

Dove Broadcasting, Inc., a 501c3 organization based in Taylors, South Carolina, wishes to petition for exemption from the Federal Communications Commission Television Closed Captioning Requirements for the following programs on the basis that providing Closed Captioning would be economically burdensome for Dove Broadcasting, Inc.:

*Nite Line* – a live, 2 hour program transmitted locally in the Greenville, Spartanburg, Asheville, Anderson DMA, and distributed to various television stations for non-synchronous airing at the discretion of the station to which *Nite Line* is distributed. The principal outlet for *Nite Line* is WGGS TV, of Greenville, South Carolina, upon which the program airs daily from 8PM until 10PM, with an additional airing 12 hours later from 8AM to 10AM. Secondary outlets include WATC TV in Atlanta, GA, WBPI in Augusta, GA.

and

*Beverly Exercise* – a 30 minute program focusing on exercise, motivation, and healthy living habits for senior adults, broadcast on WGGS, WRXY, WHBR, WLLA, WYKE, WGGN, KSCE, WFRZ, and WTLW.

Dove Broadcasting is an organization that supports ministry projects both in the United States and internationally through television programs. *Nite Line* offers exposure to national and local Christian ministries, many of which support food banks, drug rehabilitation programs, counseling, spiritual wellness, children's rights initiatives, educational initiatives, and many more worthwhile social programs. Without *Nite Line*, many of these ministries would not have the ability to promote their missions on television, depriving them of support, and by extension, depriving those members of the community that can benefit from the support of those organizations from potentially life-changing experiences. Dove Broadcasting and its viewers organize and conduct a winter mission project in impoverished regions of the Appalachian mountains in the United States, carrying toys, clothes, blankets, food, and other items to communities that are in need of assistance. These efforts are all supported by viewers of the *Nite Line* program.

Similarly, *Beverly Exercise* is a production of Dove Broadcasting that focuses on helping senior adults live healthy lives through exercise and personal motivation. The low-impact exercises promoted and explained on the program are essential parts of many viewers' daily routines, especially those who cannot afford or do not have access to organized fitness centers or instruction. Dove Broadcasting receives no monetary consideration for this program, as it is part of the Dove Broadcasting community service mission.

Dove Broadcasting, Inc. obtained the following quotes for the cost of captioning these programs:

### **Nite Line (Television Program):**

The *Nite Line* television program is a live, 2 hour daily broadcast, in the format of an unscripted Christian talk and variety show, featuring local and national ministries, churches, and live music. We estimate that as a daily program, *Nite Line* produces approximately 524 hours per year of programming.

Dove Broadcasting has obtained the following quotes from captioning services for the inclusion of captions in Nite Line.

Provider	Price/hour	additional fees	Hours per year	Closed Captioning Encoder- EVERTZ / HD-9084	Total Cost
Aberdeen	100	200	524	7792	60392
VITAC	120	0	524	7792	70672
Captionmax	110	0	524	7792	65432
NCI Captioning	125	0	524	7792	73292

Dove Broadcasting would need to provide a Closed Captioning Encoder for any of these solutions. The price of an Evertz HD9084 Encoder is an industry standard and is available for \$7792.

An additional cost that arises when producing specialty programming is vocabulary. Discussions on Nite Line are unscripted, and frequently center around discussions of Biblical scripture and history. Because the program features multiple hosts and guests, often with panel discussions of up to 8 people at a time, as well as live music, voice recognition software is not a feasible option. As the show is not currently scripted, Dove Broadcasting is unable at this time to send a script, vocabulary list, index of topics, or other supplementary material that would be essential to obtaining a high standard of accuracy for captioning. Therefore, it may be necessary to hire additional personnel specifically to produce supplementary materials for each program. This would entail fundamentally changing the nature of the program as well, as Nite Line is customarily a program with a relatively open format. We estimate that an additional part-time employee would be required to comply with accuracy standards.

The salary of an additional employee tasked with organizing programs to conform to a more strictly scripted format such that proper vocabulary and terminology lists could be generated for each program would, in our estimation, be approximately \$15/hour. We estimate that these duties would occupy approximately one hour of preparation time per one hour of live programming, thus adding at the least an additional \$7860/year.

Based on the quotes received for live captioning of Nite Line, Dove Broadcasting would be required to outlay somewhere between \$68,252 and \$81,152 per year for live captioning of Nite Line, using the lowest and highest estimates from captioning providers to establish a range, and including the cost of an additional part-time employee to provide captioning supervision.

## Beverly Exercise (Television Program):

Beverly Exercise is an exercise and fitness program targeted at senior adults, including instruction in healthy exercise and nutrition, as well as inspiration for the day.

We estimate that Beverly Exercise produces approximately thirty 30-minute programs per year. In addition to these programs, we maintain a library of previously recorded programs for re-air. Stations to which Dove Broadcasting provides Beverly Exercise maintain their own libraries of the program, and air these programs on schedules determined by the local station. If required to provide captions for these libraries, additional expenses would be incurred. We estimate that approximately 70 additional programs would need to be captioned in order to meet these requirements.

