royalties. See *Distribution of 1998 and 1999 Cable Royalty Funds*, 69 Fed. Reg. 3606, 3613 (Jan. 26, 2004). I present this time-of-day viewership analysis as it may provide an indication of market value but do not opine on the weighting of such indicia.

Value of IPG-Claimed Distantly Retransmitted Broadcasts

33. My conclusion that IPG’s program titles have substantial market value is based on analysis and evidence showing that (i) IPG claims a substantial number of distantly retransmitted titles, (ii) such retransmitted programs were retransmitted on a substantial number of occasions, (iii) such claimed broadcasts were retransmitted for a substantial number of hours, (iv) there are a substantial number

of distant subscribers to the stations broadcasting the IPG-claimed titles being retransmitted by SSOs, and (v) IPG-claimed distantly retransmitted broadcasts are distributed throughout the day including during periods of significant viewership across the United States.

34. As discussed above the fundamental exercise required in this matter is an analysis of the *relative* market value of the IPG-claimed titles and the Non-IPG claimed titles. Once I obtain the Non-IPG claimed titles I will conduct the same analysis on those titles as I have conducted on the IPG-claimed titles. Then I can compare the results of the IPG-claimed titles and the Non-IPG claimed titles in order to estimate the relative value.

35. In addition to comparing the number of titles, the number of distantly-retransmitted broadcasts, and the number of distantly-retransmitted broadcast hours, I will also compare the characteristics of the claimed broadcasts. These characteristics provide indicia of economic value. For example, *Ceteris paribus*, the more distant subscribers to the station broadcasting the claimed title, the more value may be ascribed to the title. *Ceteris paribus*, the greater the viewership at the time of day of the broadcast the more value may be ascribed to the title. By looking at several indicia of economic value and comparing same across the IPG and Non-IPG claimed titles I will estimate the relative value of the parties' claimed titles and the concomitant reasonable allocation of royalties among the parties.

VI. CONCLUSIONS

36. In this report, I analyze the program titles and broadcasts claimed by IPG and examine various indicators of the market value of those titles. I find that IPGs program titles have substantial market value.

37. I understand that data regarding the titles claimed by the Non-IPG Claimants will be provided either through the Written Direct Statement filed by the Non-IPG Claimants, or produced by the Non-IPG Claimants through discovery. Once I receive this information I will complete my analysis of the relative market value of the titles identified by IPG and the Non-IPG Claimants and estimate the share of attributable to IPG.

Respectfully submitted,



Laura O. Robinson, Ph.D
Navigant Consulting, Inc.

I declare under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge. Executed this 8th day of May, 2014.



Laura O. Robinson

EXHIBIT IPG - 1

	CLAIMANT	YEARS OF REPRESENTATION
	DEVOTIONAL	
1	Adventist Media Center, Inc.	1999
2	Benny Hinn Ministries	1999-2009
3	Billy Graham Evangelistic Association	2001-2003
4	Cinemavault Releasing, Inc.	2001-2009
5	Creflo Dollar Ministries	1999-2009
6	Eagle Mountain Int'l Church (Kenneth Copeland Ministries)	1999-2009
7	Envoy Productions	2001
8	Feed the Children, Inc.	1999-2009
9	Granada Media	2000
10	Great Plains National Instructional Library (cka Restructure Holding)	2000-2009
11	IWV Media Group, Inc.	2002-2009
12	Jack Van Impe Ministries International	2001-2009
13	Life Outreach International	1999-2009
14	Pacific Family Entertainment	2000-2009
15	Paradigm Pictures Corporation	2000-2009
16	Promark Television, Inc.	1999-2009
17	Reel Media International	2000-2009
18	Salem Baptist Church of Chicago, Inc.	2001-2002, 2004-2009
19	Willie Wilson Productions, Inc.	2000-2009
	SPORTS	
1	Fédération Internationale de Football Association	2000-2009
2	United States Olympic Committee	2000-2003
	PROGRAM SUPPLIERS	
1	Academy of Television Arts and Sciences	2000-2009
2	Acme Communications Inc. cka Mojo Brands Media LLC	2003-2009
3	Adams Golf	2001-2009
4	Adler Media, Inc.	2000, 2002

5	Agency for Instructional Technology	2000
6	American Film Institute	2000-2008
7	Anheuser-Busch Companies, Inc.	2000-2009
8	Ardent Productions	2000-2009
9	Atlantic Film Partners	2000-2009
10	Aviva International	2000-2009
11	BBC Worldwide / TEAM Communications	2000-2009
12	BBC Worldwide Americas, Inc.	2000-06/30/2008
13	Beacon Communications Corp.	2000 thru 7/2003
14	Beckmann International	2000-2009
15	Best Direct (International) Ltd.	2001
16	Beyond International, Ltd.	2000
17	Big Events Company	2000-2009
18	Big Feats Entertainment, L.P.	2000-2009
19	BKS Entertainment	2000-2009
20	Bloomberg Television	2000
21	Breakthrough Films	2000-2009
22	BVTV, Inc.	2000-2009
23	C/F International	2000-2009
24	Canamedia Productions, Ltd.	2000
25	Candid Camera, Inc.	2000
26	Cappy Productions	2000-2009
27	Carol Reynolds Productions Inc.	2000-2009
28	Central City Productions	2000-2009
29	Cheaters International	2001-2009
30	Chesler Perlmutter Productions	2000-2009
31	Cinegroupe Images Inc.	2000
32	Cinemaginaire Inc.	2000-2009
33	Cinemavault Releasing, Inc.	2001-2009
34	Cirque du Soleil Images Inc.	2000-2009
35	Cogeco Radio-Television	2000-2009
36	Community Television Foundation of South Florida	2000
37	Computer Personalities Systems Inc.	2000-2009
38	Conus Communications	2000-2009

39	Cosgrove-Meurer Productions	2000-2006
40	Cottage Country Television (2000) Inc.	2000
41	Daniel Hernandez Productions	2000-2009
42	David Finch Distribution Ltd.	2000-2009
43	Decode Entertainment	2000-2001
44	Devillier Donegan Enterprises	2000-2009
45	Direct Cinema Ltd.	2000-2009
46	Distraction Formats	2000-2009
47	Envoy Productions	2001
48	Farm Journal Electronic Media	2000-2009
49	Fédération Internationale de Football Association	2000-2009
50	Feed the Children, Inc.	1999-2009
51	Filmline International 1999 Inc.	2000-2009
52	Films By Jove, Inc.	2000-2009
53	Firing Line (dba for National Review, Inc.)	2000-2009
54	Fishing University LLC	2000-2009
55	Fitness Quest, Inc.	2001
56	Five Star Productions	2000-2009
57	Florentine Films/Hott Productions, Inc.	2001-2009
58	Funimation Productions	2000-2009
59	Global Response LLC	2000-2009
60	Golden Films Finance Corporation	2000-2009
61	Gorky Studios	2000-2009
62	Granada Media	2000
63	Grandolph Juravic Entertainment	2000-2009
64	GRB Entertainment	2000
65	Great Plains National Instructional Library (cka Restructure Holding)	2000-2009
66	Greenlight Entertainment	2000-2009
67	GTSP Records	2000-2009
68	HLB Productions	2000-2009
69	Home Enterprises	2000-2009
70	Image Entertainment, Inc.	2000-2009
71	InCA Productions	2000-2009

72	Integrity Global Marketing	2000-2009
73	IWV Media Group, Inc.	2002-2009
74	JCS Entertainment II	2000-2009
75	K2 Media Group	2000-2009
76	Kid Friendly Productions	2000-2009
77	King Motion Picture Corporation	2001-2009
78	Knight Enterprises	2000-2009
79	Lawrence Welk Syndication	2000-2009
80	Les Distributions Rozon, Inc./Just for Laughs	2001-2009
81	Les Productions du Verseau	2000
82	Les Productions Videofilms Limitee	2001-2009
83	Link Television Entertainment	2000-2009
84	Lipscomb Entertainment	2000-2009
85	Magus Entertainment	2000-2009
86	Mainframe Entertainment cka Rainmaker Entertainment Inc.	2000-2006
87	Mampre Media International	2000
88	Mansfield Television Distribution Co.	2000-2009
89	Mark Anthony Entertainment	2000-2009
90	Martha Stewart Living Omnimedia, Inc.	2000
91	MBC Teleproductions	2000
92	Mentorn Barraclough Carey	2000-2009
93	Meredith Corporation	2000-2009
94	Midwest Center for Stress & Anxiety	2000-2009
95	MoneyTV.net, Inc.	2003-2009
96	Multimedia Group of Canada	2000-2009
97	Mustang Marketing, Inc.	2000
98	National Academy of Television Arts and Sciences	2000-2009
99	Nelson Davis Productions	2003-2009
100	Network Programs International	2000-2009
101	New Visions Syndication	2000-2009
102	NTS Program Sales	2000-2009
103	Nu/Hart Hair Clinics, Inc.	2000-2001
104	Pacific Family Entertainment	2000-2009
105	Paradigm Pictures Corporation	2000-2009

106	Passport International Productions	2000-2009
107	Peter Rodgers Organization	2000-2009
108	PMT, Ltd.	2000-2009
109	Productions Pixcom, Inc.	2001-2009
110	Productions Point de Mire	2000
111	Promark Television, Inc.	1999-2009
112	Psychic Readers Network	2000-2009
113	Quartet International	2000-2009
114	Questar, Inc.	2000-2009
115	Raycom Sports	2000-2009
116	Red Apple Entertainment Corporation (cka Frantic Films)	2001-2009
117	Reel Media International	2000-2009
118	Ron Hazelton Productions, Inc.	2000-2009
119	Sarrazin Couture Entertainment	2000-2002
120	Satsuki Ina (aka Hesono O Productions)	2003-2009
121	Seen On TV LLC	2001-2009
122	Showtime Networks	2000-2009
123	Simply Fishing, Inc.	2001-2009
124	Slim Goodbody Corporation	2000
125	Small World Productions	2001-2003
126	Sound Venture Productions Ottawa Ltd.	2001-2009
127	Splendid Film Gmbh	2004-2009
128	St. Jude Children's Hospital	2000-2002
129	Stilson & Stilson	2000
130	TEAM Communications	2000-2009
131	Tempur-Pedic, Inc.	2001
132	TF1 International	2000
133	Thump Records, Inc.	2001, 2004-2009
134	Timberwolf Productions	2000-2009
135	Today's Homeowner	2000-2004
136	TV Guide	2000-2009
137	TV Matters cka Film Matters	2000-2009
138	Twin Cities Public TV	2000-2009
139	United Negro College Fund	2000-2009

