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**COPYRIGHT LAW AND SPORTS- AN INTERCONNECTION FROM BROADCASTING
LIVE SPORTING EVENTS TO SIGNATURE SPORTS MOVES**

Naman Khanna¹

Abstract

The realm of sports is really no stranger to intellectual property law. The sporting world is no longer limited to a couple of passionate individuals on the field and has developed into a multibillion-dollar enterprise. Broadcasting sports coverage has now been transformed by breakthroughs in communications technology, allowing billions of people across the world to experience the spectacle and thrill of major sporting events. This paper analyses the interrelationship of broadcasting live sporting events and copyright law with the help of landmark cases. Amidst the coronavirus pandemic and the subsequent, the unauthorized sharing of copyrighted content of sporting events on social media has skyrocketed. This paper thus also looks at whether uploading sports clips on social media is considered copyright infringement or amounts to fair use under Indian copyright laws. Lastly, the paper analyses copyright in sports from an athlete's perspective. The lack of any original or inventive form of expression due to sports' rule-bound nature, the lack of certainty of a match's or tournaments final outcome, and the lack of a pre-planned narrative are all frequently cited explanations that have led courts and broadcasters to believe that sports moves and performances are not copyrightable. This paper thus also discusses if an athlete can copyright his or her signature sports move and whether they can claim copyright in their sporting performances or not from an international perspective.

¹ 4th Year, Symbiosis Law School, Pune

KEYWORDS- Copyright, Broadcasting, Live events, Sports moves, Athletes, Performance rights.

INTRODUCTION

The Indian sports sector has slowly developed to become one of the biggest sectors in the world, comprising entertainment, activities, culture, as well as financial transactions. Sports used to be merely activities that people played for fun or as a pastime in their free time, but in the past few decades, commercial participation in sports has grown, prompting the need for some sort of protection in order to attain the financial benefits.

Over the years, regulations and legislations have been developed as India has become an enormous setting for holding various national and international sporting events. Numerous issues pertaining to intellectual property have grown increasingly prominent as the sports industry gets more commercialized. All copyrightable subject-matter now includes the promotion and advertising of championships and sports events, the artistic designs of sports teams' and tournaments' symbols, the content included in in-game day programs provided to viewers and followers, merchandising, and digital technology and their game software.

Despite their enormous appeal, sports did not achieve general recognition until they began to be broadcast on various forms of media. In India, the Copyright Act safeguards broadcasting and performer's rights. Aside from that, the Indian Court has stepped in to assist in the development of sports law. However, courts have been reluctant to rule on issues concerning sports broadcasting as well as various subjects related to sports and copyright law.

There is no specific legislation in India that addresses problems relating to the sports industry. As a result, it is controlled by a variety of statutes. Copyright has become extremely pivotal for protection as a result of the monetization and exploitation of commercial aspects of sportsmen as well as sporting events. It is essential for the protection of many components of the game, such as logos, marketing, slogans, and images. All of these things are protected in India by the Copyright Act of 1957. It also protects broadcasting and performance rights as connected or neighbouring rights. The copyright law in India is fairly broad, enabling both authors and society to express themselves creatively. To retain high levels of interest, sports organisations depend on income from broadcasting as well as media rights to build stadiums, organize sporting events, and participate in community development. Major athletic events are now streamed or broadcast live across the world, allowing millions of fans to join in the thrill. Copyrights, along with neighbouring rights, protect unlicensed broadcasts and help to maintain

the sports-television media connection. This paper not only discusses copyright in the broadcasting realm but also how it affects the upload of old sports clips on social media and whether an athlete's signature move can be copyrighted while also giving an international perspective using landmark cases.

THE INTERRELATIONSHIP OF BROADCASTING SPORTING EVENTS & COPYRIGHT LAW

The issue of marketing and broadcasting has emerged as the sports industry in India has grown. When any sport is broadcasted or screened, the broadcasting right becomes incredibly important. A unique set of rights is recognized by the Indian Copyright Act of 1957 when it comes to broadcasting. Without the authorization of a sporting league or corporation, no one has the power to broadcast or transmit copyrighted and licensed professional sporting events and tournaments. The broadcasting corporations control the broadcasting rights, which means they may rebroadcast and re-telecast it as often as they choose. As per the Indian Copyright Act, 1957, anyone who, without the consent of the actual owner, broadcasts or curates a work which has already been broadcasted or published, replicates the work without assignment, replicates the sound or reproduces the work by visual recording, distributes or employs to the public, or provides for such sale or hire, has infringed the broadcasting rights.² According to Section 51 of the 1957 Copyright Act, broadcasting without the owner's consent is deemed an infringement. Sporting events are now aired all around the world thanks to technological developments. Initially, the Copyright Act did not include a clause protecting broadcasters' and live performers' rights. Sections 37 and 38 of the Act were repealed in 1994, and a new section was introduced to include broadcasting reproduction rights as well as performer's rights.

