

CGB-CC 0775



March 2, 2006

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FCC - MAILROOM

Commission's Secretary,
Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431.
445 12th Street, SW,
Washington, DC 20554

Subject: Exemption to the Closed Captioning Rules

To Whom it May Concern:

Chosen Generation is the nonprofit media ministry of the River of Life Christian Center of Orlando, Florida (ROLCC). The mission of the River of Life Christian Center of Orlando is to reach the world with the message of the Gospel of Jesus Christ. The television broadcast is one of the medium by which we preach the word of God to thousands of people living in the greater Central Florida region.

Chosen Generation is hereby requesting an exemption from the closed captioning rules for the River of Life Christian center of Orlando, pursuant to Section 79.1(d) of the commission's rules for the reasons set forth below:

Nature and Cost of Close Captions

We contacted the Closed Caption Maker company to determine the cost of their services. Based upon our conversation with them, we could purchase the hardware and software to produce the closed captioning for \$2,000. Additionally we would need to hire additional staff to handle the verbatim transcription of the sermons. It takes approximately 2-3 hours to transcribe one 30 minute program. We could outsource this service for approximately \$45 per episode for a total annual cost of \$18,750; however, we would have to change our broadcast schedule to accommodate the needs of the vendor. We believe that would place an undue burden on the ministry. Our gross revenues for 2005 were \$631,976.10. The cost of the transcription alone is more than 2% of the gross revenues of the ministry for the last fiscal year.

Impact on the Operation of the Provider Program

The total cost of the Chosen Generation broadcast on an annual basis is \$68,655 or \$ 165.03 per episode. Closed captioning would increase that cost by approximately \$200 or 121%. That increase alone would make it virtually impossible for The ROLCC to continue to produce the program.

The increase is not budgeted in 2006 and would probably not be likely to be approved for inclusion in any proposed budgets for the future. If forced to absorb the additional cost, the church may be forced to eliminate programs to provide closed captioning for the broadcast.

Financial Resources of the Program Provider

The ROLCC is a tax-exempt, non-profit organization. Our most recent balance sheet is attached. We depend solely on contributions from the members of the church to fund our programs each year. Our main expenditures are for the staff and other resources necessary to provide ministries and services to the community and to members of the church.

Other Factors

We believe that the local, non-news exemption¹ to the closed captioning rule also applies to the Chosen Generation broadcast. As noted above, the program is produced and distributed locally, and the sermons of ROLCC are of primarily, if not exclusively, 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 this exemption, we have filed this petition out of abundance of caution and for the purpose of establishing certainty.

Conclusion

As shown by this petition and its attachments, 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 Petitioner's operations. The Petitioner's 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 section 79.1(f) is warranted. If more information is needed, please contact me at the address provided below.

In His Service,



Marvin A. Jackson, Senior Pastor
River of Life Christian Center of Orlando

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¹ This exemption is self-implementing, and therefore, Petitioner notes its applicability without expecting or requesting FCC action on it.

GENERAL AFFIDAVIT

State of Florida
County of Orange

BEFORE ME the undersigned Notary,

Debra Jones, on this 1st of April
day of April, 2006, personally appeared Marvin A Jackson know to me to be a credible
person and of lawful age, who being by me first duly sworn, on his oath, attests to and
affirms the above facts.

Marvin A Jackson, Senior Pastor River of Life Christian Center
44 N Coburn Ave
Orlando, FL 32805

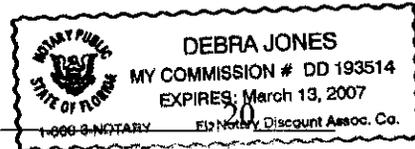
Subscribed and sworn to before me, this 1st day of April 2006.

Debra Jones
(Signature of Notary)