140	United States Olympic Committee	2000-2003
141	Uniworld Group	2000
142	Urban Latino TV, LLC (cka American Latino)	2000-2009
143	Vendome Television	2000
144	Venevision International	2001
145	Video Media Distribution, Inc.	2000-2009
146	Video Professor, Inc.	2000
147	Video Tours, Inc.	2000-2009
148	Watercourse Road Productions LLC	2000-2009
149	West 175 Enterprises	2000-2009
150	Whidbey Island Films, Inc.	2001-2009
151	Willie Wilson Productions, Inc.	2000-2009
152	World Events Productions	2000-2009
153	Worldwide Pants, Inc.	2000-2002, 2006-2009

EXHIBIT IPG - 2

	PROGRAM	PHASE I CATEGORY				
1	2009 Southwest Believers Convention	DEVOTIONAL				
2	3 Days	DEVOTIONAL / PROGRAM SUPPLIERS				
3	A Vow to Cherish	DEVOTIONAL				
4	Adrift	DEVOTIONAL / PROGRAM SUPPLIERS				
5	Aftermath	DEVOTIONAL / PROGRAM SUPPLIERS				
6	Against All Odds	DEVOTIONAL / PROGRAM SUPPLIERS				
7	Amazing Grace	DEVOTIONAL / PROGRAM SUPPLIERS				
8	Americans Feeding Americans	DEVOTIONAL / PROGRAM SUPPLIERS				
9	America's Throwaway Children	DEVOTIONAL / PROGRAM SUPPLIERS				
10	An Eye for an Eye	DEVOTIONAL / PROGRAM SUPPLIERS				
11	Behind Closed Doors	DEVOTIONAL / PROGRAM SUPPLIERS				
12	Believers Voice	DEVOTIONAL				
13	Believers Voice of Victory	DEVOTIONAL				
14	Believer's Voice of Victory	DEVOTIONAL				
15	Believers Voice of Victory Weekly	DEVOTIONAL				
16	Benny Hinn	DEVOTIONAL				
17	Benny Hinn and You	DEVOTIONAL				
18	Benny Hinn Daily	DEVOTIONAL				
19	Benny Hinn Special: Life & Passion of Christ	DEVOTIONAL				
20	Benny Hinn Telethon	DEVOTIONAL				
21	Benny Hinn: Good Friday	DEVOTIONAL				
22	Betrayed	DEVOTIONAL / PROGRAM SUPPLIERS				
23	Betrayed!	DEVOTIONAL / PROGRAM SUPPLIERS				
24	Better Way	DEVOTIONAL / PROGRAM SUPPLIERS				
25	Beyond the Stars	DEVOTIONAL / PROGRAM SUPPLIERS				
26	Billy Graham	DEVOTIONAL				
27	Billy Graham Classic Crusades	DEVOTIONAL				
28	Billy Graham Crusade	DEVOTIONAL				
29	Billy Graham Crusade: Guess Who's Coming	DEVOTIONAL				
30	Billy Graham Ministries	DEVOTIONAL				
31	Billy Graham Special	DEVOTIONAL				
32	Billy Graham Youth Special	DEVOTIONAL				
33	Boomerang	DEVOTIONAL / PROGRAM SUPPLIERS				

34	Breath of Life	DEVOTIONAL				
35	Breath of Life with Walter Pearson	DEVOTIONAL				
36	BVOV	DEVOTIONAL				
37	BVOV Weekly	DEVOTIONAL				
38	Caught	DEVOTIONAL				
39	Changing Your World	DEVOTIONAL				
40	Child Survivors	DEVOTIONAL / PROGRAM SUPPLIERS				
41	Children in Crisis	DEVOTIONAL / PROGRAM SUPPLIERS				
42	Children of Aids: A Global Crisis	DEVOTIONAL / PROGRAM SUPPLIERS				
43	Children On The Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
44	Christmas in July	DEVOTIONAL / PROGRAM SUPPLIERS				
45	Christmas Is	DEVOTIONAL / PROGRAM SUPPLIERS				
46	City That Forgot About Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
47	Class Reunion	DEVOTIONAL / PROGRAM SUPPLIERS				
48	Conspiracy Theory	DEVOTIONAL / PROGRAM SUPPLIERS				
49	Copeland	DEVOTIONAL				
50	Creflo A. Dollar Jr.	DEVOTIONAL				
51	Creflo Dollar	DEVOTIONAL				
52	Creflo Dollar Live	DEVOTIONAL				
53	Creflo Dollar Ministries	DEVOTIONAL				
54	Creflo Dollar: 8 Steps to Create the Life You Want	DEVOTIONAL				
55	Crisis at Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
56	Dark Journey	DEVOTIONAL / PROGRAM SUPPLIERS				
57	DaySpring Visitation With Benny Hinn	Devotional				
58	Dead End	DEVOTIONAL / PROGRAM SUPPLIERS				
59	Decision	DEVOTIONAL / PROGRAM SUPPLIERS				
60	Desperate Households	DEVOTIONAL / PROGRAM SUPPLIERS				
61	Dewey's Magical Sleigh	DEVOTIONAL / PROGRAM SUPPLIERS				
62	Diary	DEVOTIONAL / PROGRAM SUPPLIERS				
63	Dr. Jack Van Impe	DEVOTIONAL				
64	Eagle Mountain International Church	DEVOTIONAL				
65	Easter Is	DEVOTIONAL / PROGRAM SUPPLIERS				
66	Easter Is...	DEVOTIONAL / PROGRAM SUPPLIERS				
67	Easy Money	DEVOTIONAL / PROGRAM SUPPLIERS				

68	Eye of the Storm	DEVOTIONAL / PROGRAM SUPPLIERS				
69	Faith for Today	DEVOTIONAL				
70	Family Affair	DEVOTIONAL / PROGRAM SUPPLIERS				
71	Fathers' Day	DEVOTIONAL / PROGRAM SUPPLIERS				
72	Father's Day	DEVOTIONAL / PROGRAM SUPPLIERS				
73	Feed the Children	DEVOTIONAL / PROGRAM SUPPLIERS				
74	Feed the Children Amercans Feeding Americans	DEVOTIONAL / PROGRAM SUPPLIERS				
75	Feed the Children Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
76	Feed the Children Christmas Special	DEVOTIONAL / PROGRAM SUPPLIERS				
77	Feed the Children Holiday Special	DEVOTIONAL / PROGRAM SUPPLIERS				
78	Feed the Children Special	DEVOTIONAL / PROGRAM SUPPLIERS				
79	Feed the Children: An Inconvient Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
80	Firestorm	DEVOTIONAL / PROGRAM SUPPLIERS				
81	Focus	DEVOTIONAL / PROGRAM SUPPLIERS				
82	For Pete's Sake	DEVOTIONAL				
83	Franklin Graham	DEVOTIONAL				
84	Franklin Graham Crusade	DEVOTIONAL				
85	Freedom Is	DEVOTIONAL / PROGRAM SUPPLIERS				
86	Give and Take	DEVOTIONAL / PROGRAM SUPPLIERS				
87	Greatest Gift	DEVOTIONAL / PROGRAM SUPPLIERS				
88	Heartache of Hunger	DEVOTIONAL / PROGRAM SUPPLIERS				
89	Higher Ground	DEVOTIONAL / PROGRAM SUPPLIERS				
90	Home Sweet Home	DEVOTIONAL / PROGRAM SUPPLIERS				
91	Homecoming	DEVOTIONAL / PROGRAM SUPPLIERS				
92	Hope for the Holidays	DEVOTIONAL / PROGRAM SUPPLIERS				
93	Hunger Hurts	DEVOTIONAL / PROGRAM SUPPLIERS				
94	In the Name of Love	DEVOTIONAL / PROGRAM SUPPLIERS				
95	Interlude	DEVOTIONAL / PROGRAM SUPPLIERS				
96	It Is Written	DEVOTIONAL				
97	Jack Van Impe	DEVOTIONAL				
98	Jack Van Impe Presents	DEVOTIONAL				
99	James Robeson	DEVOTIONAL				
100	James Robinson	DEVOTIONAL				
101	James Robison	DEVOTIONAL				

102	James Robison Africa	DEVOTIONAL				
103	James Robison: Sudan	DEVOTIONAL				
104	James T. Meeks	DEVOTIONAL				
105	KCM SW Believers Convention	DEVOTIONAL				
106	Kenneth and Gloria	DEVOTIONAL				
107	Kenneth and Gloria Copeland	DEVOTIONAL				
108	Kenneth Copeland	DEVOTIONAL				
109	Kenneth Copeland Ministries	DEVOTIONAL				
110	Kenneth Copeland Special: Empowered to Succeed	DEVOTIONAL				
111	Kenneth Copeland Weekly	DEVOTIONAL				
112	Kenneth Copeland's Believer's Convention	DEVOTIONAL				
113	Larry Jones	DEVOTIONAL / PROGRAM SUPPLIERS				
114	Larry Jones Americans Feeding Americans	DEVOTIONAL / PROGRAM SUPPLIERS				
115	Larry Jones Christmas Special	DEVOTIONAL / PROGRAM SUPPLIERS				
116	Life Outreach	DEVOTIONAL				
117	Life Today	DEVOTIONAL				
118	Life Today with James Robinson	DEVOTIONAL				
119	Life Today With James Robison	DEVOTIONAL				
120	Lifestyle Magazine	DEVOTIONAL				
121	Lifestyle Magazine Christmas Special	DEVOTIONAL				
122	Lifestyle Magazine Nostalgia	DEVOTIONAL				
123	Lifestyle Magazine Special	DEVOTIONAL				
124	Light in the Darkness	DEVOTIONAL / PROGRAM SUPPLIERS				
125	Like Father, Like Son	DEVOTIONAL / PROGRAM SUPPLIERS				
126	Linda	DEVOTIONAL / PROGRAM SUPPLIERS				
127	Little Shepherd	DEVOTIONAL / PROGRAM SUPPLIERS				
128	Living on the Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
129	Lost and Found	DEVOTIONAL / PROGRAM SUPPLIERS				
130	Man of the Year	DEVOTIONAL / PROGRAM SUPPLIERS				
131	Manna From Heaven	DEVOTIONAL				
132	Masquerade	DEVOTIONAL / PROGRAM SUPPLIERS				
133	Maximize the Moment	DEVOTIONAL / PROGRAM SUPPLIERS				
134	Millie	DEVOTIONAL / PROGRAM SUPPLIERS				
135	Mission Feeding	DEVOTIONAL				