All content rights owners must distribute broadcast signals of nationally important sporting events without advertisements with Prasar Bharti in order for them to rebroadcast them on their terrestrial and DTH networks, according to Section 3 of the Sports Broadcasting Signals (Mandatory Sharing with Prasar Bharti) Act, 2007. This law was enacted was designed to facilitate a large number of people to watch important national sporting events. The Act, on the other hand, is discriminatory in that it puts private businesses at a disadvantage by compelling them to invest billions of rupees in order to get exclusive broadcasting rights to events. The three major cases related to broadcasting of live sporting events involving copyright law have been discussed below.

² India Copyright Act, 1957, Section 52.

❖ *ESPN STARS SPORTS V. GLOBAL BROADCAST NEWS LIMITED*

In this case³, the plaintiff, ESPN Stars Sports, decided to seek a permanent injunction against the defendants, Global Broadcast News Ltd. and Ors, to prevent and deter the defendant news channels from using Plaintiff's footage in the subsequent India vs Australia test series, T-20 series, and ODIs involving Sri Lanka, India, and Australia without prior authorization from the Plaintiff and thus was in violation of the terms and conditions set out by the plaintiff. This application was an appeal against a previous ruling in the defendant news networks' favour. The previous decision dismissing the lawsuit was centred on the Plaintiff Broadcasting Organization's failure to bring the owner of the broadcasting right to court, as prescribed under Section 61 of the Copyright Act, as the exclusive and only licensee of the disputed broadcast.

The appeal was centred on the premise that broadcasting organizations' rights are treated as "related rights" instead of copyrights as per the Copyright Act. Due to their unique location and nature, only Chapter VIII that is Sections 37-39A of the Copyright Act oversees these rights. As a consequence, because Section 61's application to broadcasting rights and infringement proceedings is not mentioned in Chapter VIII of the Act, it is not applicable to an infringement action initiated by an exclusive licensee of such a broadcasting organization.

Consequently, the Court of First Instance made an error in finding that Section 61 extends to infringement lawsuits brought by broadcasting corporations functioning as exclusive licensees. The plaintiff argued it entered into an exclusive licensing arrangement under which it was awarded exclusive rights to broadcast live, postponed as well as paid cricket feeds on terrestrial, cable and satellite television in India and many other selected countries. The defendants were accused of taking the material and turning it into a commercially exploitable programme. As a result, the plaintiff sought an injunction barring them from utilizing the plaintiff's material in the future. Since the case was ultimately rejected on technical grounds, the question of copyright in live sports broadcasts still remained somewhat unresolved.

❖ *ESPN SOFTWARE INDIA PRIVATE LIMITED. VS. TUDU ENTERPRISE*

This case involves the unauthorized Transmission of an Event as defined under Section 37(3) of the Copyright Act of 1957. The defendants were broadcasting the plaintiff's networks

³ ESPN Stars Sports v. Global Broadcast News Ltd. and Ors RFA (OS) No.25/2008

streams and displaying events to their subscribers without the plaintiff's permission and without signing into contracts either with the distributor or the plaintiff. This was a violation of the plaintiff's broadcast reproduction right. The court had to assess whether the defendant's act of unauthorized transmitting the plaintiff's network channels was justifiable or not.

Additionally, the unauthorized transmission of the plaintiff's reproduction rights via unlawfully transmitted signals to India in the manner described above was illegal, unjust, and should be barred. The defendants in the case had not entered into any licensing agreements with the plaintiff's distributors and were not authorized to transmit channels via their cable operators, thus their transmission was not justifiable as per Section 37(3) of the Copyright Act, 1957. According to section 37(3) of Indian Copyright Act, 1957, rights to distribute live sports events are an infringement of the official broadcaster's copyright. However, when we understand the meaning and provisions of this Act, it is clear that there really is no statutory requirement related to copyright in live sports events.