Debra Jones
Typed name of Notary

NOTARY PUBLIC

My commission expires: _____



River of Life Christian Center of Orlando

Balance Sheet

As of December 31, 2005

	<u>Dec 31, 05</u>
ASSETS	
Current Assets	
Checking/Savings	
Suntrust - checking	59,246.36
Suntrust Savings -	131,779.60
Suntrust Tax Deposit Chec...	1,000.00
Total Checking/Savings	<u>192,025.96</u>
Accounts Receivable	
Accounts Receivable	2,330.00
Total Accounts Receivable	<u>2,330.00</u>
Other Current Assets	
A/R-Return Checks	748.19
Security and Utility Deposits	250.00
Total Other Current Assets	<u>998.19</u>
Total Current Assets	195,354.15
Fixed Assets	
1999 Audi	14,243.88
Audio/Visual Equipment	7,977.31
Broadcast, Sound and Music ...	14,402.91
Computer Hardware/Software	5,709.27
Furniture and Fixtures	3,014.58
Hammond B3 Organ	3,454.44
Leasehold Improvements	706.09
Other Assets	136.98
Sanctuary Furniture and Fixt...	668.62
Vehicle	0.00
Vehicle - Mercedes Sedan	9,985.50
Total Fixed Assets	<u>60,299.58</u>
Other Assets	
Turn Key NewTek Software/...	25,704.00
Total Other Assets	<u>25,704.00</u>
TOTAL ASSETS	<u>281,357.73</u>
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	6,351.99
Total Accounts Payable	<u>6,351.99</u>
Credit Cards	
Office Depot	3,112.91
Total Credit Cards	<u>3,112.91</u>
Other Current Liabilities	
Direct Deposit Liabilities	2,459.43
Total Other Current Liabili...	<u>2,459.43</u>

03/01/06

Accrual Basis

River of Life Christian Center of Orlando

Balance Sheet

As of December 31, 2005

	<u>Dec 31, 05</u>
Total Current Liabilities	11,924.33
Long Term Liabilities	
Comco Lease/Evans Natio...	<u>19,278.00</u>
Total Long Term Liabilities	<u>19,278.00</u>
Total Liabilities	31,202.33
Equity	
Beta Deck - Media	3,400.00
Chosen Generation	23,745.35
Future Use Reserves Operati...	47,098.69
Investment in Fixed Assets	44,454.77
Oasis Foundation	131,730.68
Opening Bal Equity	-695.09
Vision Partners	<u>421.00</u>
Total Equity	<u>250,155.40</u>
TOTAL LIABILITIES & EQUITY	<u><u>281,357.73</u></u>

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Accrual Basis

River of Life Christian Center of Orlando

Profit & Loss

January through December 2005

	Jan - Dec 05
Ordinary Income/Expense	
Income	
Adult Ministries	
Women of the Word	1,014.00
Total Adult Ministries	1,014.00
Books Sales	412.86
Special Offerings	422.37
Tape Ministry	4,286.75
Tithes & Offerings	631,976.10
Youth Ministries	
Summer Camp 2005	8,276.50
Youth Ministries - Other	1,967.02
Total Youth Ministries	10,243.52
Total Income	648,355.60
Gross Profit	648,355.60
Expense	
Cornerstone Partner (Oasis)	7,233.85
Payroll Expenses	43,712.27
Bookstore	383.04
Building Costs	
Building Renovations	534.11
Carpet	757.00
Furniture	214.22
Security Monitoring Service	-78.84
Total Building Costs	1,426.49
Fixed Expenses	
Insurance-Liability	3,474.76
Insurance-Vehicle	4,106.05
Rent	58,210.94
Total Fixed Expenses	65,791.75
General Expenses	
Advertising & Promotions	550.00
Auto repair	5,522.54
Awards & Incentives	
Membership Services	54.99
Youth Ministry	250.00
Awards & Incentives - Other	2,110.00
Total Awards & Incentives	2,414.99
Bank Service Charges	4,277.97
Building Maintenance	5,242.36
Casual Labor	200.00
Cleaning Service	5,935.90
Depreciation Expense	18,631.61
Equipment	
Audio/Visual	1,016.25
Basketball Goal	194.46
Computer	2,599.76

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Accrual Basis

River of Life Christian Center of Orlando

Profit & Loss

January through December 2005

	<u>Jan - Dec 05</u>
Office	419.98
Total Equipment	<u>4,230.45</u>
Equipment Lease	
Computer Lease	1,943.14
Equipment Lease - Other	4,293.81
Total Equipment Lease	<u>6,236.95</u>
Fellowship Activities	
A/V Ministry	343.47
Education-Internet Cafe	94.84
Hosp/SEC Ministry	1,130.96
Membership Services	243.96
Men's Ministry	200.00
Outreach Ministry	111.59
Singles Ministry	173.29
Ushers/Greeters Ministry	71.75
Women of the Word	200.31
Youth - SOI	
Summer Camp 2005	1,016.25
Youth - SOI - Other	11,512.28
Total Youth - SOI	<u>12,528.53</u>
Fellowship Activities - Other	2,100.49
Total Fellowship Activities	<u>17,199.19</u>
Finance Charge Expense	1,095.12
Fuel	46.00
Honorariums	20,500.00
Interest Expense - Evans	1,299.48
Lawn Service	1,295.00
Licenses & Permits	48.70
Membership Fees	60.00
Miscellaneous	1,519.18
Music	135.00
Pastor's Library	161.87
Postage and shipping fees	3,356.36
Postage Fees	130.38
Printing Costs	11,247.80
Professional Fees	7,946.81
Rental Fees	1,080.80
Security Monitoring Service	1,884.73
Seminars/Training	
A/V Department	1,200.00
Leadership	293.92
Outreach Ministry	122.10
Youth Department	93.03
Total Seminars/Training	<u>1,709.05</u>
Supplies	
Audio/Visual Ministry	6,730.94
Dance Ministry	687.91
Education Center-Internet Cafe'	363.32
Finance Department	2,278.25