136	More Than Conquerors	DEVOTIONAL / PROGRAM SUPPLIERS				
137	New Harvest	DEVOTIONAL / PROGRAM SUPPLIERS				
138	New Harvest Show	DEVOTIONAL / PROGRAM SUPPLIERS				
139	New Salem Baptist Church	DEVOTIONAL				
140	New Salem Church	DEVOTIONAL				
141	No Greater Love	DEVOTIONAL / PROGRAM SUPPLIERS				
142	No Longer Alone	DEVOTIONAL				
143	No Place to Hide	DEVOTIONAL / PROGRAM SUPPLIERS				
144	No Way Out	DEVOTIONAL / PROGRAM SUPPLIERS				
145	On Main Street	DEVOTIONAL / PROGRAM SUPPLIERS				
146	One Day Makes a Difference	DEVOTIONAL / PROGRAM SUPPLIERS				
147	One Nation Under God	DEVOTIONAL				
148	Other Wise Man	DEVOTIONAL / PROGRAM SUPPLIERS				
149	Out of the Past	DEVOTIONAL / PROGRAM SUPPLIERS				
150	Over the Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
151	Pie in the Sky	DEVOTIONAL / PROGRAM SUPPLIERS				
152	Power Play	DEVOTIONAL				
153	Primary Focus	DEVOTIONAL				
154	Problem Child	DEVOTIONAL / PROGRAM SUPPLIERS				
155	Puzzle Club	DEVOTIONAL / PROGRAM SUPPLIERS				
156	Puzzle Club Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
157	Puzzle Club Christmas Mystery	DEVOTIONAL / PROGRAM SUPPLIERS				
158	Puzzle Club Easter	DEVOTIONAL / PROGRAM SUPPLIERS				
159	Puzzle Club Easter Adventure	DEVOTIONAL / PROGRAM SUPPLIERS				
160	Puzzle Club Pet-Napping Mystery	DEVOTIONAL / PROGRAM SUPPLIERS				
161	Red Boots for Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
162	Repeat Performance	DEVOTIONAL				
163	Revenge	DEVOTIONAL / PROGRAM SUPPLIERS				
164	Reverend Meeks	DEVOTIONAL				
165	Road to Recovery	DEVOTIONAL / PROGRAM SUPPLIERS				
166	Road to Redemption	DEVOTIONAL				
167	Robinson/Colbert	DEVOTIONAL				
168	Robison and Colbert	DEVOTIONAL				
169	Rooted in Gospel	DEVOTIONAL / PROGRAM SUPPLIERS				

170	Salem Baptist	DEVOTIONAL				
171	Salem Baptist Church	DEVOTIONAL				
172	Salem Baptist Church of Chicago, Inc.	DEVOTIONAL				
173	Salem Church	DEVOTIONAL				
174	Second Chance	DEVOTIONAL / PROGRAM SUPPLIERS				
175	Shadow of a Doubt	DEVOTIONAL / PROGRAM SUPPLIERS				
176	Shattered Dreams	DEVOTIONAL / PROGRAM SUPPLIERS				
177	Shield of Faith	DEVOTIONAL / PROGRAM SUPPLIERS				
178	Singsation	DEVOTIONAL / PROGRAM SUPPLIERS				
179	Singsation!	DEVOTIONAL / PROGRAM SUPPLIERS				
180	Singsation! International Gospel Humanitarian Awards	DEVOTIONAL / PROGRAM SUPPLIERS				
181	Singsations	DEVOTIONAL / PROGRAM SUPPLIERS				
182	Smear	DEVOTIONAL / PROGRAM SUPPLIERS				
183	Something to Sing About	DEVOTIONAL				
184	Songs From the Heart	DEVOTIONAL / PROGRAM SUPPLIERS				
185	Songs of the Season	DEVOTIONAL / PROGRAM SUPPLIERS				
186	Southwest Believers Convention	DEVOTIONAL				
187	Stableboy's Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
188	Still Standing	DEVOTIONAL / PROGRAM SUPPLIERS				
189	Sweet Relief	DEVOTIONAL / PROGRAM SUPPLIERS				
190	Tears of Terror	DEVOTIONAL / PROGRAM SUPPLIERS				
	The Billy Graham Television Special Featuring					
191	Franklin Graham	DEVOTIONAL				
192	The Champion	DEVOTIONAL / PROGRAM SUPPLIERS				
193	The City That Forgot About Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
194	The City That Forgot Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
195	The Climb	DEVOTIONAL				
196	The Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
197	The Empty House	DEVOTIONAL / PROGRAM SUPPLIERS				
198	The Greatest Gift	DEVOTIONAL / PROGRAM SUPPLIERS				
199	The Hunger Next Door	DEVOTIONAL / PROGRAM SUPPLIERS				
200	The Message	DEVOTIONAL / PROGRAM SUPPLIERS				
201	The Morning After	DEVOTIONAL / PROGRAM SUPPLIERS				
202	The Morning Show	DEVOTIONAL / PROGRAM SUPPLIERS				

203	The People Next Door	DEVOTIONAL / PROGRAM SUPPLIERS				
204	The Promise	DEVOTIONAL / PROGRAM SUPPLIERS				
205	The Puzzle Club Christmas Mystery	DEVOTIONAL / PROGRAM SUPPLIERS				
206	The Puzzle Club Easter Adventure	DEVOTIONAL / PROGRAM SUPPLIERS				
207	The Stableboy's Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
208	The Stranger	DEVOTIONAL / PROGRAM SUPPLIERS				
209	The Sure Thing	DEVOTIONAL / PROGRAM SUPPLIERS				
210	The Tie That Binds	DEVOTIONAL / PROGRAM SUPPLIERS				
211	This Is Your Day	DEVOTIONAL				
212	Three Days	DEVOTIONAL / PROGRAM SUPPLIERS				
213	Time for Change	DEVOTIONAL / PROGRAM SUPPLIERS				
214	Tis the Season	DEVOTIONAL / PROGRAM SUPPLIERS				
215	Transition	DEVOTIONAL / PROGRAM SUPPLIERS				
216	Transitions	DEVOTIONAL / PROGRAM SUPPLIERS				
217	Trial by Fire	DEVOTIONAL / PROGRAM SUPPLIERS				
218	Undertow	DEVOTIONAL / PROGRAM SUPPLIERS				
219	Victory	DEVOTIONAL / PROGRAM SUPPLIERS				
220	Voice of Victory	DEVOTIONAL				
221	Wednesday's Child	DEVOTIONAL / PROGRAM SUPPLIERS				
222	When the Bough Breaks	DEVOTIONAL / PROGRAM SUPPLIERS				
223	World Changers Ministries	DEVOTIONAL				
		**Programs identified in two categories subject to CRB determination regarding appropriate category.				

	PROGRAM	PHASE I CATEGORY					
1	Copa FIFA	SPORTS					
2	FIFA Copa del Mundo Sud?frica 2010 Sorteo	SPORTS					
3	FIFA Copa Mundial Femenino	SPORTS					
4	FIFA U-20 World Cup Pre-View Show	SPORTS					
5	FIFA World Cup Draw	SPORTS					
6	FIFA World Cup Qualifying on CBC	SPORTS					
7	FIFA World Cup Soccer	SPORTS					
8	FIFA World Cup Under 20 Draw	SPORTS					
9	FIFA: El F?tbol Ofrece Esperanza	SPORTS					
10	Olympic Marathon Trials	SPORTS					
11	South America World Cup Qualifier	SPORTS					
12	U.S. Olympic Trials	SPORTS					
13	World Cup Soccer	SPORTS					
14	World Cup Soccer: Highlights	SPORTS					

	PROGRAM	PHASE I CATEGORY				
1	2009 Southwest Believers Convention	DEVOTIONAL				
2	3 Days	DEVOTIONAL / PROGRAM SUPPLIERS				
3	A Vow to Cherish	DEVOTIONAL				
4	Adrift	DEVOTIONAL / PROGRAM SUPPLIERS				
5	Aftermath	DEVOTIONAL / PROGRAM SUPPLIERS				
6	Against All Odds	DEVOTIONAL / PROGRAM SUPPLIERS				
7	Amazing Grace	DEVOTIONAL / PROGRAM SUPPLIERS				
8	Americans Feeding Americans	DEVOTIONAL / PROGRAM SUPPLIERS				
9	America's Throwaway Children	DEVOTIONAL / PROGRAM SUPPLIERS				
10	An Eye for an Eye	DEVOTIONAL / PROGRAM SUPPLIERS				
11	Behind Closed Doors	DEVOTIONAL / PROGRAM SUPPLIERS				
12	Believers Voice	DEVOTIONAL				
13	Believers Voice of Victory	DEVOTIONAL				
14	Believer's Voice of Victory	DEVOTIONAL				
15	Believers Voice of Victory Weekly	DEVOTIONAL				
16	Benny Hinn	DEVOTIONAL				
17	Benny Hinn and You	DEVOTIONAL				
18	Benny Hinn Daily	DEVOTIONAL				
19	Benny Hinn Special: Life & Passion of Christ	DEVOTIONAL				
20	Benny Hinn Telethon	DEVOTIONAL				
21	Benny Hinn: Good Friday	DEVOTIONAL				
22	Betrayed	DEVOTIONAL / PROGRAM SUPPLIERS				
23	Betrayed!	DEVOTIONAL / PROGRAM SUPPLIERS				
24	Better Way	DEVOTIONAL / PROGRAM SUPPLIERS				
25	Beyond the Stars	DEVOTIONAL / PROGRAM SUPPLIERS				
26	Billy Graham	DEVOTIONAL				
27	Billy Graham Classic Crusades	DEVOTIONAL				
28	Billy Graham Crusade	DEVOTIONAL				
29	Billy Graham Crusade: Guess Who's Coming	DEVOTIONAL				
30	Billy Graham Ministries	DEVOTIONAL				
31	Billy Graham Special	DEVOTIONAL				
32	Billy Graham Youth Special	DEVOTIONAL				
33	Boomerang	DEVOTIONAL / PROGRAM SUPPLIERS				

34	Breath of Life	DEVOTIONAL				
35	Breath of Life with Walter Pearson	DEVOTIONAL				
36	BVOV	DEVOTIONAL				
37	BVOV Weekly	DEVOTIONAL				
38	Caught	DEVOTIONAL				
39	Changing Your World	DEVOTIONAL				
40	Child Survivors	DEVOTIONAL / PROGRAM SUPPLIERS				
41	Children in Crisis	DEVOTIONAL / PROGRAM SUPPLIERS				
42	Children of Aids: A Global Crisis	DEVOTIONAL / PROGRAM SUPPLIERS				
43	Children On The Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
44	Christmas in July	DEVOTIONAL / PROGRAM SUPPLIERS				
45	Christmas Is	DEVOTIONAL / PROGRAM SUPPLIERS				
46	City That Forgot About Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
47	Class Reunion	DEVOTIONAL / PROGRAM SUPPLIERS				
48	Conspiracy Theory	DEVOTIONAL / PROGRAM SUPPLIERS				
49	Copeland	DEVOTIONAL				
50	Creflo A. Dollar Jr.	DEVOTIONAL				
51	Creflo Dollar	DEVOTIONAL				
52	Creflo Dollar Live	DEVOTIONAL				
53	Creflo Dollar Ministries	DEVOTIONAL				
54	Creflo Dollar: 8 Steps to Create the Life You Want	DEVOTIONAL				
55	Crisis at Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
56	Dark Journey	DEVOTIONAL / PROGRAM SUPPLIERS				
57	DaySpring Visitation With Benny Hinn	Devotional				
58	Dead End	DEVOTIONAL / PROGRAM SUPPLIERS				
59	Decision	DEVOTIONAL / PROGRAM SUPPLIERS				
60	Desperate Households	DEVOTIONAL / PROGRAM SUPPLIERS				
61	Dewey's Magical Sleigh	DEVOTIONAL / PROGRAM SUPPLIERS				
62	Diary	DEVOTIONAL / PROGRAM SUPPLIERS				
63	Dr. Jack Van Impe	DEVOTIONAL				
64	Eagle Mountain International Church	DEVOTIONAL				
65	Easter Is	DEVOTIONAL / PROGRAM SUPPLIERS				
66	Easter Is...	DEVOTIONAL / PROGRAM SUPPLIERS				
67	Easy Money	DEVOTIONAL / PROGRAM SUPPLIERS				

