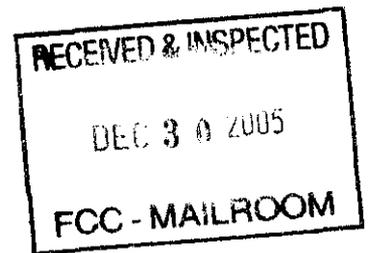


CG-B-CC-0161



December 28, 2005

FCC  
Attn: Secretary's Office  
Closed Captioning  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

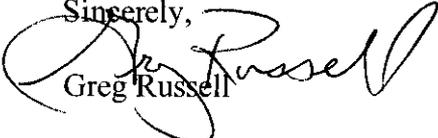
RE: Request for exemption from commission's closed caption rules

To Whom It May Concern:

I am writing in regards to the Commission's closed captioning rules. I produce a local movie review show called "The Movie Show Plus", which appears once a week on only one local broadcast station here in Detroit (WDWB). Compliance would impose an undue burden on our show for the following reasons according to section 79.1 d of the Commission's rules for captioning:

1. We are locally produced and our show is non-news with no repeat value. We talk about movies that open on the coming weekend. We show movie trailers and junket interviews for the films. After that weekend the show has no repeat value what so ever.
2. We have a barter deal with the station, where they sell 50% of the commercials and we sell the other 50%. On a good week we may make \$500.00. The average is \$200.00 to \$300.00. Places that we have checked that do the closed captioning locally as well as businesses out of town average \$350.00 to \$400.00 or higher to caption a 21 minute show. That cost well exceeds 2% of our gross revenue for the year.

Ours is a small minority owned production company. My producing partner and I have regular jobs, which is what we live off of. This show is a labor of love and something we truly enjoy doing and the show has quite a following in the movie community here in Detroit. What ever you need for us to send you in regards to this matter we will do. I have submitted my contact information below. We respectfully request that "The Movie Show Plus" be exempted from the close captioning requirement for the above stated reasons. Thank you very much for your time.

Sincerely,  
  
Greg Russell

Here's our contact information.

Greg Russell  
18543 Norwood  
Detroit, MI. 48234  
313-399-0683  
gregrussell23@aol.com