❖ *STAR INDIA PRIVATE LIMITED & ANOTHER. V. HANEETH UJWAL & OTHERS*

The plaintiff in the case of Star India Pvt. Ltd. & Anr. V. Haneeth Ujjwal & Ors sought for Internet Service Providers to restrict and disable over a hundred websites and other similar websites that broadcast Star India Private Limited's material. The plaintiff claimed that blocking specific URLs containing pirated material would be inadequate since websites could always broadcast illegal content by changing one letter or character in the whole URL configuration. The defendants were alleged to be based all around the planet and to own, run, and govern the numerous websites named in the notice of parties. It was virtually hard to track down the proprietors of many of these websites since they were anonymous. The Delhi High Court issued a John Doe order preventing the defendants from hosting, uploading, transmitting, rebroadcasting, retransmission, displaying, making available for viewing and downloading files, gaining access to and communicating with the public along with its subscribers and users through telecommunication services owing to the complexity in trying to identify all of the defendants.

Specifically in regard to live cricket telecasts, the Delhi High Court held that instead of restricting a single URL, websites that predominantly provide pirated content should be blocked completely. Moreover, anybody who wilfully distributes, imports for distribution, telecasts, or transmits to the public, without authorisation, copies of any work or performance fully understanding that electronic rights management information has been removed or

modified without authorisation is subject to a two-year prison term and a monetary fine under Section 65B of the Copyright Act of 1957.

DOES UPLOAD OF SPORTS CLIPS ON SOCIAL MEDIA COME WITHIN THE AMBIT OF COPYRIGHT?

During the pandemic and the ensuing lockdown, there has been a spike in internet multimedia sharing. Unauthorized sharing of copyrighted content is also a component of this and the sharing of sporting clips is amongst the top shared. The majority of judicial decisions in India involving the upload of sports footage have dealt with broadcasting or sharing information about live events. In these instances, unlike when old footage are shared, copyright owners have additional issues about their capacity to monetise the material or broadcast. When it comes to old footage from a sporting event that the licensee is not monetising and potentially does not plan to monetise, the situation is different. For example, the BCCI or ICC owns the copyright on a number of highlights from previous cricket matches.

The section 52(1)(a) of India's Copyright Act, 1957 Act, which deals with the fair dealing exception to copyright infringement, is essential to understand. It entails the fulfilment of two requirements: "fair dealing" with any work and "fair dealing" for one of the objectives listed in the clause including for private or personal use, criticism or review, the reporting of current events and current affairs.

❖ ANALYSIS OF THE UPLOADING OF OLD SPORTS CLIPS WITH REEPECT TO FAIR DEALING

In the case *India TV Independent News Service v. Yashraj Films*⁴, the term "fair dealing" was interpreted to include the four-factor test used in the United States:-

1. The purpose and nature of the usage, specifically whether it is for commercial or educational purposes.
2. The copyrighted work's nature.
3. In respect to the copyrighted work as a whole, the amount and significance of the piece copied.
4. The impact of the use on the copyrighted work's potential market or valuation.

⁴ *India TV Independent News Service v. Yashraj Films* 2013 (53) PTC 586 (Del).

The vast majority of sports video shared on social media are shared for non-commercial motives with no intention of monetizing them. In terms of the nature of the usage, even if it is just using a piece of the copyrighted work, it may be claimed that a significant amount of it is transformative. This is due to the value gained in the curation, categorization, and compilation of material, such as a player's wickets taken throughout several matches or a player's dismissals in a specific style across multiple matches when it comes to cricket. Exercising expertise and judgment in editing a player's or a team's performance in a given match or series, for example, transforms the new work. The nature of the work required is factual rather than artistic, bolstering the four-factor test's applicability. Furthermore, the majority of these clips are very short in length, economically negligible in comparison to the original work, and, in many cases, aesthetically insignificant in comparison to the original work. Finally, because the rights holders aren't selling these old snippets in any way, it has no effect on the prospective market for the works. Rather, they allow for an increase in the popularity of the sport, which increases the market for the rights holder's works.