68	Eye of the Storm	DEVOTIONAL / PROGRAM SUPPLIERS				
69	Faith for Today	DEVOTIONAL				
70	Family Affair	DEVOTIONAL / PROGRAM SUPPLIERS				
71	Fathers' Day	DEVOTIONAL / PROGRAM SUPPLIERS				
72	Father's Day	DEVOTIONAL / PROGRAM SUPPLIERS				
73	Feed the Children	DEVOTIONAL / PROGRAM SUPPLIERS				
74	Feed the Children Americans Feeding Americans	DEVOTIONAL / PROGRAM SUPPLIERS				
75	Feed the Children Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
76	Feed the Children Christmas Special	DEVOTIONAL / PROGRAM SUPPLIERS				
77	Feed the Children Holiday Special	DEVOTIONAL / PROGRAM SUPPLIERS				
78	Feed the Children Special	DEVOTIONAL / PROGRAM SUPPLIERS				
79	Feed the Children: An Inconvient Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
80	Firestorm	DEVOTIONAL / PROGRAM SUPPLIERS				
81	Focus	DEVOTIONAL / PROGRAM SUPPLIERS				
82	For Pete's Sake	DEVOTIONAL				
83	Franklin Graham	DEVOTIONAL				
84	Franklin Graham Crusade	DEVOTIONAL				
85	Freedom Is	DEVOTIONAL / PROGRAM SUPPLIERS				
86	Give and Take	DEVOTIONAL / PROGRAM SUPPLIERS				
87	Greatest Gift	DEVOTIONAL / PROGRAM SUPPLIERS				
88	Heartache of Hunger	DEVOTIONAL / PROGRAM SUPPLIERS				
89	Higher Ground	DEVOTIONAL / PROGRAM SUPPLIERS				
90	Home Sweet Home	DEVOTIONAL / PROGRAM SUPPLIERS				
91	Homecoming	DEVOTIONAL / PROGRAM SUPPLIERS				
92	Hope for the Holidays	DEVOTIONAL / PROGRAM SUPPLIERS				
93	Hunger Hurts	DEVOTIONAL / PROGRAM SUPPLIERS				
94	In the Name of Love	DEVOTIONAL / PROGRAM SUPPLIERS				
95	Interlude	DEVOTIONAL / PROGRAM SUPPLIERS				
96	It Is Written	DEVOTIONAL				
97	Jack Van Impe	DEVOTIONAL				
98	Jack Van Impe Presents	DEVOTIONAL				
99	James Robeson	DEVOTIONAL				
100	James Robinson	DEVOTIONAL				
101	James Robison	DEVOTIONAL				

102	James Robison Africa	DEVOTIONAL				
103	James Robison: Sudan	DEVOTIONAL				
104	James T. Meeks	DEVOTIONAL				
105	KCM SW Believers Convention	DEVOTIONAL				
106	Kenneth and Gloria	DEVOTIONAL				
107	Kenneth and Gloria Copeland	DEVOTIONAL				
108	Kenneth Copeland	DEVOTIONAL				
109	Kenneth Copeland Ministries	DEVOTIONAL				
110	Kenneth Copeland Special: Empowered to Succeed	DEVOTIONAL				
111	Kenneth Copeland Weekly	DEVOTIONAL				
112	Kenneth Copeland's Believer's Convention	DEVOTIONAL				
113	Larry Jones	DEVOTIONAL / PROGRAM SUPPLIERS				
114	Larry Jones Americans Feeding Americans	DEVOTIONAL / PROGRAM SUPPLIERS				
115	Larry Jones Christmas Special	DEVOTIONAL / PROGRAM SUPPLIERS				
116	Life Outreach	DEVOTIONAL				
117	Life Today	DEVOTIONAL				
118	Life Today with James Robinson	DEVOTIONAL				
119	Life Today With James Robison	DEVOTIONAL				
120	Lifestyle Magazine	DEVOTIONAL				
121	Lifestyle Magazine Christmas Special	DEVOTIONAL				
122	Lifestyle Magazine Nostalgia	DEVOTIONAL				
123	Lifestyle Magazine Special	DEVOTIONAL				
124	Light in the Darkness	DEVOTIONAL / PROGRAM SUPPLIERS				
125	Like Father, Like Son	DEVOTIONAL / PROGRAM SUPPLIERS				
126	Linda	DEVOTIONAL / PROGRAM SUPPLIERS				
127	Little Shepherd	DEVOTIONAL / PROGRAM SUPPLIERS				
128	Living on the Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
129	Lost and Found	DEVOTIONAL / PROGRAM SUPPLIERS				
130	Man of the Year	DEVOTIONAL / PROGRAM SUPPLIERS				
131	Manna From Heaven	DEVOTIONAL				
132	Masquerade	DEVOTIONAL / PROGRAM SUPPLIERS				
133	Maximize the Moment	DEVOTIONAL / PROGRAM SUPPLIERS				
134	Millie	DEVOTIONAL / PROGRAM SUPPLIERS				
135	Mission Feeding	DEVOTIONAL				

136	More Than Conquerors	DEVOTIONAL / PROGRAM SUPPLIERS				
137	New Harvest	DEVOTIONAL / PROGRAM SUPPLIERS				
138	New Harvest Show	DEVOTIONAL / PROGRAM SUPPLIERS				
139	New Salem Baptist Church	DEVOTIONAL				
140	New Salem Church	DEVOTIONAL				
141	No Greater Love	DEVOTIONAL / PROGRAM SUPPLIERS				
142	No Longer Alone	DEVOTIONAL				
143	No Place to Hide	DEVOTIONAL / PROGRAM SUPPLIERS				
144	No Way Out	DEVOTIONAL / PROGRAM SUPPLIERS				
145	On Main Street	DEVOTIONAL / PROGRAM SUPPLIERS				
146	One Day Makes a Difference	DEVOTIONAL / PROGRAM SUPPLIERS				
147	One Nation Under God	DEVOTIONAL				
148	Other Wise Man	DEVOTIONAL / PROGRAM SUPPLIERS				
149	Out of the Past	DEVOTIONAL / PROGRAM SUPPLIERS				
150	Over the Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
151	Pie in the Sky	DEVOTIONAL / PROGRAM SUPPLIERS				
152	Power Play	DEVOTIONAL				
153	Primary Focus	DEVOTIONAL				
154	Problem Child	DEVOTIONAL / PROGRAM SUPPLIERS				
155	Puzzle Club	DEVOTIONAL / PROGRAM SUPPLIERS				
156	Puzzle Club Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
157	Puzzle Club Christmas Mystery	DEVOTIONAL / PROGRAM SUPPLIERS				
158	Puzzle Club Easter	DEVOTIONAL / PROGRAM SUPPLIERS				
159	Puzzle Club Easter Adventure	DEVOTIONAL / PROGRAM SUPPLIERS				
160	Puzzle Club Pet-Napping Mystery	DEVOTIONAL / PROGRAM SUPPLIERS				
161	Red Boots for Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
162	Repeat Performance	DEVOTIONAL				
163	Revenge	DEVOTIONAL / PROGRAM SUPPLIERS				
164	Reverend Meeks	DEVOTIONAL				
165	Road to Recovery	DEVOTIONAL / PROGRAM SUPPLIERS				
166	Road to Redemption	DEVOTIONAL				
167	Robinson/Colbert	DEVOTIONAL				
168	Robison and Colbert	DEVOTIONAL				
169	Rooted in Gospel	DEVOTIONAL / PROGRAM SUPPLIERS				

170	Salem Baptist	DEVOTIONAL				
171	Salem Baptist Church	DEVOTIONAL				
172	Salem Baptist Church of Chicago, Inc.	DEVOTIONAL				
173	Salem Church	DEVOTIONAL				
174	Second Chance	DEVOTIONAL / PROGRAM SUPPLIERS				
175	Shadow of a Doubt	DEVOTIONAL / PROGRAM SUPPLIERS				
176	Shattered Dreams	DEVOTIONAL / PROGRAM SUPPLIERS				
177	Shield of Faith	DEVOTIONAL / PROGRAM SUPPLIERS				
178	Singsation	DEVOTIONAL / PROGRAM SUPPLIERS				
179	Singsation!	DEVOTIONAL / PROGRAM SUPPLIERS				
180	Singsation! International Gospel Humanitarian Awards	DEVOTIONAL / PROGRAM SUPPLIERS				
181	Singsations	DEVOTIONAL / PROGRAM SUPPLIERS				
182	Smear	DEVOTIONAL / PROGRAM SUPPLIERS				
183	Something to Sing About	DEVOTIONAL				
184	Songs From the Heart	DEVOTIONAL / PROGRAM SUPPLIERS				
185	Songs of the Season	DEVOTIONAL / PROGRAM SUPPLIERS				
186	Southwest Believers Convention	DEVOTIONAL				
187	Stableboy's Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
188	Still Standing	DEVOTIONAL / PROGRAM SUPPLIERS				
189	Sweet Relief	DEVOTIONAL / PROGRAM SUPPLIERS				
190	Tears of Terror	DEVOTIONAL / PROGRAM SUPPLIERS				
191	The Billy Graham Television Special Featuring Franklin Graham	DEVOTIONAL				
192	The Champion	DEVOTIONAL / PROGRAM SUPPLIERS				
193	The City That Forgot About Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
194	The City That Forgot Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
195	The Climb	DEVOTIONAL				
196	The Edge	DEVOTIONAL / PROGRAM SUPPLIERS				
197	The Empty House	DEVOTIONAL / PROGRAM SUPPLIERS				
198	The Greatest Gift	DEVOTIONAL / PROGRAM SUPPLIERS				
199	The Hunger Next Door	DEVOTIONAL / PROGRAM SUPPLIERS				
200	The Message	DEVOTIONAL / PROGRAM SUPPLIERS				
201	The Morning After	DEVOTIONAL / PROGRAM SUPPLIERS				
202	The Morning Show	DEVOTIONAL / PROGRAM SUPPLIERS				