BEVERLY EXERCISE	PRICE PER PROGRAM	PROGRAMS/ YEAR	TOTAL COST/YEAR FOR NEW PRODUCTION
CAPTIONS FOR NEW PROGRAMMING			
Aberdeen - roll up	195	30	5880
VITAC - roll up	147.5	30	4455
VITAC - pop center	197.5	30	5955
CAPTIONLABS - roll up	180	30	5430
CAPTIONLABS - popup	250	30	7530
CAPTIONMAX	200	30	6030
NCI - roll up	175	30	5280
NCI - pop up	250	30	7530

CAPTIONS FOR EXISTING PROGRAM LIBRARY	PRICE PER PROGRAM	# EXISTING PROGRAMS REQUIRING CAPTIONING	TOTAL COST TO CAPTION EXISTING LIBRARY	TOTAL COST, FIRST YEAR OF CAPTIONING
Aberdeen - roll up	195	70	13650	19500
VITAC - roll up	147.5	70	10325	14750
VITAC - pop center	197.5	70	13825	19750
CAPTIONLABS - roll up	180	70	12600	18000
CAPTIONLABS - popup	250	70	17500	25000
CAPTIONMAX	200	70	14000	20000
NCI - roll up	175	70	12250	17500
NCI - pop up	250	70	17500	25000

# Appeal for Exemption

Dove Broadcasting is a donor-supported, 501c3 nonprofit organization. In the year 2014, Dove Broadcasting had a gross income of \$437,725, with a total outlay of \$451,839, with year-end net assets of \$65,534. Similarly, in 2013, Dove Broadcasting reported an income of \$435,287, with expenses and outlay of \$437,860. Using the lowest estimate available (\$68,252), Dove Broadcasting would be unable to provide for the costs of captioning Nite Line, as this figure surpasses the year-end assets of the organization.

The captioning of the Beverly Exercise library and new production programming would cost between \$14,750 and \$25,000 by the estimates we have obtained. By the lowest estimate, the first-year costs of captioning both Nite Line and Beverly Exercise would be \$83,000, far exceeding the yearly capital possessions of Dove Broadcasting, Inc.

If required to caption the Nite Line and Beverly Exercise programs, Dove Broadcasting would be forced to eliminate or modify its operations to limit expenses to free up capital for captioning purposes. This would have to take the form of the elimination of an employee or the limitation of funds used for aid projects, as Dove Broadcasting's fundraising activities currently go almost exclusively to the production of the Nite Line program and mission projects to help impoverished children and families in the Appalachian mountain regions of the United States. Income is variable throughout the year, and dependent on donations from viewers. As such, there are seasonal variations which are impossible to predict, and if Dove Broadcasting were forced to caption Nite Line and Beverly Exercise, may have the effect of forcing Dove Broadcasting to operate at a loss if donations are not constant, which they often are not. In 2013, for example, Dove Broadcasting was forced to reduce the working hours of its employees temporarily for lack of donations to cover expenses. If required to fund closed captioning for Nite Line and Beverly Exercise, Dove Broadcasting may be forced to halt the distribution of these programs.

Dove Broadcasting has reached out to Carolina Christian Broadcasting of Greenville, SC, as well as Community Television of Atlanta, GA, the two primary broadcasters of Nite Line for financial assistance with captioning Nite Line and Beverly Exercise, and have not been able to secure funding from either of those entities for assistance.

Dove Broadcasting has also attempted to contact the AARP, AMAC, and the NAOCS, which are organizations representing senior adults in the US, the target audience for Beverly Exercise, and has yet to receive a reply from any of these organizations with an offer to assist financially in captioning Beverly Exercise.

For these reasons, Dove Broadcasting is applying for exemption from FCC Closed Captioning requirements on the grounds of Undue Financial Burden.

Supplementary Material:

1. Dove Broadcasting Financial Statements, 2014 and 2013
2. Closed Captioning Quotes
3. Letters Sent to Obtain Financial Assistance for Closed Captioning

1. Dove Broadcasting Financial Statements, 2014 and 2013

**DOVE BROADCASTING, INC.**  
**Financial Statements**  
**For the Year Ended December 31, 2014**

**Edwards & Hedrick, P.A.**  
*Certified Public Accountants*  
1109 West Poinsett Street, Suite C  
Greer, South Carolina 29650

**INDEPENDENT ACCOUNTANTS' COMPILATION REPORT**

To the Board of Directors  
Dove Broadcasting, Inc.  
Greenville, South Carolina

We have compiled the accompanying statement of financial position of Dove Broadcasting, Inc. (a nonprofit corporation) as of December 31, 2014, and the related statement of activities for the year then ended. We have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with accounting principles generally accepted in the United States of America.

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

Management has elected to omit substantially all of the disclosures and the statement of cash flows required by accounting principles generally accepted in the United States of America. If the omitted disclosures and statement of cash flows were included in the financial statements, they might influence the user's conclusions about the Corporation's financial position, changes in net assets, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

May 12, 2015

*Edwards & Hedrick, CPAs, P.A.*  
EDWARDS & HEDRICK, CPAs, P.A.