❖ *DETERMINING WHETHER THE USE IS FOR ANY OF THE THREE PURPOSES MENTIONED IN THE SECTION.*

It would be difficult to consider the usage of sports video uploaded to social media to be completely private or personal. The third provision of the clause, which deals with current events, is likewise ruled out because the focus of this work is on old footage. The question is whether these clips are covered by the second provision of the clause which deals with criticism or review.

In this context, the decision in *Super Cassettes v. Hamar Television Network*⁵ should be noted, in which the court summarized certain fair dealing principles when dealing with an injunction claim by T-Series against the defendant's broadcasts. The court noted that all courts should take a liberal approach in determining what constitutes "current events" reporting or what falls within the scope of "criticism" or "review." Also, in the *Narendra Publishing House*⁶ case, the Delhi High Court interpreted the definition of the term "review" as given in the Shorter Oxford Dictionary, which defines it as "view, examine, or evaluate a second time or again...", and held that a handbook was a re-examination of a mathematical work, and thus a "review." Therefore, the court looked to be concentrating on the aspect of work examination.

⁵ *Super Cassettes v. Hamar Television Network* (2011) 45 PTC 70 (Del).

⁶ *The Chancellor Masters & Scholars v. Narendra Publishing House* 2008 (38) PTC 385 (Del).

Using the reasoning from both of the above cases, social media clips may be deemed "criticism" or "review" of the original work. This is because such a usage may be construed as a second look at a certain sporting event, with the goal of continuing a conversation or an examination of it. In such a situation the attention isn't on the event itself, but on the debate sparked by the review, or on a re-examination of the entire work via a new and different perspective.

Though, as per the preceding analysis, sharing clips of sporting events with opinions that create debate may come within the scope of "fair dealing," sufficient protection for individuals uploading sports clips to social media, much still remains to be desired. Even if it involves substantial curation efforts on the part of the uploader, a simple copy of such video without any comments may not be protected by this exemption, and so may be vulnerable to copyright infringement charges. This highlights the Indian regime's shortcomings in terms of "fair dealing."

SIGNATURE SPORTS MOVES AND COPYRIGHT LAW

The integration of sports in the scope of intellectual property protection has been a source of contention for some time. Every trademark and iconic sports move ever developed, from the classic 'Cruyff Turn'⁷ to the 'Jordan Fadeaway'⁸ and 'MS Dhoni's Helicopter Shot'⁹ has an indisputable degree of inventiveness and technique that makes it distinct. These manoeuvres are seen to be exceptional in execution and vital to an athlete's accomplishments in their respective sports. The recognition of such sporting manoeuvres as a creative work has the potential to transform not just the way a sport is played, but also the life of star players.

Originality and expression of the idea or concept in a material form are the two main requirements that must be met for a work to be protected under the Indian Copyright Act, 1957. Therefore, it is the practical application of the idea in some tangible form that entitles a creator to a copyright, not necessarily the uniqueness of the idea. An original work must be the result of "an exercise of skill as well as judgement," with skill referring to "the use of one's knowledge, evolved ability, or practised ability in producing the work" and judgement referring

⁷ Mark White, Simplicity matters: how did the Cruyff Turn become so iconic?, FourFourTwo, (June 19, 2020), <https://www.fourfourtwo.com/features/johan-cruyff-turn-anniversary-netherlands-skill-date-world-cup-sweden-defender>

⁸ Scott Rafferty, One Play: The simplicity and effectiveness of Michael Jordan's iconic fadeaway, NBA, (February 17, 2021), <https://ca.nba.com/news/the-last-dance-chicago-bulls-one-play-the-simplicity-and-effectiveness-of-michael-jordans-iconic-fadeaway/hdcpjf6mjj3d1v5wvu0oki08z>

⁹ Bastab Parida, The story behind MS Dhoni's helicopter shot, Sportscafe, (March 4, 2020), <https://www.deccanherald.com/sports/cricket/ms-dhonis-helicopter-shot-inspired-chocolates-to-hit-markets-soon-970960.html>

to "the use of one's capability for distinction or ability to form an opinion or assessment by comparing different possible options in creating the work."¹⁰ The US Supreme Court developed the doctrine of "modicum of creativity"¹¹, which stipulates that a minimum level of inventiveness is necessary to determine that an author's work qualifies for protection. This doctrine has been largely adopted by Indian courts.¹² By definition, creative works are unique and original and are protected by copyright, but creativity is not essential to make a work original or unique.