203	The People Next Door	DEVOTIONAL / PROGRAM SUPPLIERS				
204	The Promise	DEVOTIONAL / PROGRAM SUPPLIERS				
205	The Puzzle Club Christmas Mystery	DEVOTIONAL / PROGRAM SUPPLIERS				
206	The Puzzle Club Easter Adventure	DEVOTIONAL / PROGRAM SUPPLIERS				
207	The Stableboy's Christmas	DEVOTIONAL / PROGRAM SUPPLIERS				
208	The Stranger	DEVOTIONAL / PROGRAM SUPPLIERS				
209	The Sure Thing	DEVOTIONAL / PROGRAM SUPPLIERS				
210	The Tie That Binds	DEVOTIONAL / PROGRAM SUPPLIERS				
211	This Is Your Day	DEVOTIONAL				
212	Three Days	DEVOTIONAL / PROGRAM SUPPLIERS				
213	Time for Change	DEVOTIONAL / PROGRAM SUPPLIERS				
214	Tis the Season	DEVOTIONAL / PROGRAM SUPPLIERS				
215	Transition	DEVOTIONAL / PROGRAM SUPPLIERS				
216	Transitions	DEVOTIONAL / PROGRAM SUPPLIERS				
217	Trial by Fire	DEVOTIONAL / PROGRAM SUPPLIERS				
218	Undertow	DEVOTIONAL / PROGRAM SUPPLIERS				
219	Victory	DEVOTIONAL / PROGRAM SUPPLIERS				
220	Voice of Victory	DEVOTIONAL				
221	Wednesday's Child	DEVOTIONAL / PROGRAM SUPPLIERS				
222	When the Bough Breaks	DEVOTIONAL / PROGRAM SUPPLIERS				
223	World Changers Ministries	DEVOTIONAL				
		**Programs identified in two categories subject to CRB determination regarding appropriate category.				

EXHIBIT IPG-3

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Managing Director & Principal

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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, *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

- 2013 Submitted expert report and rebuttal report and provided deposition testimony in the matter of *Virginia Innovation Sciences, Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America LLC*, (United States District Court, Eastern District of Virginia, Norfolk Division Case No. 2:12-CV-548).
- 2013 Submitted expert report and provided trial testimony in the matter of *Distribution of 2000, 2001, 2002, And 2003 Cable Royalty Funds*, (Before the Copyright Office, Library of Congress, 2008-2 CRB CD 2000-2003 (Phase II)).
- 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 <i>Tel-Rom v Pacific Bell Telephone Company and Pacific Bell Public Communications</i> (Los Angeles County Superior Court No. BC 252881)
January 2003	Designated as an expert re economic damages on behalf of Zoasis Corporation for <i>Acree and Hiestand v VCA Antech, Inc., Zoasis Corporation, and Robert Antin</i> (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 <i>Avjet Corporation v Dominguez</i> . (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 <i>Bell v. California State University, San Marcos et al.</i> (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 <i>Colon v. Minnesota Mining and Manufacturing Company, Imation Corp., et al.</i> (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 <i>Martin Klausner vs. First Union Direct Bank, N.A.</i> (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 <i>John Becka v. APCOA/Standard Parking, Inc.</i> (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 <i>City of Moreno Valley Coachella Valley Housing Coalition v. City of Moreno Valley</i> (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 <i>Elliot Schwartz et al. v. Citibank (South Dakota) N.A., Universal Bank, N.A., Universal Financial Corp., et al.</i> (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 <i>Lillian Colores v. California State University, Los Angeles et al.</i>

- 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

Quoted in: Yang, J. L., Hamburger, T. and ElBoghdady, D. (2013, May 6). How 'political intelligence' can come from Congress itself. *The Washington Post*. Retrieved May 30, 2013, from <http://www.washingtonpost.com>.

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 IPG-4

**Hours of IPG Claimed Titles in 1999-2009 by
Distant Subscribers**

<u>Year</u>	<u>Subscriber Category</u>	<u>Hours of Programming</u>		
		<u>Program Suppliers (2000-2009)</u>	<u>Devotional (1999-2009)</u>	<u>Sports (2000-2009)</u>
1999	0 ≤ Subs < 60K	0	82	0
	60K ≤ Subs < 100K	0	0	0
	100K ≤ Subs < 400K	0	0	0
	400K ≤ Subs < 1 MM	0	0	0
	1 MM ≤ Subs < 5 MM	0	90	0
	5 MM ≤ Subs < 10 MM	0	1,058	0
	Subs ≥ 10 MM	0	210	0
Total		0	1,441	0
2000	0 ≤ Subs < 60K	4,792	112	0
	60K ≤ Subs < 100K	2,066	12	0
	100K ≤ Subs < 400K	3,094	69	0
	400K ≤ Subs < 1 MM	187	0	0
	1 MM ≤ Subs < 5 MM	7,501	378	1
	5 MM ≤ Subs < 10 MM	1,420	707	0
	Subs ≥ 10 MM	5,032	251	0
Total		24,093	1,528	1
2001	0 ≤ Subs < 60K	1,708	98	0
	60K ≤ Subs < 100K	9,359	318	0
	100K ≤ Subs < 400K	4,520	105	0
	400K ≤ Subs < 1 MM	1,671	74	0
	1 MM ≤ Subs < 5 MM	3,269	253	0
	5 MM ≤ Subs < 10 MM	1,091	619	0
	Subs ≥ 10 MM	4,565	301	0
Total		26,182	1,766	0
2002	0 ≤ Subs < 60K	4,111	123	48
	60K ≤ Subs < 100K	6,907	310	64
	100K ≤ Subs < 400K	1,233	10	0
	400K ≤ Subs < 1 MM	4,901	280	96
	1 MM ≤ Subs < 5 MM	1,751	117	25
	5 MM ≤ Subs < 10 MM	1,257	605	0
	Subs ≥ 10 MM	4,524	371	48
Total		24,685	1,815	281

Hours of IPG Claimed Titles in 1999-2009 by Distant Subscribers

Year	Subscriber Category	Hours of Programming		
		Program Suppliers (2000-2009)	Devotional (1999-2009)	Sports (2000-2009)
2003	0 ≤ Subs < 60K	869	177	0
	60K ≤ Subs < 100K	1,136	55	0
	100K ≤ Subs < 400K	0	0	0
	400K ≤ Subs < 1 MM	3,692	335	0
	1 MM ≤ Subs < 5 MM	1,098	87	0
	5 MM ≤ Subs < 10 MM	2,380	612	0
	Subs ≥ 10 MM	2,429	216	0
	Total	11,604	1,482	0
2004	0 ≤ Subs < 60K	460	83	0
	60K ≤ Subs < 100K	1,904	198	0
	100K ≤ Subs < 400K	5,078	555	0
	400K ≤ Subs < 1 MM	1,610	137	0
	1 MM ≤ Subs < 5 MM	201	0	0
	5 MM ≤ Subs < 10 MM	2,010	579	0
	Subs ≥ 10 MM	1,945	165	0
	Total	13,208	1,716	0
2005	0 ≤ Subs < 60K	614	23	0
	60K ≤ Subs < 100K	1,654	425	0
	100K ≤ Subs < 400K	2,255	94	0
	400K ≤ Subs < 1 MM	4,093	256	2
	1 MM ≤ Subs < 5 MM	1,053	230	6
	5 MM ≤ Subs < 10 MM	2,747	889	0
	Subs ≥ 10 MM	2,091	234	0
	Total	14,507	2,151	8
2006	0 ≤ Subs < 60K	2,639	157	0
	60K ≤ Subs < 100K	7,227	579	92
	100K ≤ Subs < 400K	5,096	72	125
	400K ≤ Subs < 1 MM	3,199	163	62
	1 MM ≤ Subs < 5 MM	2,995	1,308	0
	5 MM ≤ Subs < 10 MM	2,940	264	31
	Subs ≥ 10 MM	1,720	281	31
	Total	25,815	2,823	341

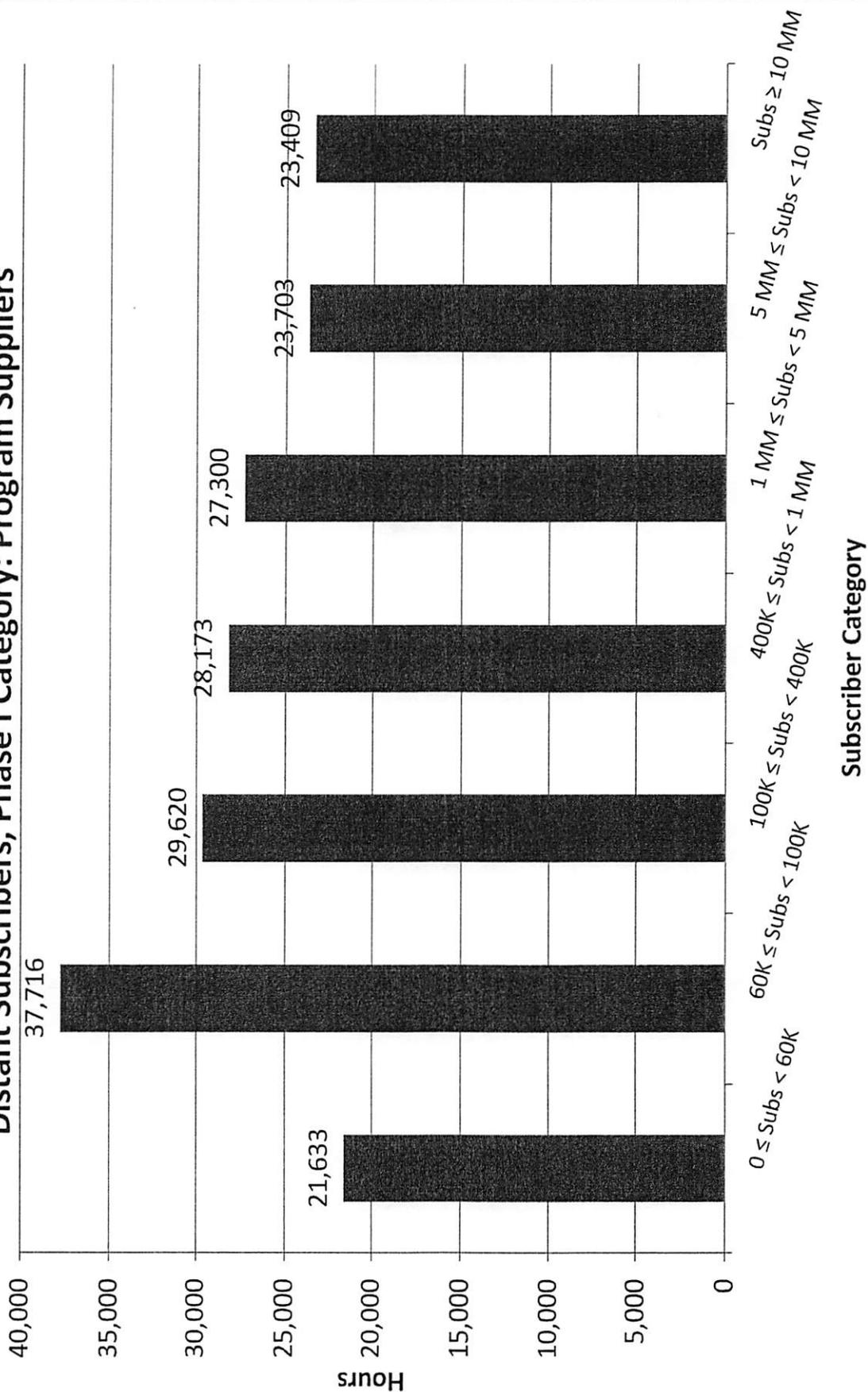
Hours of IPG Claimed Titles in 1999-2009 by Distant Subscribers

