

CGB-CC-0257



BULL STREET BAPTIST CHURCH

17 East Anderson Street
(Corner of Bull and Anderson Streets)
Savannah, Georgia 31401
(912) 236-1511

RECEIVED & INSPECTED
JAN 6 - 2006
FCC - MAILROOM

December 30, 2005

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

Dear Sirs:

I am requesting an exemption from the requirement of closed captioning the morning worship service of Bull Street Baptist Church in Savannah, Georgia, referencing (8) of Section 79.1 (d) of the commission's rules exemptions:

(8) Locally produced and distributed non-news programming with no repeat value. Programming that is locally produced by the video programming distributor, has no repeat value, is of local public interest, is not news programming, and for which the "electronic news room" technique of captioning is unavailable.

We are a locally produced and distributed non-news program with no repeat value. Though, in one of your bulletins you illustrate "parades and school sports," I do not take that to be exclusive since it is preceded by e.g.

Bull Street Baptist has been televising a morning worship service to the local community for 35 years. The service is a public service to shut-ins and others in the community who cannot attend worship services in the local church. We do not ask for money or solicit any response during the program nor do we maintain a mailing list or in any other way ask for donations to produce this service. The funds to produce the live televised worship service come from the budget of Bull Street Baptist Church which is supported by its membership annually. All of our operators and directors are member-volunteers and we air the signal via microwave to WJCL Television, our local ABC affiliate. Unlike taped programs, the worship service is unedited and the cameras simply broadcast what is happening in the sanctuary of Bull Street Baptist Church at 11:00 each Sunday morning. We do not rebroadcast the worship service in any way including cable or any other commercial television station.

We respectfully request that you look favorably on our request to exempt from closed captions requirements the Morning Worship Service of Bull Street Baptist Church, Savannah, Georgia, which is televised live, by WJCL television.

Yours truly,

William E. Gardner, Jr.
Assistant Minister