



Federal Communications Commission
Washington, D.C. 20554

July 14, 2015

Frieda Bishop, Vice President and Secretary
Singing Crusade for Christ, Inc.
P.O. Box G
East Flat Rock, NC 28726

Re: Case Identifier: CGB-CC-1364
CG Docket No. 06-181
Petition for Closed Captioning Exemption
Request for Supplemental Information

Dear Ms. Bishop,

This letter concerns your Petition for exemption from the Federal Communications Commission's (FCC's) closed captioning requirements. After reviewing your Petition, the Consumer and Governmental Affairs Bureau (Bureau) has determined that additional information, as set forth below, is required to enable us to determine whether the programming that is the subject of your Petition should be exempted from the FCC's closed captioning requirements because captioning such programming would be economically burdensome to your organization.

Specifically, your Petition included information about the name of the specific program, the impact of captioning on your operation, financial resources, verification that captioning assistance was sought from the video programming distributor and additional sources of revenue, and a description of your overall operations. We conclude, however, that because your Petition is missing required information, we cannot take further action on it.

If you wish for your Petition to receive further consideration for a closed captioning exemption, you must supplement your Petition by providing us with the information described below **by August 13, 2015**, which is 30 days from the date of this letter:

- The nature and cost of the closed captions for the programming. Provide information about your organization's costs associated with closed captioning each specific program for which you are requesting an exemption, and your efforts to find companies that can provide captioning at a reasonable cost.
 - Include documentation for two or more recent quotes you received from closed captioning services to provide closed captioning specifically for your program(s).

You provided two captioning services quotes from Vanan Group and Caption Technologies, Inc. The Vanan Group quote is satisfactory, as the Vanan Group quote clearly indicates that the cost of captioning is: \$189.00 per episode. However, the quote from Caption Technologies remains unclear. The e-mail from Caption Technologies had some questions for you about the format and encoding before a final quote could be provided for either \$250 or \$350 per episode. You will need to provide us with a specific quote from Caption Technologies (or another vendor if you prefer).

- For each of the two captioning quotes you received from closed captioning services to provide closed captioning specifically for your program, include an estimate of your annual cost to caption your program(s). For example, multiply the cost to caption each of your program episodes by the number of program episodes you expect to produce and show in one year.

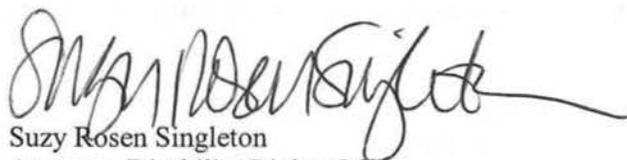
No estimates were submitted of the annual cost to caption your program for either of the two captioning quotes. You will need to provide us with this information by multiplying the number of episodes you air per year with the cost per episode. For example, for the quote from Vanan Group, you can multiply \$189 x 52 shows = \$9,828 annual cost. Your petition does not clarify how many episodes you need to caption on an annual basis so we are unable to determine the annual cost.

- **Affidavit or declaration. Your submission must contain a detailed, full showing, supported by a signed and sworn affidavit or signed declaration made under penalty of perjury attesting to the truthfulness and accuracy of the information and representations contained in your submission.** An affidavit is a written statement made under oath, before an official who is authorized to administer oaths, such as a notary public or county clerk. A declaration is a written statement made under penalty of perjury, such as "I declare under penalty of perjury that the information contained in this submission is true and correct." (See 47 C.F.R. § 1.16.) The affidavit or declaration must be dated.

If the Bureau determines that your Petition, as supplemented by your response to this letter, provides sufficient information upon which to make a determination of whether or not to grant a closed captioning exemption, we will place your Petition on public notice under Docket No. 06-181 at <http://fjallfoss.fcc.gov/ecfs>. Members of the public will then have 30 days to file comments on and/or oppositions to your Petition, including the supplemental information you have provided in response to this letter, after which you will have 20 days to respond. At the end of this timeframe, the Bureau will review your Petition, along with any comments and responses received, to determine whether you have demonstrated that providing closed captions would be economically burdensome. If Bureau denies your Petition, you will have 90 days from the date of your notification of the denial to begin captioning.

If you do not supplement your Petition with all of the updated information and documentation requested in this letter within 30 days of the date of this letter, we will conclude that you have failed to support your exemption request with adequate explanation and evidence, and will dismiss your Petition. In the event of such dismissal, your organization will be required to begin providing closed captioning for your program(s) within 90 days of the date of our notification to you that your Petition has been dismissed.

If you have questions pertaining to this letter or the information and materials requested herein, please contact the FCC's Disability Rights Office at captioningexemption@fcc.gov.


Suzy Rosen Singleton
Attorney, Disability Rights Office
Consumer and Governmental Affairs Bureau

Instructions for Filing a Supplement to a Closed Captioning Exemption Petition

Your supplemental information must be submitted to the FCC by e-mail to captioningexemption@fcc.gov. Petitions and supplemental materials may not be filed directly on the FCC's Electronic Comment Filing System (ECFS) or by U.S. mail. At this time, the FCC's e-mail system does not accept attachments in the form of .ZIP files or file sizes larger than 13.3 megabytes. If a petitioner has concerns that its file size will exceed this limitation, please contact captioningexemption@fcc.gov. Because the FCC will upload petitions and any supporting information and documentation to ECFS, petitioners must follow the ECFS document format guidelines (<http://apps.fcc.gov/ecfs/userManual/upload/documents.jsp>) when sending petitions, supporting information, and documentation via e-mail. For more information about this electronic filing procedure, visit <http://www.fcc.gov/encyclopedia/economically-burdensome-exemption-closed-captioning-requirements>.

You must include your case identifier number, which is located at the top of this letter, and CG Docket Number 06-181 in all correspondence with the FCC regarding your petition.