**DOVE BROADCASTING, INC.**  
**Statement of Financial Position**  
**December 31, 2014**

**ASSETS**

**CURRENT ASSETS**

Cash \$ 34,420

TOTAL CURRENT ASSETS \$ 34,420

**PROPERTY AND EQUIPMENT**

Trailer 6,050  
Furniture and fixtures 36,025  
Transmitters and receivers 71,723  
Studio equipment 114,903  
Leasehold improvements 34,664

TOTAL PROPERTY AND EQUIPMENT 263,365

Accumulated depreciation (229,068)

NET PROPERTY AND EQUIPMENT 34,297

\$ 68,717

**LIABILITIES AND NET ASSETS**

**CURRENT LIABILITIES**

Accounts payable \$ 3,183

TOTAL CURRENT LIABILITIES \$ 3,183

**NET ASSETS**

Unrestricted 65,534

TOTAL NET ASSETS 65,534

\$ 68,717

See accountants' compilation report.

**DOVE BROADCASTING, INC.**  
**Statement of Activities**  
**For the Year Ended December 31, 2014**

	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>Total</u>
<b>PUBLIC SUPPORT AND REVENUES</b>			
Contributions	\$ 369,103	\$ 68,622	\$ 437,725
Net assets released from restriction	<u>68,622</u>	<u>(68,622)</u>	<u>-</u>
<b>TOTAL PUBLIC SUPPORT AND REVENUES</b>	<u>437,725</u>	<u>-</u>	<u>437,725</u>
<b>EXPENSES</b>			
Program expenses			
Television air time	29,000	-	29,000
Viewer gifts	6,390	-	6,390
Guest expense	11,831	-	11,831
Other direct	<u>84,831</u>	<u>-</u>	<u>84,831</u>
		-	
Total program expenses	<u>132,052</u>	<u>-</u>	<u>132,052</u>
Supporting expenses			
Salaries	207,005	-	207,005
Casual and contract labor	3,134	-	3,134
Auto and truck expense	1,400	-	1,400
Bank service charge	3,030	-	3,030
Contributions	500	-	500
Depreciation	6,877	-	6,877
Equipment rental	1,948	-	1,948
Insurance	14,838	-	14,838
Legal and accounting	9,900	-	9,900
Miscellaneous expense	445	-	445
Office supplies	3,209	-	3,209
Outside services	11,879	-	11,879
Postage	11,396	-	11,396
Repairs and maintenance	1,871	-	1,871
Supplies	1,058	-	1,058

See accountants' compilation report.

**DOVE BROADCASTING, INC.**  
**Statement of Activities**  
**For the Year Ended December 31, 2014**

	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>Total</u>
Supporting expenses (continued)			
Taxes and licenses	\$ 18,063	\$ -	\$ 18,063
Telephone	21,533	-	21,533
Travel	1,701	-	1,701
	<u>319,787</u>	<u>-</u>	<u>319,787</u>
Total supporting expenses			
	<u>319,787</u>	<u>-</u>	<u>319,787</u>
TOTAL EXPENSES	<u>451,839</u>	<u>-</u>	<u>451,839</u>
CHANGES IN NET ASSETS	(14,114)	-	(14,114)
NET ASSETS, Beginning of Year	<u>79,648</u>	<u>-</u>	<u>79,648</u>
NET ASSETS, End of Year	<u>\$ 65,534</u>	<u>\$ -</u>	<u>\$ 65,534</u>

See accountants' compilation report.

**DOVE BROADCASTING, INC.**  
**Financial Statements**  
**For the Year Ended December 31, 2013**

**Edwards & Hedrick, P.A.**  
*Certified Public Accountants*  
1109 West Poinsett Street, Suite C  
Greer, South Carolina 29650

**INDEPENDENT ACCOUNTANTS' COMPILATION REPORT**

To the Board of Directors  
Dove Broadcasting, Inc.  
Greenville, South Carolina

We have compiled the accompanying statement of financial position of Dove Broadcasting, Inc. (a nonprofit corporation) as of December 31, 2013, and the related statement of activities for the year then ended. We have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with accounting principles generally accepted in the United States of America.

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

Management has elected to omit substantially all of the disclosures and the statement of cash flows required by accounting principles generally accepted in the United States of America. If the omitted disclosures and statement of cash flows were included in the financial statements, they might influence the user's conclusions about the Corporation's financial position, changes in net assets, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

May 6, 2014

*Edwards & Hedrick, CPAs, P.A.*

EDWARDS & HEDRICK, CPAs, P.A.

