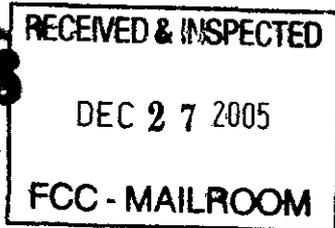


CCB-00-0044



P.O. Box 65036
Virginia Beach, VA 23467
Phone (757) 420-2625



Federal Communications Commission
Attention: Amelia Brown
445 12th Street S.W.
Washington, D.C. 20554

OVERNIGHT DELIVERY

RE: Petition for Exemption of Closed Captioning on Basis of Undue Burden standard contained in Section 79.1(f) of the rules.

Dear Ms. Brown:

Joy Ministries which helps hurting women in the inner city of Norfolk, Virginia currently airs a weekly 30-minute television program called "Joy in the Morning". The purpose of this petition is to request exemption of Closed Captioning for our program based on the undue burden standard contained in Section 79.1(f) of the Commission's rules.

1. The nature and cost of Closed Captioning our programs outside will run our ministry approximately \$300-\$360 per half hour program. This is based on two different quotes from closed captioning companies that were contacted, Texoma Captions in Dallas, Texas and CPC Computer Prompting & Captioning Co. in Rockville, MD. Both of these facilities were contacted by our distribution company, (see attached).
2. The total financial revenue to this ministry in 2004 was \$381,403 and the estimated cost for Closed Captioning will be \$22,360 per year to the ministry including tape stock and shipping and handling. Therefore the financial impact on this ministry will be significant potentially affecting several ministry programs we have in the works helping inner city women and their children.
3. Although this will pose a significant burden upon our financial resources as we go into 2006, we will begin a capital resource campaign in order to help us cover these costs as we do wish to comply with the closed captioning rules. We are researching various donor sources to help us with this and estimate it will take us at least six-eight months or more to raise the necessary funds needed to close caption our program.
4. Joy Ministries does not own or operate any its own video production or editing equipment or production facilities all work is done outside. As needed we rent a small facility to produce our program and those costs are covered from donations given to the ministry for that purpose. This production facility we use does not have Closed Captioning capabilities.

I do hereby agree that the above information and the attached information are correct and true. Thank you for your consideration for this exemption for our program.

Respectfully,

Danette Crawford
President
Joy Ministries

NEWTON MEDIA

Newton Media Associates, Inc.
A media management company
829 Greenbrier Parkway, Suite 200
Chesapeake, Virginia 23320
757-547-5400 Fax 757-547-7383
e-mail: info@newtonmedia.com
www.newtonmedia.com



December 21, 2005

Rev. Danette Crawford, President
Joy Ministries
1446 Kempsville Rd
Suite 203
Virginia Beach, Virginia
23464

Dear Danette,

I have received information from the following companies concerning the cost of Closed Captioning your television program, "Joy in the Morning".

The approximate cost based on my discussions and information will run about \$300-\$360 per half-hour program. This will include off-line production and encoding per half hour and you will need to provide tape stock and shipping.

CPC Computer Prompting & Captioning Co.
1010 Rockville Pike, Suite 306
Rockville, MD 20852, USA

Phone: 301-738-8487
Fax: 301-738-8488
TTY: 301-738-8489
Toll Free: 800-977-6678

Pop-on mode: \$7/min. of video
+ \$150 setup fee

Roll-up mode: \$5/min. of video
+ \$150 setup fee

(You provide transcript & blank tape)

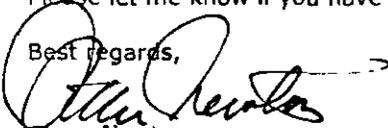
.....
Add \$3/min. of video if CPC transcribes.

Texcoma Captions
Dallas, Texas

I contacted this company and was told that it is a little cheaper if they can do several (8-10) programs at a time. They have an Engineer who would set up the equipment and do the captioning onto your tape stock. The off-line cost is approximately \$300 per half hour plus the cost of your tape and shipping and handling costs.

Please let me know if you have any questions concerning this matter.

Best regards,


Steve Newton
President
Newton Media