Year	Subscriber Category	Hours of Programming		
		Program Suppliers (2000-2009)	Devotional (1999-2009)	Sports (2000-2009)
2007	0 ≤ Subs < 60K	2,822	193	0
	60K ≤ Subs < 100K	1,900	34	0
	100K ≤ Subs < 400K	2,767	440	12
	400K ≤ Subs < 1 MM	2,824	457	42
	1 MM ≤ Subs < 5 MM	3,574	1,509	14
	5 MM ≤ Subs < 10 MM	3,195	188	1
	Subs ≥ 10 MM	675	337	0
	Total	17,757	3,158	69
2008	0 ≤ Subs < 60K	2,545	122	18
	60K ≤ Subs < 100K	2,618	185	18
	100K ≤ Subs < 400K	2,948	709	35
	400K ≤ Subs < 1 MM	2,906	348	53
	1 MM ≤ Subs < 5 MM	2,613	1,293	0
	5 MM ≤ Subs < 10 MM	3,454	535	35
	Subs ≥ 10 MM	278	105	0
	Total	17,362	3,296	158
2009	0 ≤ Subs < 60K	1,073	23	0
	60K ≤ Subs < 100K	2,945	185	0
	100K ≤ Subs < 400K	2,629	578	0
	400K ≤ Subs < 1 MM	3,089	414	0
	1 MM ≤ Subs < 5 MM	3,245	1,055	0
	5 MM ≤ Subs < 10 MM	3,210	235	0
	Subs ≥ 10 MM	150	52	0
	Total	16,340	2,541	0
1999- 2009	0 ≤ Subs < 60K	21,633	1,192	66
	60K ≤ Subs < 100K	37,716	2,301	174
	100K ≤ Subs < 400K	29,620	2,630	172
	400K ≤ Subs < 1 MM	28,173	2,463	255
	1 MM ≤ Subs < 5 MM	27,300	6,318	46
	5 MM ≤ Subs < 10 MM	23,703	6,289	67
	Subs ≥ 10 MM	23,409	2,523	79
	Total	191,553	23,717	858

Note: Hours of broadcasts are calculated by summing the length of the relevant broadcasts in minutes and then dividing by 60.

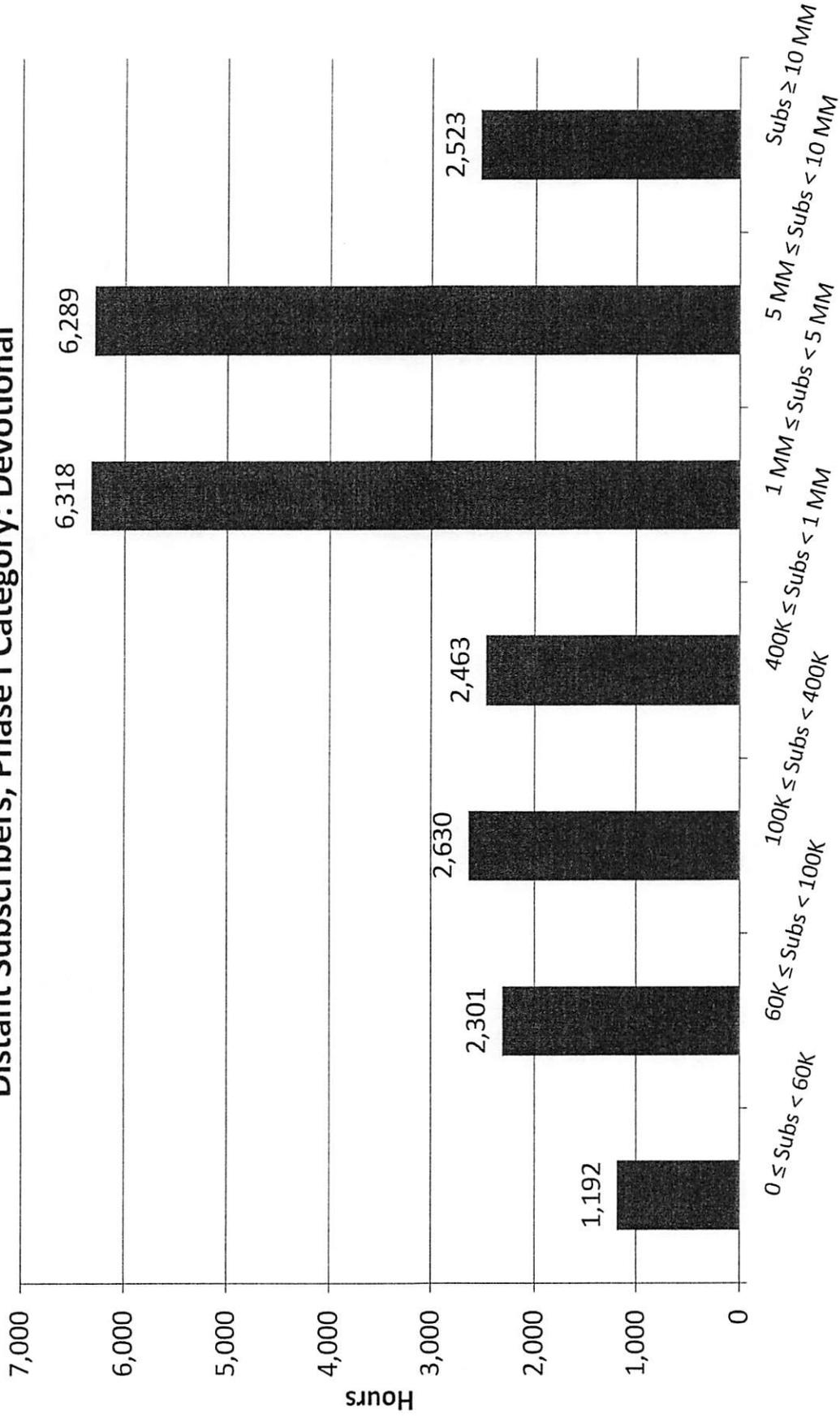
Source: Broadcast data from TV Data (cka Tribune Media). Subscribers from Satellite Statements of Account.

Hours of IPG Claimed Titles in 2000-2009 by Distant Subscribers, Phase I Category: Program Suppliers



Source: Broadcast data from TV Data (aka Tribune Media); subscriber data from Satellite Statements of Account.

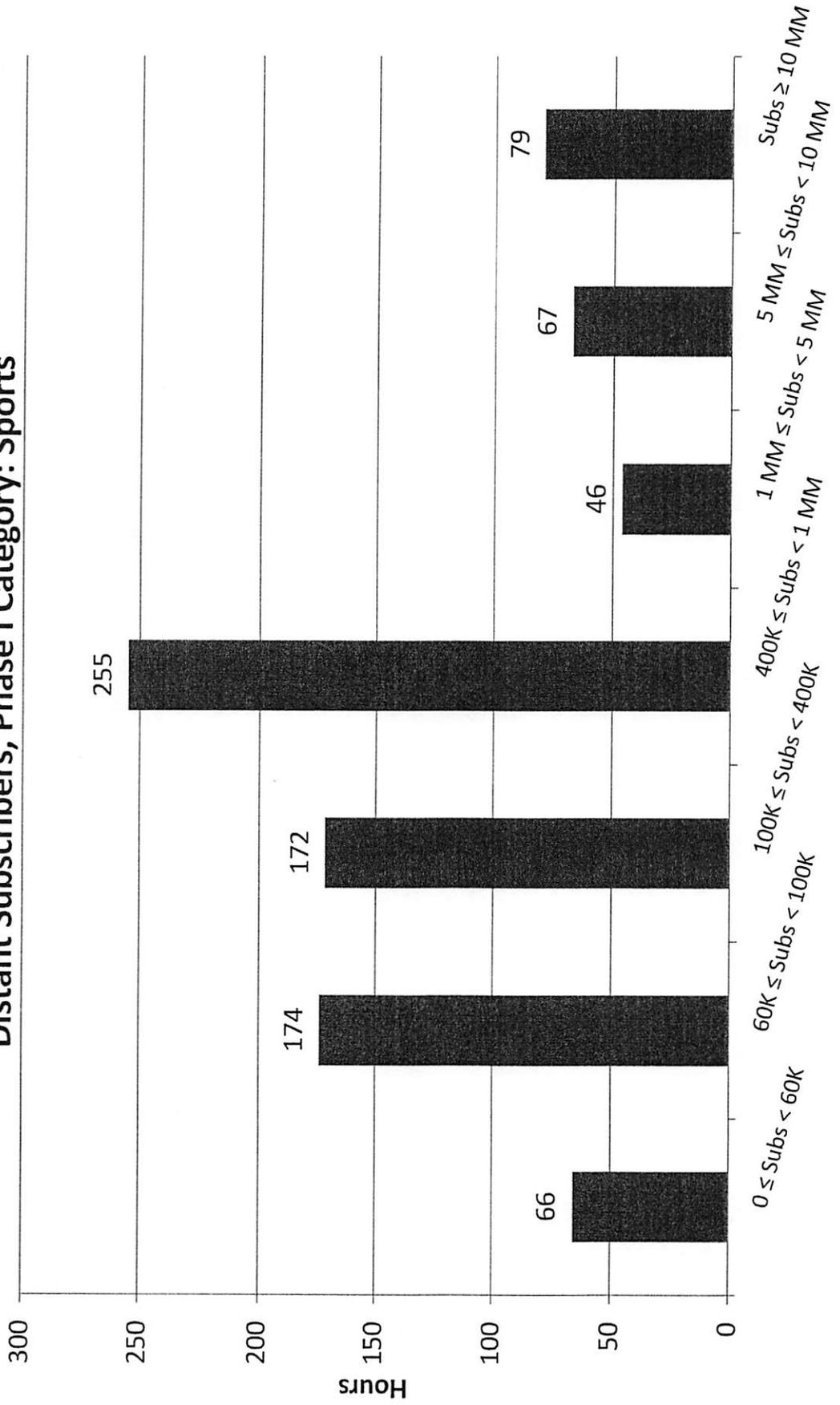
Hours of IPG Claimed Titles in 1999-2009 by Distant Subscribers, Phase I Category: Devotional



Subscriber Category

Source: Broadcast data from TV Data (cka Tribune Media); subscriber data from Satellite Statements of Account.