**DOVE BROADCASTING, INC.**  
**Statement of Financial Position**  
**December 31, 2013**

**ASSETS**

**CURRENT ASSETS**

Cash \$ 41,616

TOTAL CURRENT ASSETS \$ 41,616

**PROPERTY AND EQUIPMENT**

Trailer 6,050

Furniture and fixtures 35,420

Transmitters and receivers 71,723

Studio equipment 114,903

Leasehold improvements 34,664

TOTAL PROPERTY AND EQUIPMENT 262,760

Accumulated depreciation (222,191)

NET PROPERTY AND EQUIPMENT 40,569

\$ 82,185

**LIABILITIES AND NET ASSETS**

**CURRENT LIABILITIES**

Accounts payable \$ 2,537

TOTAL CURRENT LIABILITIES \$ 2,537

**NET ASSETS**

Unrestricted 79,648

TOTAL NET ASSETS 79,648

\$ 82,185

See accountants' compilation report.

**DOVE BROADCASTING, INC.**  
**Statement of Activities**  
**For the Year Ended December 31, 2013**

	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>Total</u>
<b>PUBLIC SUPPORT AND REVENUES</b>			
Contributions	\$ 381,838	\$ 53,449	\$ 435,287
Net assets released from restriction	<u>53,449</u>	<u>(53,449)</u>	<u>-</u>
<b>TOTAL PUBLIC SUPPORT AND REVENUES</b>	<u>435,287</u>	<u>-</u>	<u>435,287</u>
<b>EXPENSES</b>			
Program expenses			
Television air time	24,000	-	24,000
Viewer gifts	8,519	-	8,519
Guest expense	46,356	-	46,356
Other direct	<u>58,080</u>	<u>-</u>	<u>58,080</u>
		-	
Total program expenses	<u>136,955</u>	<u>-</u>	<u>136,955</u>
Supporting expenses			
Salaries	175,329	-	175,329
Casual and contract labor	4,688	-	4,688
Auto and truck expense	2,034	-	2,034
Bank service charge	3,485	-	3,485
Contributions	500	-	500
Depreciation	7,644	-	7,644
Equipment rental	1,987	-	1,987
Insurance	13,208	-	13,208
Legal and accounting	10,005	-	10,005
Miscellaneous expense	1,509	-	1,509
Office supplies	2,559	-	2,559
Outside services	6,877	-	6,877
Postage	15,505	-	15,505
Rent	4,874	-	4,874
Repairs and maintenance	3,697	-	3,697
Supplies	8,303	-	8,303

See accountants' compilation report.

**DOVE BROADCASTING, INC.**  
**Statement of Activities**  
**For the Year Ended December 31, 2013**

	Temporarily		Total
	Unrestricted	Restricted	
Supporting expenses (continued)			
Taxes and licenses	\$ 14,875	\$ -	\$ 14,875
Telephone	21,780	-	21,780
Travel	2,046	-	2,046
	<u>300,905</u>	<u>-</u>	<u>300,905</u>
Total supporting expenses			
	<u>437,860</u>	<u>-</u>	<u>437,860</u>
TOTAL EXPENSES			
	(2,573)	-	(2,573)
CHANGES IN NET ASSETS			
NET ASSETS, Beginning of Year	<u>82,221</u>	<u>-</u>	<u>82,221</u>
NET ASSETS, End of Year	<u>\$ 79,648</u>	<u>\$ -</u>	<u>\$ 79,648</u>

See accountants' compilation report.

## 2. Closed Captioning Quotes

### Aberdeen Broadcast Services

22362 Gilberto, Suite 120  
Rancho Santa Margarita, CA 92688  
abercap.com 800-688-6621

## Price Quote

**Account** WGG5 TV  
P.O. Box 1616  
Greenville SC 29602

**Quote ID** 04313  
**Status** Open  
**Quote Good until:** 05/31/2015

### Quote Detail

**Project Name:** Aberdeen Captioning & Delivery - Beverly Exercise

**Specifications:** WORKFLOW & SERVICE OVERVIEW

Aberdeen Broadcast Services to provide WGG5 with captioning and digital file delivery services to WGG5 for 30 minute programming of Beverly Exercise. Client master files to be uploaded via AberFast electronic file transfer system in Apple ProRes 422 (LT) file format or comparable specifications per Aberdeen guidelines. Files to adhere to Aberdeen file specifications ([http://abercap.com/static/pdf/Aberdeen\\_DFD\\_Broadcast\\_Standards.pdf](http://abercap.com/static/pdf/Aberdeen_DFD_Broadcast_Standards.pdf)) and in conjunction with station requirements (leader elements, aspect ratio, center cut considerations, etc.)

**ADDITIONAL FEE(S) NOTE (VIDEO/AUDIO/CAPTIONING)**

A full or partial charge may apply on top of charges detailed in the line items below should Aberdeen be required to re-transcode any files due to issues stemming from provision of non-airable or unacceptable master video or caption files provided by client. Non-airable or unacceptable files may include, but are not limited to: master video and/or audio that do not meet TV broadcast standards (document provided in separate attachment). Editing, quality assurance and alteration or restoration charges may also apply if required.

