

relevant statement of account). Specifically, according to the statements of account provided by the Office, all but one of the amended statements requesting or implying the right to a refund were filed outside the sixty-day period specified in the rules.

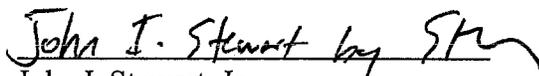
Under these circumstances, and relying upon the information provided by the Copyright Office, Copyright Owners (like Program Suppliers) take no position on the issue raised in the NPRM. The Copyright Owners agree with Program Suppliers that each of the untimely refund requests should be denied solely on the basis that it is untimely and without regard to whether the request is inconsistent with STELA.

Respectfully submitted,

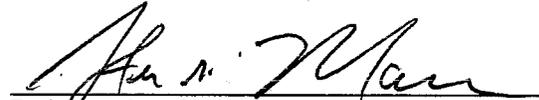
**COMMERCIAL TELEVISION
CLAIMANTS**

JOINT SPORTS CLAIMANTS

**NATIONAL ASSOCIATION OF
BROADCASTERS**



John I. Stewart, Jr.
DC Bar No. 913905
Jennifer H. Burdman
DC Bar No. 495555
Ann Mace
DC Bar No. 980845
CROWELL & MORING LLP
1001 Pennsylvania Ave., NW
Washington, DC 20004-2595
Telephone: (202) 624-2685
Fax: (202) 628-5116
jstewart@crowell.com



Robert Alan Garrett
DC Bar No. 239681
Stephen K. Marsh
DC Bar No. 470765
ARNOLD & PORTER LLP
555 Twelfth Street, NW
Washington, DC 20004-1206
Telephone: (202) 942-5000
Fax: (202) 942-5999
robert.garrett@aporter.com
stephen.marsh@aporter.com

MUSIC CLAIMANTS

AMERICAN SOCIETY OF COMPOSERS, BROADCAST MUSIC, INC.
AUTHORS AND PUBLISHERS

Samuel Mosenkis by SKM
Joan M. McGivern
Samuel Mosenkis
N.Y.# 2628915
ASCAP
One Lincoln Plaza
New York, NY 10023
Telephone: (212) 621-6450
Fax: (212) 787-1381
smosenkis@ascap.com

Joseph J. DiMona by SKM
Marvin L. Berenson
Joseph J. DiMona
DC Bar No. 412159
BROADCAST MUSIC, INC.
7 World Trade Center
250 Greenwich Street
New York, NY 10007-0030
Telephone: (212) 220-3149
Fax: (212) 220-4447
jdimona@bmi.com

SESAC, INC.

John C. Beiter by SKM
John C. Beiter
TN Bar No. 12564
ZUMWALT, ALMON & HAYES PLLC
1014 16th Avenue South
Nashville, TN 37212
Telephone: (615) 850-2291
Fax: (202) 256-7106

Michael J. Remington by SKM
Michael J. Remington
DC Bar No. 344127
Jeffrey J. Lopez
DC Bar No. 453052
Philip J. Cardinale
DC Bar No. 979949
DRINKER BIDDLE & REATH LLP
1500 K Street, NW – Suite 1100
Washington, DC 20005
Telephone: (202) 842-8800
Fax: (202) 842-8465
michael.remington@dbr.com

DEVOTIONAL CLAIMANTS

Arnold P. Lutzker by SK

Arnold P. Lutzker

DC Bar No. 101816

LUTZKER & LUTZKER LLP

1233 20th Street, NW, Suite 703

Washington, DC 20036

Telephone: (202) 408-7600

Fax: (202) 408-7677

arnie@lutzker.com

CANADIAN CLAIMANTS

L. Kendall Satterfield by SK

L. Kendall Satterfield

DC Bar No. 393953

FINKELSTEIN THOMPSON LLP

1050 30th Street NW

Washington, DC 20007

Telephone: (202) 337-8000

Fax: (202) 337-8090

ksatterfield@finkelsteinthompson.com

Dated: December 3, 2010

CERTIFICATE OF SERVICE

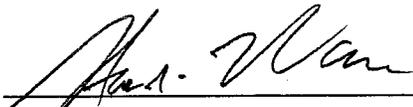
I, Stephen K. Marsh, hereby certify that on this 3rd day of December, 2010, a copy of the foregoing Reply Comments of Copyright Owners on Notice of Proposed Rulemaking was sent by first-class U.S. mail to the individuals listed below:

PROGRAM SUPPLIERS

Gregory O. Olaniran
Lucy Holmes Plovnick
MITCHELL SILBERBERG & KNUPP LLP
1818 N Street, NW, 8th Floor
Washington, DC 20036

NATIONAL CABLE & TELECOMMUNICATIONS ASSOCIATION

Seth A. Davidson
Fleischman and Harding LLP
1255 23rd Street, N.W., Eighth Floor
Washington, D.C. 20037



Stephen K. Marsh