

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)
)
) Docket No. 2011-7-6 CRB CD 2009
Distribution of the)
2009 Cable Royalty Funds)
)
)

Comments of Devotional Claimants

On behalf of the Devotional Claimants,¹ we hereby submit these comments in connection with Notice announcing partial Phase I settlement and soliciting comments on motion for partial distribution published at 76 Fed. Reg. 55122 (September 6, 2011) (“Notice”).

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

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

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

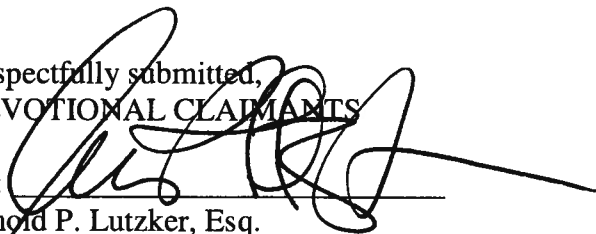
II. Phase I

As noted in the Comments of The Phase I Parties, there is no settlement of Phase I claims for 2009; however, the Parties are in the process of negotiating an agreement that they believe will resolve the existing controversy. In the event a Phase I settlement is not achieved and a proceeding is initiated, Devotional Claimants may assert a claim of 10% or less of the royalty pool.²

III. Phase II

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

Respectfully submitted,
DEVOTIONAL CLAIMANTS

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² Nevertheless, in light of the Phase I Parties' commitment to return any excess amounts to the extent necessary to comply with the final determination on the distribution of the fees, this potential claim does not require the CRB to reserve any additional funds beyond the 50% set forth in the Motion.

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October 6, 2011

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October 2011, a copy of the foregoing Comments of the Devotional Claimants for Partial Distribution of the 2009 Cable Royalty Funds was sent by Federal Express to the individual listed below:

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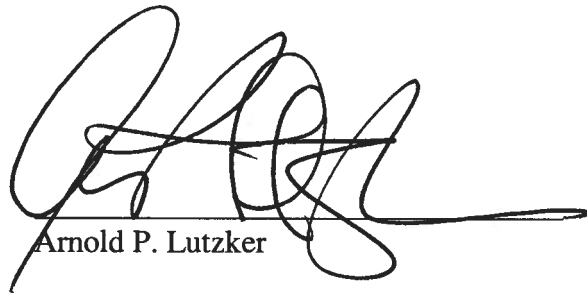
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