

January 18, 2015

Ms. E. Elaine Gardner, Attorney
Attention: Disability Rights Office
Consumer and Governmental Affairs Bureau
Federal Communications Commission

RE: Case Identifier: CGB-CC-0235
CG Docket No. 06-181
Petition for Closed Captioning Exemption
Request for Supplemental Information (dated December 19, 2014)

Dear Ms. Gardner,

In answer to your letter requesting supplemental information, CHRISTIAN VIDEO MINISTRIES offers the following concerning your three highlighted requests:

1. 'Caption Labs not dated': Please see NEW Caption Lab's quote attached. They agreed to the same quote exactly and dated it as of today through April 30, 2015.
2. 'Dubbing Expense—need further explanation or correction': CHRISTIAN VIDEO MINISTRIES stands corrected and apologizes for its 'typo'. Your figures are correct ($\$137.75$), $(5 \times 25 = \$125.00$ each to copy $+ 5 \times 2.55$ postage $= 12.75 \times \$175 = \$24,106.25$.
3. 'Postage, Please explain': The quote we furnished was an approximate figure. The best possible exact figure would be as follows: Caption Labs' quote of $\$17$ per package from CVM to Caption Labs and an additional $\$17$ per package $+ \$4$ for packaging fee then return for a total of $\$38$ (package $\$17 + \$17 + \$4 \times 175 = \$6,650$)---best possible quote!

An additional statement to our exemption request: CHRISTIAN VIDEO MINISTRIES is by no means against 'closed captioning'; however, it's the expense that is the 'over burden'.

CVM has and continues to seek support and 'sponsorship'. Please grant our exemption knowing that if and when sponsorship becomes available, CVM will go forward with the closed captioning.

Thanks so much for your consideration,

Mrs. Jerry Dunson, Sec.
CHRISTIAN VIDEO MINISTRIES, INC.

Attachments: Affidavit, dated price quote from Caption Labs, explanation of 'dubbing' and 'postage' expenses

AFFIDAVIT

STATE OF TEXAS

COUNTY OF PARKER

BEFORE ME, the undersigned authority, on this day personally appeared MRS. JERRY DUNSON (also known as JANORA DUNSON) duly authorized Secretary of CHRISTIAN VIDEO MINISTRIES, INC., known to me to be the person who subscribed her name below and who having first duly sworn by me, on oath deposes and says:

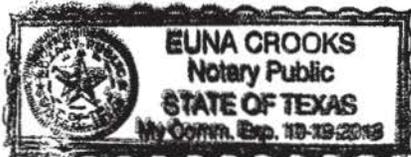
"After receiving a letter from E. Elaine Gardner, attorney for the Federal Communications Commission, I am responding with further and more detailed documentation that the process of 'closed captioning' would put an 'extreme economic burden' on this small, non-profit organization now and in the future.

I declare under penalty of perjury that the information contained in this entire submission and its supplements is true and correct.

CHRISTIAN VIDEO MINISTRIES, INC. AFFIDAVIT

By *Janora Dunson*
JANORA DUNSON, Secretary

SUBSCRIBED AND SWORN TO me by said JANORA DUNSON, Secretary of CHRISTIAN VIDEO MINISTRIES, INC., a Texas non-profit corporation, on behalf of said non-profit corporation, this 19 day of Jan, 2015, to certify which witness my hand and seal of office.



Euna Crooks

Notary Public in and for Parker County, Texas

affirmed 10-19-18

Christian Video Ministries

Closed Captioning & Digital Delivery Proposal

Pricing Valid For Acceptance Through April 30, 2015

Closed Captioning

Standard Roll-Up – 58:30 Program

\$275/ep

CaptionLabs will transcribe, format and synchronize the Closed Captions to the audio/video track. Roll-UP Captions will be moved to avoid on-screen graphics and chevrons (>>) will be used to identify different speakers. Quality checks are performed by both the transcriber and caption editor, resulting in accuracy of 99.5% or better. Price reflects NRB Special Pricing.

Tape Delivery

Pricing

BetacamSP - 60 Minutes
DVCPPro - 60 Minutes

\$45/tape
\$45/ tape

Shipping

CaptionLabs will ship on Client's FedEx/UPS account for a small packaging fee of \$4 per package.

Pricing for shipping on CaptionLab's account is as follows:

*Overnight by 10:30 AM
Overnight by 3:00 PM
Second Day
Ground*

*\$58/package
\$52/package
\$39/package
\$17/package*



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CaptionLabs, LLC
Columbus, Ohio
614-310-1300
www.CaptionLabs.com

Tapeless Workflow

Tapeless

Many stations now accept programs using digital files. CaptionLabs will receive programs via Internet Upload or digitize from video tape (Betacam SP or DVCPRO). Each station will receive a unique file based on their individual file specifications.

Drag & Drop Upload

With StationDrop, master files are delivered over the Internet using accelerated UDP technology. The transfer of files is as simple as Drag & Drop. Simply export the final program and drag the file to the StationDrop icon. Transfer of your file begins immediately.

Digital Delivery

Pricing

StationDrop 60 Minutes – SD	\$45/delivery
StationDrop 60 Minutes – HD	\$68/delivery
Tape Ingest (digital file master from tape)	\$40/tape
Station Setup	Fee Waived

Networks

Networks currently accepting StationDrop digital delivery include:

- TBN
- Golden Eagle Broadcasting
- The Word Network
- Daystar
- Church Channel
- TLN
- NRB Network
- Cornerstone
- Plus Many More...

Benefits

Both programmers and stations receive benefit from using Digital Delivery

For The Programmer:

- Faster delivery
- No VTRs or tape stock to purchase
- All Digital – Better Quality!

For The Station:

- Saves Labor – No tapes to ingest
- Reduces dependence on tape & VTRs
- All Digital – Better Quality!



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