

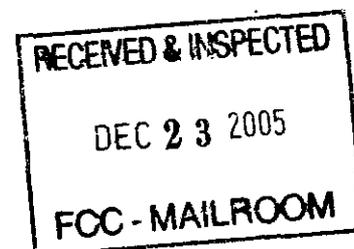
First United Methodist Church



CHRIS H. ANDREWS
MINISTER

December 21, 2005

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B432
445 12 St. SW
Washington, DC 20554



Re: Closed Captioning Compliance Statement

First United Methodist Church, Baton Rouge, Louisiana, certifies to WAFB Television that the broadcast by the station of our weekly church service is exempt from the closed captioning requirements of the Federal Communications Commission (47 CFR ~ 79.1(d)(8) exemption for "locally produced and distributed non-news programming with no repeat value" because the weekly church service program which is co-produced in cooperation with the station:

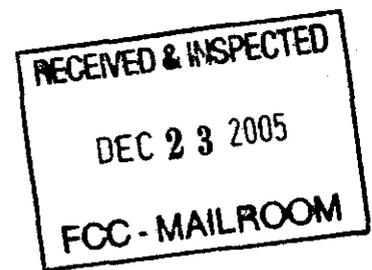
- Is not news programming;
- Is of specific local interest to residents of the station's service area;
- Is not repeated or redistributed; and
- Is not scripted so that electronic news room closed captioning would be unavailable.

If there is any change in the above information, we will provide immediate written notice to the station.

First United Methodist Church

Chris H. Andrews, Senior Minister
December 21, 2005

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



Petition for Exemption from Closed Captioning Requirements

Introduction

First United Methodist Church is located in downtown Baton Rouge, Louisiana. The church was founded in 1836 and has occupied its present location since 1924. The stated mission of the First United Methodist Church is: "To make disciples of Jesus Christ."

First United Methodist Church broadcasts a 30-minute edited version of its principle worship service on WAFB Television at 9:30AM on Sunday morning. This broadcast is affirmed by members of the Baton Rouge community and WAFB viewing area as a spiritual blessing that enables people to share in the worship of God when they are prevented by circumstances of illness, work, or life situation from attending a church in their community.

The broadcast is produced entirely by volunteers who are members of the congregation of First United Methodist Church.

Nature and Cost of Closed Captions

It would be prohibitively expensive to use closed captioning for this broadcast. And, the nature of the program is such that it is unscripted, thus making closed captioning highly impractical.

Impact on the Operation of the Program

It costs First United Methodist Church \$1000+ per week to broadcast an edited version of the worship service. In addition there is the cost of equipment needed to record the broadcast, which each year must be updated. Captioning would double the cost of the broadcast, resulting in a cost that would be too heavy for the church to bear.

Financial Resources of First United Methodist Church

First United Methodist Church is supported by the voluntary donations of its members. No funds are solicited through television and the church receives very little financial support from its viewing audience (less than \$1000 per year). Captioning would mean that funds designated for the mission of the church would have to be diverted to this end, and the congregation's leadership would not approve this.

Type of Operation of First United Methodist Church

First United Methodist Church conducts a traditional ministry of proclamation of the Gospel of Jesus Christ and has programs that enable people to grow as Disciples of Christ. The church is, of course, non-profit. The television broadcast is produced and distributed locally, and the sermons are of 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 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 on the church. 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 ~79.1(f) is warranted.

If more information is needed, please contact me at the address provided below.

Respectfully submitted,

By:

Chris H. Andrews, Senior Minister
First United Methodist Church, Baton Rouge, LA
930 North Blvd.
Baton Rouge, LA 70802

December 21, 2005