**TIMELINE REQUIREMENTS:** 5 business days required to turn program around. A program received on a weekday by 3:00pm will be scheduled the following business day. Files received after 3:00pm may not be scheduled until 2 business days later. The business day a file is received (if in-house at Aberdeen before 3:00pm) is considered "Day 0." Work as detailed in this quote and a final deliverable as specified in line items below will be supplied to a station(s) and/or client as detailed in "Quote Specifications" above by EOD on the 5th business day.

**Comments:**

**Effective Date:** 05/01/2015

**Acct. Exec.:** TONY

**Ship Via:** AberFast DFD

#### Payment Policy

**One-time projects:** Prepayment Required

**Daily/Weekly/Continuous work contracts:** Prepayment required for two complete invoicing periods, after which clients who meet a certain criteria may be switched to monthly invoice/billing (NET15) on the first business day of the following month

**Accepted forms of payment:** Check thru ACH (physical check or ask for Aberdeen electronic form), Credit Card, Cash or Cashier's Check.

**TRT/Pricing Guidelines:** As per industry standards, TRT of each individual file will be rounded up to the next full minute for billing purposes. If TRT changes amount to more than a 10% increase in price over quote, Client will receive order confirmation with updated price total and Client approval is needed to move forward. If TRT changes result in less than a 10% increase in price over quote, project will automatically be moved into production and client will see final price on order confirmation.

Line Items				
Description	Qty	Unit	Unit Price	Line Total
<b>Roll-Up CC Broadcast Basic (30 min)</b> Closed Captions appear upper and lower case on the screen 2 or 3 lines at a time and roll-up one additional line at a time. This product meets the FCC broadcast quality requirements for accuracy few or no errors, synchronicity - timed to speakers, placement - avoid covering important on-screen items, and completeness - entire length of program.	1	EA	195.00	195.00
<b>AberFast File Delivery SD Source</b> Client to upload their master video file to Aberdeen via our AberFast HotFolder. Aberdeen will QC, transcode video to individual TV station specifications (inserting closed captions if necessary) and deliver video file to specified station via the AberFast managed transfer system that will also provide email confirmation to you.	1	EA	0.00	0.00
<b>AberFast 30 min Delivery SD - WGGS</b>	1	EA	45.00	45.00
<b>FILE Export SCC files</b>	1	EA	0.00	0.00
<b>Transcript in Text or Word Doc</b>	1	EA	0.00	0.00
<b>Non-Cash Price (3%)</b> There is a 3 % non_cash fee for credit card transactions. Only major (AMEX, VISA, or MasterCard) credit cards accepted.	1	EA	7.20	7.20
<b>Quote Total:</b>				<b>247.20</b>

Contacts					
Last Name	First Name	Title	Business	Mobile	EMAIL_ADDR
Tolbert	Tob	Media Specialist	(864) 244-1616		tob@wggs16.com

**Payment Policy**

**One-time projects:** Prepayment Required  
**Daily/Weekly/Continuous work contracts:** : Prepayment required for two complete invoicing periods, after which clients who meet a certain criteria may be switched to monthly invoice/billing (NET15) on the first business day of the following month  
**Accepted forms of payment:** Check thru ACH (physical check or ask for Aberdeen electronic form), Credit Card, Cash or Cashier's Check.

**TRT/Pricing Guidelines:** As per industry standards, TRT of each individual file will be rounded up to the next full minute for billing purposes. If TRT changes amount to more than a 10% increase in price over quote, Client will receive order confirmation with updated price total and Client approval is needed to move forward. If TRT changes result in less than a 10% increase in price over quote, project will automatically be moved into production and client will see final price on order confirmation.



**Aberdeen Broadcast Services**

22362 Gilberto, Suite 120  
 Rancho Santa Margarita, CA 92688  
 abercap.com 800-688-6621

**Price Quote**

**Account** WGGG TV  
 P.O. Box 1616  
 Greenville SC 29602

**Quote ID** 04312  
**Status** Open  
**Quote Good until:** 05/31/2015

**Quote Detail**

**Project Name:** Live Captioning - Niteline (2 hours)  
**Specifications:** GENERAL WORKFLOW: Aberdeen Broadcast Services will provide live captioning services per line items below. Monday through Friday programming from 8pm to 10pm Eastern. Aberdeen requires 30-60 minutes of testing and coordination with WGGG on a date prior to event in order to set-up and test.