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Accrual Basis

River of Life Christian Center of Orlando

Profit & Loss

January through December 2005

	<u>Jan - Dec 05</u>
Hospitality	875.21
Membership Services	868.78
Music Ministry	1,612.30
Music/Praise Ministry	4,590.58
Outreach Ministry	1,187.07
Pastors - miscellaneous	1,714.61
Special Events	697.30
Ushers/Greeters Ministry	376.52
Women of the Word	97.50
Youth - SOI	
Summer Camp 2005	532.82
Youth - SOI - Other	3,519.25
Total Youth - SOI	4,052.07
Supplies - Other	172.23
Total Supplies	26,304.59
Supplies-Altar Care	1,357.36
Supplies-Janitorial	1,948.88
Supplies - Office	2,211.28
Tape Ministry	1,874.77
Tax Expense	48.70
Telephone	3,825.48
Travel/Conferences	
Church Leadership	1,972.50
Youth - SOI	
Summer Camp 2005	1,752.40
Youth - SOI - Other	7,757.42
Total Youth - SOI	9,509.82
Travel/Conferences - Other	4,111.83
Total Travel/Conferences	15,594.15
Utilities	
Cable - Wireless Network	1,395.11
Utilities - Other	15,976.82
Total Utilities	17,371.93
Total General Expenses	194,495.38
Membership Services	
Benevolence	
Monetary	18,001.88
Non-Monetary	1,484.12
Total Benevolence	19,486.00
Media	
Television Broadcast	
TV 45	41,654.00
Television Broadcast - Other	27,001.00
Total Television Broadcast	68,655.00
Media - Other	205.00

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Accrual Basis

River of Life Christian Center of Orlando

Profit & Loss

January through December 2005

	<u>Jan - Dec 05</u>
Total Media	68,860.00
Missions	5,000.00
Total Membership Services	93,346.00
Pastorial Care	419.62
Personnel	
Clothing Allowance	3,122.20
Compensation - Senior Pastors	12,000.00
Health Insurance	15,290.11
Honorarium/Staff	50,760.84
Housing Allowance	
Housing Allowance - New Ho...	77,323.40
Housing Allowance - Other	17,883.81
Total Housing Allowance	95,207.21
Musicians	24,680.60
Summer Camp 2005	6,880.00
Vacation - Pastors	5,267.19
Total Personnel	213,208.15
Uncategorized Expenses	
Bank Deposit Corrections	118.02
Uncategorized Expenses - Other	34.94
Total Uncategorized Expenses	152.96
Total Expense	620,169.51
Net Ordinary Income	28,186.09
Other Income/Expense	
Other Income	
Bank Service Charges	0.00
Benevolence	19,752.13
Dance Ministry	472.00
Fellowship Activities	56.00
Hurricane Katrina Relief	0.00
Interest Income	567.68
Love Offering - Pastor Deborah	150.00
Love Offerings-Pastor	70,641.80
Miscellaneous	
T-Shirt Sale	716.50
Miscellaneous - Other	28,148.12
Total Miscellaneous	28,864.62
Operating Reserves	-77,711.38
Professional Fees	230.61
Supplies - Janitorial	100.81
Telephone Expense	150.00
Youth Ministry	361.13
Total Other Income	43,635.40
Other Expense	
Interest Expense	797.08

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Accrual Basis

River of Life Christian Center of Orlando

Profit & Loss

January through December 2005

	<u>Jan - Dec 05</u>
Love Offering-Pastor	70,045.29
Love Offering - Deborah Jackson	150.00
T-Shirt Expense	829.12
Total Other Expense	<u>71,821.49</u>
Net Other Income	<u>-28,186.09</u>
Net Income	<u><u>0.00</u></u>