

CGB-CC-0236

Platinum Television Group "Setting The Standard In Educational Programming"

Platinum Executive Center • 1000 East Hillsboro Blvd., Studio 105 & 205 • Deerfield Beach, Florida 33441 • Phone: 954.570.5558

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www.platinumtelevision.com

RECEIVED & INSPECTED
JAN 4 - 2006
FCC - MAILROOM

Federal Communication Commission
445 12th Street SW
Washington, D.C. 20554

To Whom it May Concern:

We are a small production company that produces ½ hr. paid programs in an educational format. We exist by producing low budget, high-quality shows, and purchasing very inexpensive paid program 1/2 hr. time slots, normally between 6:00 AM and 6:00 PM. The introduction of the new closed captioning of 2006 is detrimental to our business and existence due to the fact that we do not currently possess the necessary closed captioning equipment, nor do we have the ability to hire the additional personnel that would be needed to transcribe our shows, or even purchase the expensive equipment needed to close caption the 50-60 different tapes we custom create for various stations around the country each month, i.e. 600-700 tapes per year. We have received several quotes from Closed Captioning shops such as T.M. Systems, Accord and NCI and Caption Max and all are in the \$335-425 per ½ hr. tape range.

Most importantly, on average, our productions air in a ½ hr. time slot that costs \$200. Therefore, this \$335-425 per tape average is most often more expensive than the ½ hr. airtime slot we purchase for the tape alone!

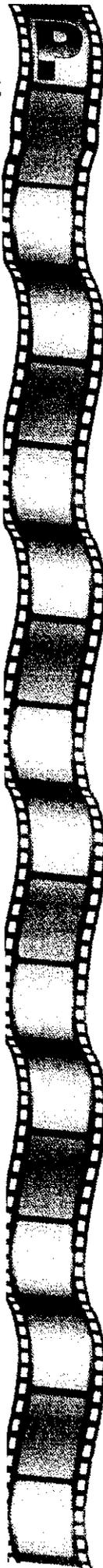
This would present a minimum **\$15,000** additional monthly expense to my department and our overall business model, not including the additional personnel steps needed such as transcriptioning, which is very labor-intensive, additional overnight shipping expenses of tapes, etc.

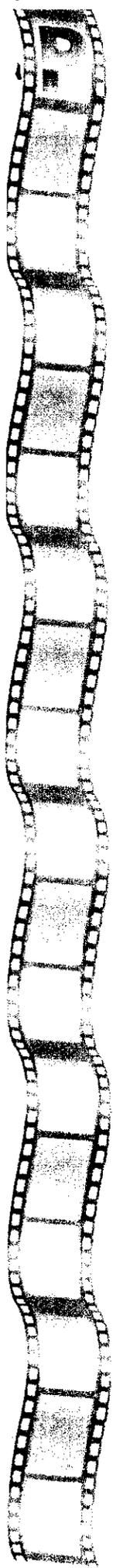
Hand signal interpretation is not a viable alternative as each tape we produce includes a custom mix or compilation of various segments we produce and would require a full-time hand signal specialist to be on call in our facility around the clock, which we also can not accommodate.

We hereby request exemption from closed captioning for our ½ hr. productions due to the extraordinary burden it would impose to our financial well-being in our post production department, which consisting of only 2 employees can not feasibly accomplish, without additional hires, equipment, and overall, expenses that threaten the companies viability to compete for sponsors and airtime, etc.

Sincerely,

Gary Baris
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3 Captioning Quotes

Hi Gary,

It was a pleasure to speak with you today. I appreciate the opportunity to provide you with a quote for these services. I forgot to ask you....how did you hear about us?

To reiterate what you told me, you have a 28:30 program that be coming once a month on Beta SP. You can provide a transcript of the program as well as the blank Beta SP stock for captioning.

We can give you a rate of \$425 for each half hour program. Turn-around for each program is 3 days.

Thanks again, and please let me know if you have any questions.

Sincerely,

Derek Hines

Derek Hines
Vice President, Marketing
LNS Captioning
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Portland, OR 97219
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toll-free: 800-366-6201
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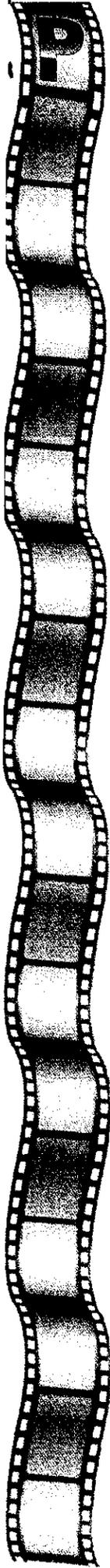
Hi Gary. it was nice speaking with you. Here is the breakdown of the pricing for the closed captioning of "Business and Beyond." Please let me know if you have any questions. I look forward to possibly working with you.

thanks.

Timed Roll-Up captioning = \$350 per program hour or \$175 per 30-min episode
Beta SP encoding = \$160 per 30-min episode

Platinum Television pays = **\$335.00 per half-hour episode**
**Pricing includes tapestock and shipping fees from the NCI facility. Beta SP dubs are an additional \$40 per 30-min episode if needed

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Thank you for your Email! We do indeed offer software which will allow you to create the captions that are mandated by the FCC. The product name is the Swift 5 System, and this is in fact the leading product in the market. Our client list represents a who's who of the industry, with leading caption houses using the Swift system. A sample list of clients includes Alliance Atlantis, Captioneering, CaptionMax, E! Entertainment, Golf Channel, GSN Networks, LNS, Media Captioning Services, National Captioning Institute, Turner, Visual Sound, WGBH, etc.

There are a host of features designed to ensure maximum productivity, and thereby the least amount of time to create captions. A ballpark typical price of a small system suitable for your needs (including a line 21 closed captioning workstation, a digitizer and 'video importing' software) is around \$20k. The alternative approach is for us to provide you with a list of companies which may be able to provide a caption creation service to you.

I've attached a group of datasheets which walk you through the product. I would also be delighted to answer any queries you may have. You can reach me at 203-354-4602, extension 721.

All the best,
Sam.

Sam Pemberton
Softel-USA : Enabling iTV™

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