**Comments:**  
**Effective Date:** 05/01/2015  
**Acct. Exec.:** TONY  
**Ship Via:** AberFast DFD

**Line Items**

Description	Qty	Unit	Unit Price	Line Total
<b>Live Captioning Services (per program)</b> Aberdeen will provide live captioning service with a live steno writer at a 98% accuracy rate or better for dialogue spoken at 200 wpm or less. This excludes multiple speakers speaking over each other's dialogue.  Billing is a 2hr minimum. If client schedules for a period of time more 2 hours, then that will be the minimum billed time. Time beyond minimum due to additional programming or client technical issues will be billed in 15 min increments.  Client to provide 2 analog phones (one for the encoder and one for audio connection). Client will provide to Aberdeen a show rundown and/or a list of uncommon words and acronyms, glossary terms, names of presenters and topic of content via e-mail a day before captioning is scheduled. This information is required to guarantee 98% accuracy.  The following credit in closed captions will be placed at the beginning or end of each program "Captions by Aberdeen Captioning, www.abercap.com, 1-800-688-6621". This helps you since we field calls from viewers about captioning and can either answer a simple question or direct them to your company.	2	HR	100.00	200.00
<b>One-time Set Up Fee</b> Set-Up Fees	1	EA	200.00	200.00
<b>Non-Cash Price (3%)</b> There is a 3 % non_cash fee for credit card transactions. Only major (AMEX, VISA, or MasterCard) credit cards accepted.	1	EA	12.00	12.00

**Quote Total: 412.00**

**Payment Policy**

**One-time projects:** Prepayment Required  
**Daily/Weekly/Continuous work contracts:** : Prepayment required for two complete invoicing periods, after which clients who meet a certain criteria may be switched to monthly invoice/billing (NET15) on the first business day of the following month  
**Accepted forms of payment:** Check thru ACH (physical check or ask for Aberdeen electronic form), Credit Card, Cash or Cashier's Check.  
  
**TRT/Pricing Guidelines:** As per industry standards, TRT of each individual file will be rounded up to the next full minute for billing purposes. If TRT changes amount to more than a 10% increase in price over quote, Client will receive order confirmation with updated price total and Client approval is needed to move forward. If TRT changes result in less than a 10% increase in price over quote, project will automatically be moved into production and client will see final price on order confirmation.





Tob Tolbert &lt;tob.tolbert@gmail.com&gt;

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## Captioning Request

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**Anthony DeMarco** <ademarco@ncicap.org>  
To: Tob Tolbert <tob@wggs16.com>

Wed, Jun 17, 2015 at 9:36 AM

Hi Tob, below is the pricing for both shows:

1. A 2-hour live program each weekday, from 8-10 PM EST. Approximately 262 programs/year. Program is a Christian talk show format with up to 8 guests at a time, and includes live music. Unscripted. We would be able to send audio feed and provide our own CC encoder.

>> *Real-Time Live captioning connecting to your encoder = \$125.00 per program hour, prorated by the ¼ hour. Basically a 2-hour show would be \$250.00*

2. A 30 minute exercise program, single speaker, approximately 30 episodes/year. Supply would be 2-3 programs per month, with about a week of time available between taping and air to do captioning. Unscripted.

>> *If you choose Pop-On captioning, the pricing is \$250.00 per 30-min episode*

>> *If you choose Timed Roll-Up captioning, the pricing is \$175.00 per 30-min episode (These will be created as 2-lines at the top and cannot cover graphics)*

On a side note, I will be out of the office tomorrow and Friday but will return on Monday.

Thanks!

Anthony

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**From:** [tob.tolbert@gmail.com](mailto:tob.tolbert@gmail.com) [mailto:[tob.tolbert@gmail.com](mailto:tob.tolbert@gmail.com)] **On Behalf Of** Tob Tolbert  
**Sent:** Tuesday, June 16, 2015 6:01 PM  
**To:** Anthony DeMarco  
**Subject:** Re: Captioning Request

[Quoted text hidden]



8/26/2015

Gmail - RE: CaptionMax Rate Request



Tob Tolbert <tob.tolbert@gmail.com>

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**RE: CaptionMax Rate Request**

5 messages

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**Lindsay Beiriger** <LindsayBeiriger@captionmax.com>  
To: "tob@wggs16.com" <tob@wggs16.com>

Tue, Jun 16, 2015 at 4:33 PM

Hi Tob – Thanks so much for reaching out to us. We'd love to provide closed captioning services for these two series.

1. We can provide real-time captioning services each weekday from 8-10pm EST for \$110/hr, \$220/episode. What type of encoder do you have?

2. We can provide offline captioning services for your exercise show for \$200/episode. I've attached our specs and we'd set you up with a Media Shuttle account for video transfers. Do you need the caption file only, or are you interested in us embedding to digital file or tape as well?

Thanks,  
Lindsay

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**Lindsay Beiriger**  
Director Business Development  
**CaptionMax**  
direct: [612.656.1042](tel:612.656.1042)  
mobile: [818.859.9525](tel:818.859.9525)

email: [Lindsay@captionmax.com](mailto:Lindsay@captionmax.com)

**Ask about our Multi-language subtitling and Spanish SAP capabilities!**

Please contact the following person with regards to their rate request:

First Name: tob

Last Name: tolbert

Company: Dove Broadcasting

Email: [tob@wggs16.com](mailto:tob@wggs16.com)

Phone: [8642441616](tel:8642441616)

<https://mail.google.com/mail/u/0/?ui=2&ik=95bdc85404&view=pt&q=captionmax&qs=true&search=query&th=14dfe143d9fceb7&siml=14dfe143d9fceb7&siml...> 1/4



8/26/2015

Gmail - VITAC\_Caption Quote



Tob Tolbert <tob.tolbert@gmail.com>

## VITAC\_Caption Quote

3 messages

Maggie McDermott <Maggie.McDermott@vitac.com>  
To: "tob@wggs16.com" <tob@wggs16.com>

Tue, Apr 28, 2015 at 3:24 PM

Hi Tob,

Thanks for your closed captioning inquiry.