A perfect example of a signature sports move is the Rafael Nadal Forehand¹³. It is a one-of-a-kind manoeuvre that has led to Rafael Nadal's multiple victories and trophies. It's distinguished by his racket being positioned underneath the ball, allowing him to brush the ball with his racket pointing upwards, resulting in a vicious spin. He pulls his legs off the ground at the same time, driving his body upwards and creating a strong topspin. As a consequence, his opponents are rendered helpless by a swirling, looping and spinning shot. This specific demonstrates creativity, dedication, and, most importantly, a certain skill set. Under copyright law, a work can be called "original" even if the author drew on common knowledge among himself and others or used previously existing content. This implies that just because the 'forehand' is a well-known technique doesn't mean the 'Nadal Forehand' can't be copyrightable.

When a sportsman creates a new sports move, he or she is drawing on his or her own unique experiences and abilities, and the result of his efforts is merely an expression of himself as an athlete. As per the Copyright Act of 1957, a sportsperson can also be deemed a "performer," as its term includes "any other person that makes a performance." A live visual or auditory presentation by one or more performers is referred to as a performance.¹⁴ Almost every sport is now televised live, and it is hard to dispute their massive global viewership, which qualifies every sport as a performance. The inclusion of an athlete in the definition of performer is not out of the bounds of interpretation. Section 2(qq) of the Act establishes an inclusive class of performers by using the concept of *eiusdem generis* as a technique of construction. It is quite fair to interpret generic words that follow a list of specific people to encompass people of a

¹⁰ University of London Press Ltd v University Tutorial Press Ltd [1916] 2 Ch 601.

¹¹ Fiest Publications Incorporated v. Rural telephone Service Company 499 U.S. 340 (1991).

¹² Eastern Book Co. and Others v Modak and Another (2008) 1 SCC 1.

¹³ Courtney Walsh, In a sport where the forehand is king, Rafael Nadal does it best, *The Australian*, (May 29, 2021), <https://www.theaustralian.com.au/sport/tennis/in-a-sport-where-the-forehand-is-king-rafael-nadal-does-it-best/news-story/514c5d547ca2063a9fdd90e4845e8577>

¹⁴ India Copyright Act, 1957, Section 2(qq).

similar class. As a result, it is reasonable legally to infer that an athlete belongs to the same group or class as a performer.

INTERNATIONAL PERSPECTIVE- ARE SPORTING PERFORMANCES WITHIN THE AMBIT OF COPYRIGHT?

The predicament of whether athletes can claim copyright in the sporting events in which they compete is an intriguing one, with important ramifications not just for the players and their teams, but also for the organizations that often hold exclusive claim to the rights to commercialize the events. The heart of this issue pertains to whether the athletes are performing or creating a qualifying 'work' in the context of their sporting event, as defined by copyright law. If that is the case, they would be entitled to exclusive rights to regulate the distribution of their 'work'.

Different laws and conventions have defined 'work' in copyright law. The term "artistic work" is defined under the Berne Convention for the Protection of Literary as any production or output in the artistic sphere, regardless of its method or form of expression.¹⁵ The term "literary and artistic works" is used to refer to any unique work of authorship, regardless of literary or aesthetic qualities. The work's ideas do not have to be original, but the author must create the manner of expression themselves.¹⁶ Whether sporting performances can be considered as work through some cases below.

In the joint cases of Football Association Premier League Ltd v QC Leisure¹⁷ and Murphy v Media Protection Services¹⁸, the Premier League's governing body, FAPL (Football Association Premier League), promoted and distributed television rights to broadcast for the league games on the basis of geographic exclusivity. Instead of paying FAPL for broadcasting rights, certain companies in the United Kingdom resorted to using foreign decoding cards given by a Greek broadcaster to subscribers residing in Greece to access Premier League games. Such operations, according to the FAPL, devalued and endangered the value and exclusivity of their television broadcasting rights. The European Court of Justice held that since Premier League matches are not classified as works, FAPL could therefore not claim copyright on them. To be considered work, the subject matter must be unique in the sense that it is the

¹⁵ WIPO Lex, Article 2(1), Berne Convention for the Protection of Literary and Artistic Works, <https://wipolex.wipo.int/en/text/283698>

¹⁶ WIPO, Understanding Copyright and Related Rights, World Intellectual Property Organization, (2016), https://www.wipo.int/edocs/pubdocs/en/wipo_pub_909_2016.pdf

¹⁷ Football Association Premier League Ltd and Others v QC Leisure and Others [2008] EWHC 1411 (Ch).