Hours of IPG Claimed Titles in 2000-2009 by Distant Subscribers, Phase I Category: Sports



Source: Broadcast data from TV Data (aka Tribune Media); subscriber data from Satellite Statements of Account.

EXHIBIT IPG-5

Broadcasts by Quarter Hour, 1999-2009

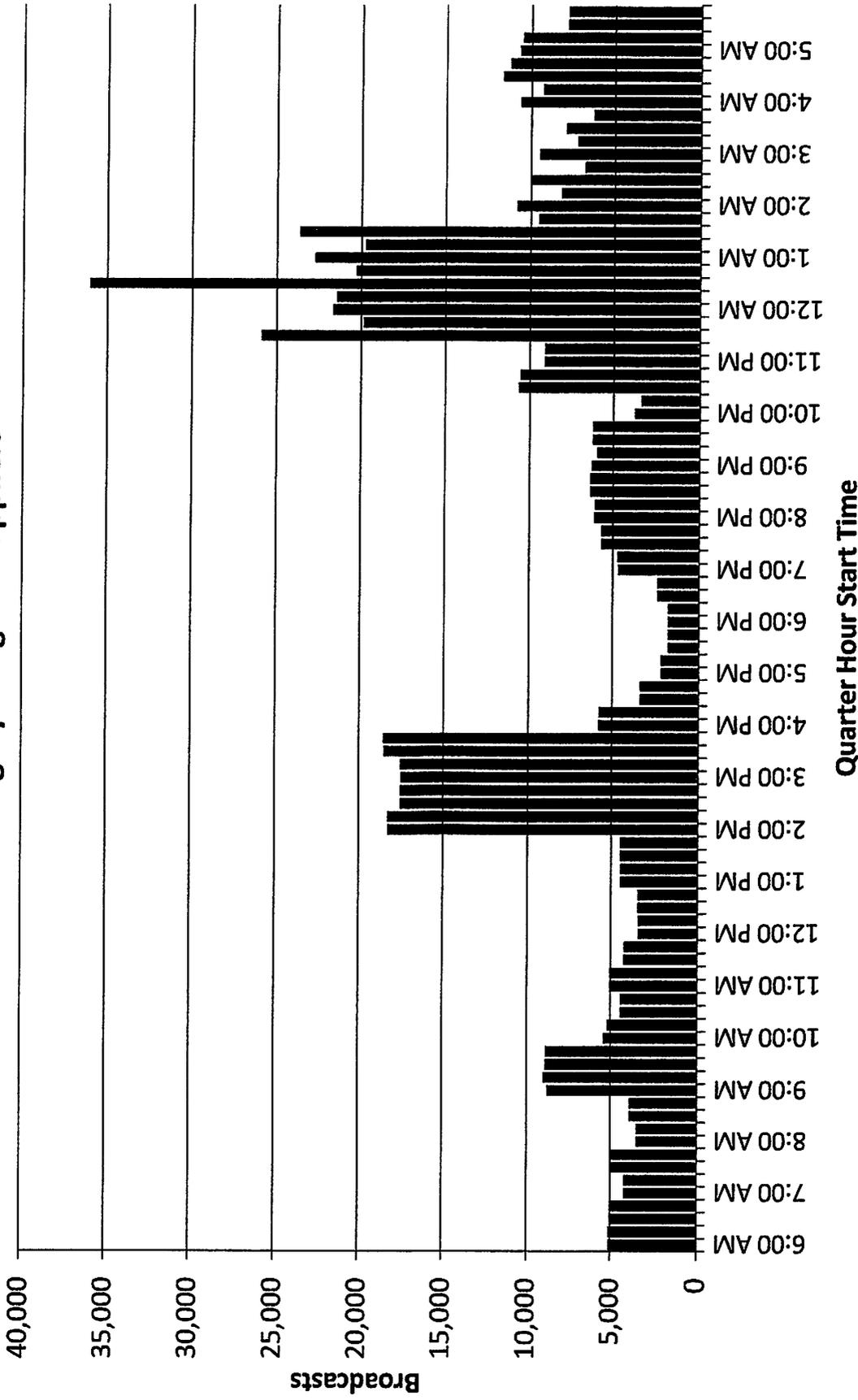
Quarter-Hour Start Time	Quarter-Hour #, 6:00 AM = 1	Broadcasts			Nielsen Quarter Hour Viewership
		Program Suppliers (2000-2009)	Devotional (1999-2009)	Sports (2000-2009)	
6:00 AM	1	5,133	7,254	16	52,820,674
6:15 AM	2	5,133	7,252	16	54,473,516
6:30 AM	3	5,062	8,192	21	68,292,875
6:45 AM	4	5,060	8,191	21	67,651,355
7:00 AM	5	4,218	2,051	24	101,696,423
7:15 AM	6	4,218	2,051	24	104,312,850
7:30 AM	7	5,041	1,975	32	107,477,552
7:45 AM	8	5,041	1,974	32	101,220,803
8:00 AM	9	3,476	2,284	56	104,159,834
8:15 AM	10	3,477	2,284	56	102,431,631
8:30 AM	11	3,906	2,936	63	106,612,061
8:45 AM	12	3,904	2,936	63	104,653,855
9:00 AM	13	8,787	784	61	130,401,354
9:15 AM	14	9,025	784	61	129,630,481
9:30 AM	15	8,918	958	76	134,748,941
9:45 AM	16	8,903	958	76	133,109,441
10:00 AM	17	5,439	203	47	165,024,877
10:15 AM	18	5,221	203	47	164,439,593
10:30 AM	19	4,448	284	72	171,517,659
10:45 AM	20	4,444	284	72	170,788,489
11:00 AM	21	5,057	119	62	175,076,368
11:15 AM	22	5,056	119	62	174,543,847
11:30 AM	23	4,253	66	79	179,404,326
11:45 AM	24	4,250	66	79	177,503,261
12:00 PM	25	3,428	59	81	218,553,997
12:15 PM	26	3,433	59	81	218,256,257
12:30 PM	27	3,461	60	102	227,522,693
12:45 PM	28	3,461	60	102	224,353,448
1:00 PM	29	4,468	154	81	187,091,433
1:15 PM	30	4,467	154	77	187,157,820
1:30 PM	31	4,502	911	99	189,651,079
1:45 PM	32	4,505	911	99	187,629,881
2:00 PM	33	18,281	429	76	180,710,277
2:15 PM	34	18,292	429	73	180,149,771
2:30 PM	35	17,551	251	91	184,604,314
2:45 PM	36	17,548	251	91	182,808,614
3:00 PM	37	17,491	373	79	195,920,881
3:15 PM	38	17,520	373	72	195,993,907
3:30 PM	39	18,499	369	80	205,350,900
3:45 PM	40	18,544	369	80	203,094,947
4:00 PM	41	5,833	1,208	65	273,694,400
4:15 PM	42	5,819	1,208	58	273,379,215
4:30 PM	43	3,376	849	58	283,872,155
4:45 PM	44	3,377	849	58	279,942,376
5:00 PM	45	2,166	334	34	236,332,328
5:15 PM	46	2,173	334	28	239,448,409
5:30 PM	47	1,774	307	22	321,830,920
5:45 PM	48	1,778	307	22	321,325,693
6:00 PM	49	1,769	592	13	241,201,498
6:15 PM	50	1,770	592	9	242,383,955
6:30 PM	51	2,403	692	9	287,077,760
6:45 PM	52	2,407	692	9	288,101,343
7:00 PM	53	4,698	732	39	344,227,135
7:15 PM	54	4,740	732	39	345,986,146
7:30 PM	55	5,699	625	39	334,844,893
7:45 PM	56	5,711	625	39	332,147,096

Broadcasts by Quarter Hour, 1999-2009

Quarter-Hour Start Time	Quarter-Hour #, 6:00 AM = 1	Broadcasts			Nielsen Quarter Hour Viewership
		Program Suppliers (2000-2009)	Devotional (1999-2009)	Sports (2000-2009)	
8:00 PM	57	6,164	585	45	361,600,135
8:15 PM	58	6,116	585	45	362,336,575
8:30 PM	59	6,391	651	45	371,618,120
8:45 PM	60	6,391	651	45	372,182,994
9:00 PM	61	6,305	193	10	415,093,943
9:15 PM	62	6,003	192	10	410,321,057
9:30 PM	63	6,267	392	10	408,943,187
9:45 PM	64	6,265	392	10	402,434,804
10:00 PM	65	3,756	55	3	302,882,032
10:15 PM	66	3,390	54	3	290,194,781
10:30 PM	67	10,672	45	3	274,568,595
10:45 PM	68	10,565	44	3	258,821,664
11:00 PM	69	9,122	8	0	185,984,942
11:15 PM	70	9,090	9	0	177,908,701
11:30 PM	71	25,931	274	1	169,134,392
11:45 PM	72	19,900	284	1	158,597,807
12:00 AM	73	21,693	206	1	130,397,661
12:15 AM	74	21,472	48	1	121,998,153
12:30 AM	75	36,071	358	2	112,979,192
12:45 AM	76	20,310	351	2	102,031,075
1:00 AM	77	22,772	1,279	2	70,576,503
1:15 AM	78	19,789	1,280	2	65,362,002
1:30 AM	79	23,671	309	2	58,637,839
1:45 AM	80	9,525	237	2	54,529,720
2:00 AM	81	10,820	817	2	39,770,660
2:15 AM	82	8,175	823	1	37,127,365
2:30 AM	83	10,046	899	1	33,240,347
2:45 AM	84	6,791	980	1	30,933,871
3:00 AM	85	9,475	757	2	27,136,853
3:15 AM	86	7,243	180	1	25,740,020
3:30 AM	87	7,915	237	4	24,821,208
3:45 AM	88	6,289	223	4	23,510,380
4:00 AM	89	10,622	862	4	33,975,721
4:15 AM	90	9,292	844	4	33,490,989
4:30 AM	91	11,696	1,071	5	33,535,628
4:45 AM	92	11,251	1,048	5	32,836,590
5:00 AM	93	10,682	719	8	20,450,388
5:15 AM	94	10,508	712	8	20,717,646
5:30 AM	95	7,836	3,521	13	25,227,004
5:45 AM	96	7,810	3,517	13	25,764,552
Total		822,496	95,790	3,447	
Average					176,083,882
Weighted Average Viewership, Program Suppliers					152,200,669
Weighted Average Viewership, Devotional					114,356,581
Weighted Average Viewership, Sports					199,095,570

