

**Before the
COPYRIGHT OFFICE
LIBRARY OF CONGRESS
Washington, D.C.**

In the Matter of)
Cable Compulsory Licensing)
Reporting Practices)
_____)

Docket No. RM 2005-6

REPLY COMMENTS OF THE PUBLIC BROADCASTING SERVICE

The Public Broadcasting Service (“PBS”), through its counsel, submits these reply comments in response to the Notice of Inquiry (“NOI”) issued by the Copyright Office (the “Office”) on August 10, 2006. *See Cable Compulsory Licensing Reporting Practices*, 71 Fed. Reg. 45749 (Aug. 10, 2006). PBS submits these comments on behalf of public television stations and the copyright owners of programs broadcast by public television stations and secondarily retransmitted by cable systems pursuant to the Section 111 compulsory license.

PBS joins in and supports the comments and reply comments submitted by the National Association of Broadcasters (“NAB”). PBS also supports the comments and reply comments submitted by the Program Suppliers to the extent those comments are consistent with and provide further support for the comments submitted by NAB.

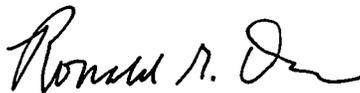
In short, PBS agrees that it is critical for the Statement of Account (“SOA”) form to be clear and to comport more directly with the legal requirements and the marketplace practices that have developed over the years since the forms were last overhauled. For these reasons, and those stated in NAB’s and Program Suppliers’

comments, PBS supports the changes proposed in the NOI to the information reported on cable SOA forms.

PBS also agrees with Program Suppliers that the Office should reject commenter NCTA's attempts to incorporate its other separate petitions for rulemaking into this proceeding. The issues raised in NCTA's petitions are neither a part, nor a logical outgrowth, of this proceeding, and should be addressed, if at all, under separate dockets.

Respectfully submitted,

PUBLIC BROADCASTING SERVICE

By: 

Ronald G. Dove, Jr.

COVINGTON & BURLING LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
Telephone: (202) 662-5685
Facsimile: (202) 778-5685
Email: rdove@cov.com

Its Counsel

October 24, 2006