To follow-up, here's a quote for your 2 projects, realtime and offline. For the offline caption work, I've provided pricing for two different styles of captioning Roll-Up and Pop-Center. I have attached a copy of the sample captions so you can see the difference. Most platforms like Amazon Prime and Netflix do not accept Roll Up style captions. So I have included a Pop-Center option as an alternative.

Service	Cost/Hour	Hours	# of Episodes	Total/Year
Realtime	\$120	2	262	\$62,880
Offline - Roll-Up	\$295	0.5	30	\$4,425
Offline - Pop-Center	\$395	0.5	30	\$5,925

**Realtime workflow:** Schedule kick off meeting with your team to review daily program, topics and escalation process. Coordinate live test loop to confirm connectivity and caption pass through. Schedule ongoing program and launch.

**Offline workflow:** Create low resolution video proxies with visible time code. (Specs attached) Post to our FTP. We will create caption files and return them to you via email.

I understand that you are out of the office right now. Please let me know when might be a good time to follow-up with you later this week.

Best,

Maggie

<https://mail.google.com/mail/u/0/?ui=2&ik=95bdc85404&view=pt&q=vitac&qs=true&search=query&th=14d017d10c23d6f0&siml=14d01b4042525368&siml=14e...> 1/3

8/26/2015

Gmail - An exciting opportunity awaits Community Television!



Tob Tolbert <tob.tolbert@gmail.com>

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## An exciting opportunity awaits Community Television!

2 messages

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**Tob Tolbert** <tob.tolbert@gmail.com>  
To: Greg West <greg@wadc.tv>

Tue, Jun 16, 2015 at 10:42 PM

Mr. West-

I am writing on behalf of Dove Broadcasting, Inc. of Greenville, South Carolina, producer and distributor of the television program "Nite Line." First of all, we wish to thank you for your continued and gracious support of our program and its mission of changing lives through encouraging testimonies, spiritual education, and inspirational music. Your generosity in allowing us complimentary airtime on WATC has been instrumental in "Nite Line" reaching a wider audience, and we look forward to continuing to partner with you in the future.

As you may know, the Federal Communications Commission has enacted new rules on Closed Captioning compliance. The financial resources of Dove Broadcasting will unfortunately be stretched by attempts to comply with these new regulations, as the costs of providing captioning for a live daily program of 2 hours per day (which works out to approximately 524 hour per year) adds up quickly. Thus, Dove Broadcasting is currently seeking sponsors to help underwrite the costs of captioning Nite Line each weeknight. Closed Captioning would be a valuable service that Dove Broadcasting wishes to adopt in order to better serve the community, and we would like to offer the ability to become a partner in offering that service to WATC TV and Community Television. Sponsorships would be available on a daily basis, with an underwriting tag indicating that Closed Captioning for each program is provided by Community Television.

Please let us know if you are interested in this opportunity to help us expand the reach of "Nite Line!"

Tob Tolbert  
Media Specialist  
Dove Broadcasting, Inc.  
[tob@wags16.com](mailto:tob@wags16.com)  
(864) 244-1616

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**Greg West** <greg@wadc.tv>  
To: Tob Tolbert <tob.tolbert@gmail.com>

Wed, Jun 17, 2015 at 8:36 AM

Tob,

Thank you for the opportunity to sponsor Nite Line to assist with the closed captioning costs for the program. Unfortunately we are in a situation where Community Television, Inc. has to also address the same closed captioning issues and would have to put all of our resources towards that.

Thank you,  
Greg West  
WATC/Community Television, Inc.

<https://mail.google.com/mail/u/0/?ui=2&ik=95bdc85404&view=pt&q=to%3Agreg%40wadc.tv&qs=true&search=query&th=14dff657f120f858&siml=14dff657f120f8...> 1/2

Mr. West

I am writing on behalf of Dove Broadcasting, Inc. of Greenville, South Carolina, producer and distributor of the television program "Beverly Exercise." First of all, we wish to thank you for your continued and gracious support of our program and its mission of changing lives through encouraging testimonies, spiritual education, and inspirational music. Your generosity in allowing us complimentary airtime on WATC has been instrumental in "Nite Line" reaching a wider audience, and we look forward to continuing to partner with you in the future.

As you may know, the Federal Communications Commission has enacted new rules on Closed Captioning compliance. The financial resources of Dove Broadcasting will unfortunately be stretched by attempts to comply with these new regulations, as the costs of providing captioning for a live daily program of 2 hours per day (which works out to approximately 524 hour per year) adds up quickly. Thus, Dove Broadcasting is currently seeking sponsors to help underwrite the costs of captioning Nite Line each weeknight. Closed Captioning would be a valuable service that Dove Broadcasting wishes to adopt in order to better serve the community, and we would like to offer the ability to become a partner in offering that service to WATC TV and Community Television. Sponsorships would be available on a daily basis, with an underwriting tag indicating that Closed Captioning for each program is provided by Community Television.

