

CEB-CE-0096

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3220 West 15th Avenue - Gary, Indiana 46404 - (219) 944-3450 or (708) 832-1343

December 20, 2005

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: New Closed Captioning Requirements (January 1, 2006)

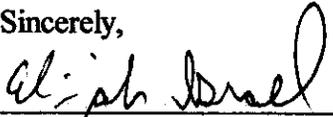
To Whom It May Concern:

I am writing about the new closed captioning requirements beginning January 1, 2005. I am the President of a small non-profit (50C3) organization /church located in Gary, Indiana. We have been in existence for over nine years and have about one hundred regular members. We presently air a thirty-minute program "Thy Kingdom Come Ministries" in a few markets.

Though we see the need and agree with the premise of providing closed captioning to the hearing impaired, to do so would be a great hardship and possibly cause us to go off the air. If forced to close caption, we would be unable to continue providing unique shows on a 52-week basis, since we air excerpts from our weekly services and produce our programs in-house using only volunteers. Furthermore, the cost to provide closed captioning for each show would decimate our resources, as we are already operating with an overall low budget. With this in mind, we request that you grant us an "undue burden waiver" of the new closed captioning requirements.

Again, we agree with the premise of providing closed captioning and have diligently researched the matter. Our research showed that we are 3-5 years away from being able to provide this valuable service on our media. We looked at both options: Producing closed captions in-house by purchasing the equipment and also purchasing the service from a captioning provider. Neither option was close to being feasible. Not only was the equipment too expensive, but also we lack the technical skills to operate it. We contacted numerous captioning providers such as: National Captioning Institute of Vienna, Virginia; ViewCom Tech of Seattle, Washington; and ATI Tech of Thornhill, Ontario, CN. The quotes ranged from \$250-\$320 per episode to caption, which is 30%-40% of our cost to air each show. The turn-around time to get the show captioned and back to air was also impossible.

We respectfully ask that you review this information and grant the "undue burden waiver".

Sincerely,

Elijah Israel
Teacher