

CGB-CC-0543



# FAMILY OF FAITH CHRISTIAN CHURCH

PASTOR GREGORY & FIRST LADY ELIZABETH LITTLEFIELD  
Impacting Families With The Word Of Faith

RECEIVED & INSPECTED  
JUN 20 2006  
FCC - MAILROOM

June 8, 2006

Office of the Secretary  
Federal Communications Commission  
Attention: CGB Room 3-B431  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

## Petition for Exemption from Closed Captioning Requirements

### “Works of Faith Broadcast”

Family of Faith Life Ministries, DBA Family of Faith Christian Church  
P.O. Box 120046  
Tyler, TX 75712  
(903) 592-3340  
(903) 592-0002 (Facsimile)  
E-mail: [info@familyoffaith.com](mailto:info@familyoffaith.com)

### Introduction:

“Works of Faith Broadcast” is a television program produced completely on the premises of Family of Faith Christian Church, Tyler, TX... Family of Faith has been in existence for over 12 years and believes that it has an integral mission to the community. The Mission Statement for Family of Faith Christian Church is “*Impacting Families With The Word of Faith*”. We hope to do all that by showing the grace, love, and mercy of our Savior in our everyday actions.

“Works of Faith Broadcast” is an edited version of our Sunday morning and Wednesday evening worship services. We believe it helps our church to reach the unsaved, the uncommitted, the unchurched and the untaught. Every worship service is shown on a delayed basis.

Each episode of “Works of Faith Broadcast” is 29 minutes long. It airs every Sunday morning at 7:30 a.m., Monday through Friday at 6:30 a.m. and Monday through Thursday 12:30 a.m. on UPN18 across East Texas. The programs that air are services from the previously recorded worship services. The program is shot, produced, and edited here at our church. It is completely done by church volunteers with the assistance of myself, the Senior Pastor. The program consists of our Sunday morning and Wednesday evening services. It typically includes singing, prayer, and a sermon from our pastor.

For the reasons set forth below, Family of Faith Christian Church of Tyler, TX hereby request an undue burden exemption from the closed captioning rules for "Works of Faith Broadcast", pursuant to 79.1 (f) of the Commission's rules.

### **Nature and Cost of Close Captions**

Closed captions Maker in Baltimore ads closed captioning to produce videos. A ½ hour program like we produce would cost in the neighborhood of \$315.00 per program per week not including the cost of us shipping overnight to the company. There is a two business day turn around for this service. Subtitles and scrolls of the entire services would be incredibly costly due to increased man hours and the potential of losing our volunteers who help with the service due to those to fulfill all areas of this ministry. Also, time involved in closed captioning would severely delay our broadcast to the point that sometimes it would be outdated. (Letter from companies estimating cost for closed captioning will be provided upon request.)

### **Impact on the operation of the program provider**

The total cost of producing and showing "Works of Faith Broadcast" for one month runs somewhere in the neighborhood of \$2600.00. This cost does not include any "in kind" cost that would be associated with the various volunteer man hours necessary to complete the production of the entire show. As you can see from the closed captioning estimates, the cost of each show would possibly bring an end to this broadcast altogether. "Works of Faith Broadcast" does not solicit money on air and is completely paid for through the members of the church.

### **Financial resources of the program provider**

Family of Faith Christian Church, Tyler, TX is a 501c3 tax exempt religious organization. We operate on yearly budget provided by the tithes and offerings of our members. The recent addition of locally televising our program to the surrounding area was a large step of faith on our part. To add to the cost of the production of the programming would put an incredible large burden on our budget and steer funds away from other ministries in which our church participates. Our local affiliate, CBS19 in Tyler, TX does not provide or offer the service of closed captioning to us.

### **Type of Operations of the Program Provider**

As stated earlier, our church is a non-profit organization. Our Sunday morning and Wednesday evening service is the only programming we provide. Our other major operations and activities are geared locally toward community outreach and support.

**Other factors**

Petitioner believes that the local, non-news exemption to the closed captioning rules also applies to "Works of Faith Broadcast". As noted above, the program is produced and distributed locally, and the sermons of Family of Faith Christian Church are primarily local public interest. The episodes are not news, they do not have repeat value, and the electronic newsroom technique is not available. Notwithstanding the applicability of the exemption, we have filed this petition in abundance of caution and for the purpose of establishing certainty.

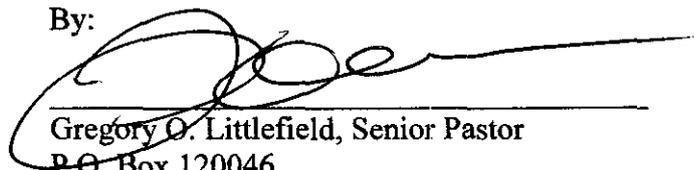
**Conclusion**

As shown by this Petition, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The cost of captioning would be excessively high and would have a significant impact on Petitioners operations. The Petitioners type of operations and financial resources are different in kind and magnitude from a mainstream programming provider. Because of the significant difficulty and expense of providing closed captions: a waiver under 79.1(f) is warranted. If more information is needed, please contact me at the address provided below.

Living In His Grace,

Family of Faith Christian Church

By:



Gregory O. Littlefield, Senior Pastor

P.O. Box 120046

Tyler, TX 75712

(903) 592-3340

June 8, 2006

Enclosed: 501c3 Determination Letter  
Petition for Waiver  
Declaration

Declaration:

I, Gregory O. Littlefield, Senior Pastor of Family of Faith Christian Church, and I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of Family of Faith Christian Church in this matter, and upon information and belief, believe the statements regarding our organization and "Works of Faith Broadcast" to be true and accurate.



Senior Pastor Gregory O. Littlefield

6-8-2006

Date

GENERAL AFFIDAVIT

State of Texas  
COUNTY OF SMITH

BEFORE ME the undersigned Notary, Linda Givens,  
on this 12 day of June, 2006, personally appeared  
Gregory Littlefield, known to me to be a credible person and of  
lawful age, who being by me first duly sworn, on his oath, attest to and affirms the above  
facts.

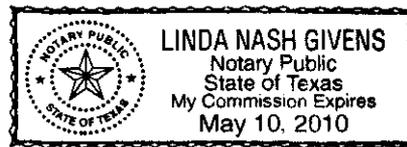
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Family of Faith Life Ministries, DBA Family of Faith Christian Church  
Pastor Gregory O. Littlefield  
P.O. Box 120046  
Tyler, TX 75712

Subscribed and sworn to before me, this 12 day of June, 2006

Linda Nash Givens  
Signature of Notary

LINDA NASH GIVENS  
Printed Name of Notary



NOTARY PUBLIC

My commission expires: May 10, 2010