¹⁸ Karen Murphy v Media Protection Services Ltd [2007] EWHC 3091 (Admin).

author's intellectual invention or creation. It further stated that football matches are restricted to game rules and regulations allowing no space for creative licence for purposes of copyright. As a result, those events are not safeguarded by copyright.

The United States Court of Appeals for the Second Circuit asserted that the fundamental basketball games do not fall within the subject material of federal copyright protection since they do not comprise "original works of authorship" as per 17 U.S.C. Section 102¹⁹ in the case of *NBA v. Motorola*²⁰ where the NBA claimed Motorola had infringed on the league's copyright on the game's broadcasting. The definition protects eight kinds of "works of authorship," including 'literary works', 'musical works' and 'dramatic works', according to Section 102(a). It also stated that any 'authorship' in a sporting event must be accessible to copying by competitors if spectators are to be drawn in.

To offer legal clarity on the issue, the rules and national legislations, in my opinion, should be simpler and clearer. Drawing a boundary between what is and is not a work of authorship is now a difficult process. It's worth noting that if football or hockey games were regarded 'works' of authorship and thus subject to copyright, then every athlete and team would be able to utilize the rights arising from their sporting accomplishments and performances. However, because the teams as well as athletes are playing in their leagues under their laws, the rights to commercialize the games are now owned by the league owners, promoters, or administrators, and it is the league owners that legally transmit these rights to other companies.

CONCLUSION

In the present era copyright in live sporting events is of critical importance and it is imperative that the problem be fully addressed. Live sports events have such a high economic value that they cannot be ignored or dealt with in a way that will lead to the extinction of the entire genre of events, because no one wants to invest in a sporting event if he is unsure of how much ownership he will be able to protect in the event of a copyright infringement. Until now, Indian courts have recognized copyright on live sporting events, although this is in stark contrast to the law in the United States on the same issue. It is necessary to examine the definition of cinematography films established by the Copyright Act, 1957, because there is no other provision in the Act that provides protection to live sporting events. If we differentiate according to the NBA case theory, we may grant copyright in sports events in a fixed form

¹⁹ Subject matter of copyright: In general, Title 17, U.S. Code, Section 102.

²⁰ *National Basketball Association v. Motorola* 105 F.3d 841 (2d Cir. 1997).

when they are recorded in any manner. As a consequence, it is imperative that the legislation in this area be explicit and consistent with international law.

When a fan consumes and distributes footage, their hunger for the live product grows.²¹ As a result, a hard-line attitude by copyright holders like cricket boards, combined with an inadequate fair use environment, goes against not just the ideals of copyright law, but also the interests of those attempting to protect their rights. Instead, collaborating with these curators and allowing them to market these clips and engage into revenue sharing arrangements for such monetisation, like the NBA does²², could be a better strategy.

With respect to signature sports moves, minor changes to the Act, the Copyright Act of 1957 can accommodate this new paradigm of sports commercialization. What separates an amateur from a high-performance athlete is the right integration and combination of manoeuvres and moves. Furthermore, the performer's right can protect the athlete from being exploited by coaches and other organizations. Although it is generally assumed that the practical execution of this provision will impair the overall character of the game, there are solutions to avoid chaos while simultaneously providing the required protection. One option would be to require all sporting committees to acquire licenses for all protected sporting moves. This will guarantee a continuous match while also safeguarding the creator's interests. India should take a more comprehensive and progressive approach to copyright law and recognize the economic rewards that such benefits may bring to an athlete. Copyright protection for sport moves and performances will serve as a stimulus for the growth of both the sports sector as well as IPR legislation.

²¹ Sidharth Monga, Why cricket boards should be more liberal with archival footage, ESPN CricInfo, (June 19, 2020), <https://www.espncriinfo.com/story/why-cricket-boards-should-be-more-liberal-with-archival-footage-1225288>

²² Adam Kilgore, How the NBA's embrace of social media might help it someday surpass the NFL, Washington Post, (June 8, 2017), <https://www.washingtonpost.com/news/sports/wp/2017/06/08/how-the-nbas-embrace-of-social-media-might-help-it-someday-surpass-the-nfl/>