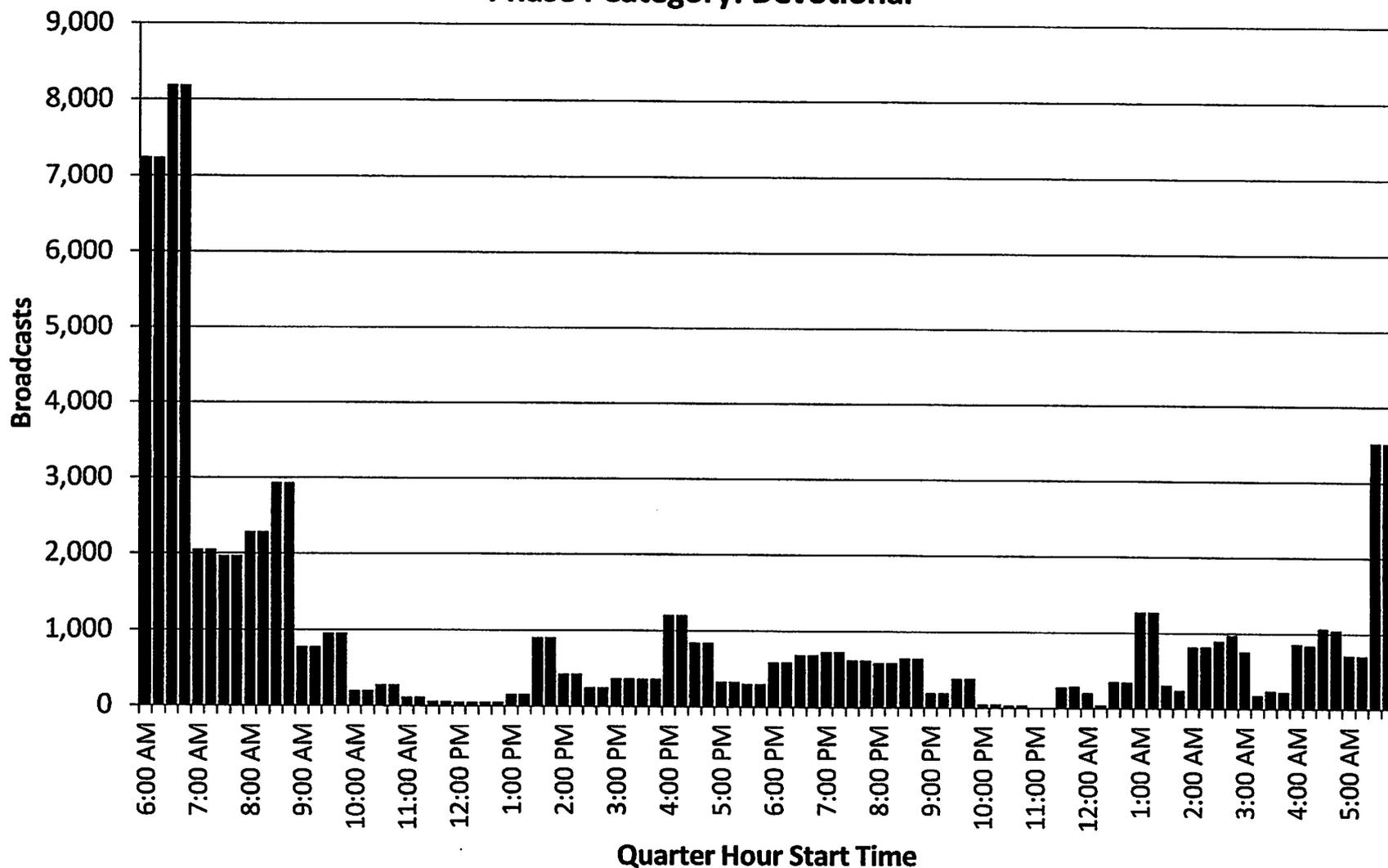
Note: Nielsen Quarter Hour Viewership represents the aggregate viewership for stations included in the MPAA-produced sample of stations from the 2000-2003 cable proceeding.

Quarter Hours of IPG Claimed Titles in 2000-2009, Phase I Category: Program Suppliers



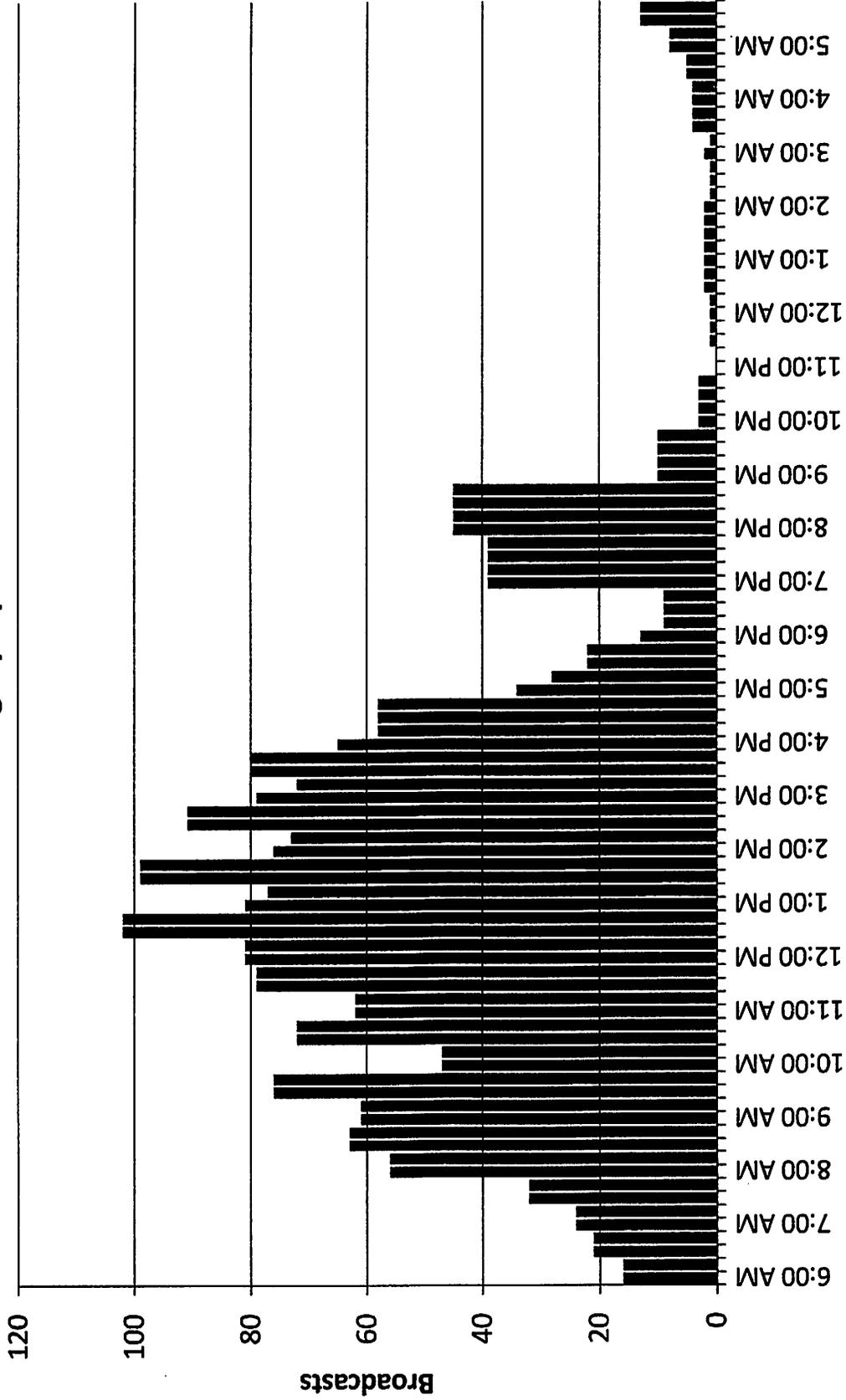
Note: A broadcast is counted for a given quarter hour if it is run during any part of the given quarter hour.
Source: Broadcast data from TV Data (cka Tribune Media).

Quarter Hours of IPG Claimed Titles in 1999-2009, Phase I Category: Devotional



Note: A broadcast is counted for a given quarter hour if it is run during any part of the given quarter hour.
Source: Broadcast data from TV Data (cka Tribune Media).

Quarter Hours of IPG Claimed Titles in 2000-2009, Phase I Category: Sports



Note: A broadcast is counted for a given quarter hour if it is run during any part of the given quarter hour.
Source: Broadcast data from TV Data (cka Tribune Media).

EXHIBIT IPG-6

Weighted Average Distant Subscribers

Year	Average Distant Subscribers, Weighted by # of IPG-Claimed Broadcasts			
	Program Suppliers (2000-2009)	Devotional (1999-2009)	Sports (2000-2009)	Total
1999	-	9,454,142	-	9,454,142
2000	6,736,355	10,926,667	2,445,171	6,708,626
2001	6,093,860	10,308,928	-	6,088,217
2002	6,679,279	13,180,703	3,726,151	6,812,229
2003	10,298,935	15,312,128	-	10,245,930
2004	7,947,200	12,189,740	-	7,908,440
2005	6,726,102	10,437,742	1,228,059	6,870,989
2006	4,274,240	9,165,729	2,142,386	4,614,348
2007	5,456,475	8,023,314	1,154,668	5,791,902
2008	4,277,618	5,986,737	1,846,402	4,360,230
2009	3,322,310	4,972,079	-	3,209,483
1999-2009	6,008,929	9,380,274	2,416,718	6,135,249

Year	Average Distant Subscribers, Weighted by Hours of IPG-Claimed Programming			
	Program Suppliers (2000-2009)	Devotional (1999-2009)	Sports (2000-2009)	Total
1999	-	9,441,603	-	9,441,603
2000	6,384,036	10,855,437	2,445,171	6,379,171
2001	5,541,572	9,886,693	-	5,568,240
2002	6,019,994	12,860,210	3,775,571	6,117,262
2003	9,515,297	15,068,417	-	9,535,334
2004	7,158,951	12,361,434	-	7,191,057
2005	6,215,725	10,218,260	1,228,059	6,371,546
2006	3,618,907	9,036,377	2,151,517	3,888,213
2007	4,595,448	8,111,077	1,026,683	4,898,918
2008	3,673,069	6,066,550	1,846,402	3,764,465
2009	2,970,294	4,832,000	-	2,919,440
1999-2009	5,376,976	9,272,389	2,529,884	5,501,568

Source: Broadcast data from TV Data (aka Tribune Media).