Please let us know if you are interested in this opportunity to help us expand the reach of "Nite Line!"

Tob Tolbert  
Media Specialist  
Dove Broadcasting, Inc.  
[tob@wggs16.com](mailto:tob@wggs16.com)  
(864) 244-1616

To the esteemed AARP representative-

I am writing on behalf of Dove Broadcasting, Inc. of Greenville, South Carolina, producer and distributor of the television program *Beverly Exercise*, a health and exercise program aimed at providing exercise instruction for our senior population. *Beverly Exercise* is a favorite on 9 television stations in the US, including the markets of

Greenville, SC, Central and Southwest Florida, Central Ohio, Kalamazoo, Michigan, El Paso, Texas, and Montgomery, Alabama. *Beverly Exercise* traditionally airs in the sunrise hours on a 5 day/week schedule, greeting seniors with a 30 minute workout, as well as inspirational thoughts, and an uplifting message: *It is never too late to get in shape!* The host, Beverly Chesser, has 40+ years of experience as a fitness instructor, and is well known and loved in many television markets, offering an invaluable service to seniors.

Beverly herself says:

I began my exercise program at the age of 27 -out of shape. At a friend's insistence, I attended her spa and took an exercise class. To be honest, it almost killed me. I'm so thankful to God that He enabled me to hang-in-there and make it through four weeks of exercise. What happened? Well, my life was transformed. I started to think more clearly, my mood changed-I became happy. I didn't suffer from poor self-esteem. I had so much more energy...and on and on I could go. In other words, when I started exercising, I continued long enough to get the addiction and feel all those wonderful feelings God put in our bodies that we experience when we start getting fit!!! What happened to my body? Well, within weeks my "thunder thighs", as I called them, started to come right down. Within a few weeks my thighs were in proportion to my shoulders. I no longer had to buy jackets long enough to cover my thighs! Also, I found myself wanting to eat healthy. Before long, I was reading labels and food cravings were a thing of the past.

Please don't settle for being overweight, out-of-shape or experiencing low self-esteem, let me help you be all that God wants you to be. As we exercise, I share nutrition information, encouragement and spiritual food for the day.

God bless you richly my friend,

Beverly Chesser

As you may know, the Federal Communications Commission has enacted new rules on Closed Captioning compliance. The financial resources of Dove Broadcasting will unfortunately be stretched by attempts to comply with these new regulations, as the costs of providing captioning for a program which may see 40 new episodes a year, with an extensive library of older programs that would also require captioning to be continually viable. Thus, Dove Broadcasting is currently seeking sponsors to help underwrite the costs of captioning *Beverly Exercise*. Closed Captioning would be a valuable service that Dove Broadcasting wishes to adopt in order to better serve the community, and we would like to offer the ability to become a partner in offering that service to the AARP. Sponsorships would be available on a daily basis, with an underwriting tag indicating that Closed Captioning for each program is provided by the AARP.

Please let us know if you are interested in this opportunity to help us expand the reach of *Beverly Exercise!* Thank you very much for your time, and I look forward to the opportunity of speaking with you further!

Tob Tolbert  
Media Specialist  
Dove Broadcasting, Inc.  
[tob@wggs16.com](mailto:tob@wggs16.com)  
(864) 244-1616

I am writing on behalf of Dove Broadcasting, Inc. of Greenville, South Carolina, the producer and distributor of the television program *Beverly Exercise*, a health and exercise program aimed at providing exercise instruction for our senior population. *Beverly Exercise* is a favorite on 9 television stations in the US, including the markets of Greenville, SC, Central and Southwest Florida, Central Ohio, Kalamazoo, Michigan, El Paso, Texas, and Montgomery, Alabama. *Beverly Exercise* traditionally airs in the sunrise hours on a 5 day/week schedule, greeting seniors with a 30 minute workout, as well as inspirational thoughts, and an uplifting message: *It is never too late to get in shape!* The host, Beverly Chesser, has 40+ years of experience as a fitness instructor, and is well known and loved in many television markets, offering an invaluable service to seniors.

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God bless you richly my friend,

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Please let us know if you are interested in this opportunity to help us expand the reach of *Beverly Exercise*! Thank you very much for your time, and I look forward to the opportunity of speaking with you further!

Tob Tolbert  
Media Specialist  
Dove Broadcasting, Inc.  
[tob@wggs16.com](mailto:tob@wggs16.com)  
(864) 244-1616

## DECLARATION

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

A handwritten signature in blue ink, appearing to read 'Dante Thompson', with a stylized flourish at the end.

Dante Thompson

Dove Broadcasting, Inc.  
3409 Rutherford Rd. Ext.  
Taylors, SC 29687