

The Way of God Church of The Lord Jesus, Inc.

3013 S. Rainbow Drive, Suite A
 Decatur, GA 30034
 www.thewayofgodchurch.com
 (404) 381-0552

Federal Communications Commission
 Attention: CGB Room 3-B43 1
 44s 12th street SW
 Washington, DC 20554

APR 04 2007

Distribution Center

March 9, 2007

To Whom It May Concern:

This is a formal petition for exemption to the Closed Captioning requirement on the basis of undue burden 47 C.F.R. & 79.1 (f).

The Way of God Church of The Lord Jesus' broadcast is a local production of weekly church worship services. We are a small church located in the city limits of Decatur, GA. The program began 3 ½ years ago **as** a ministry **to** inform local residents of the church's location, style of worship, and to provide Bible teaching.

We are aware that **ION** Media Networks is under new requirement to provide closed captioning for its programming. Though we understand the need and appreciate the value of closed captioning for many viewers and would like to eventually comply with this policy, we are petitioning for an exemption. Should we supply captions to our programming this would result in an undue burden **as** we air our weekly program. The reasons why this would result in an undue burden are **as** follows:

1) The nature and cost of the closed captioning for the programming

The program is a ½ hour Christian teaching outreach program recorded live at our church. The price quoted to us for closed captioning is \$300. The actual broadcast cost would be **\$450** which equals \$750 per week for 52 weeks at a **total** of \$39,000 per year. According to your website phrase "undue burden" is defined **as** "significant difficulty or expense". We believe \$39,000 per year constitutes significant expense.

2) The impact on the operation of the provider or program owner

Because we are a church, a non profit organization, and all money that comes in is from donations. Spending decisions are often based on a determination of where the money **can** benefit the most people in the cause for **Christ**. Adding \$39,000 to the production costs of **our** weekly TV program may result in the decision to cancel the program.

Not being on TV would negatively impact the people who possibly can't get to church and rely on it **each** week to be fed the Word of God.

Also the purpose of this broadcast/outreach is to present relevant teaching messages in a timely fashion that are in line with what is being taught each Sunday at the church.

We attempt to create a new program each week so that the previous week's teaching is on the air the following Sunday. Sending out the program for closed captioning would add at least a week to this schedule.

3) The financial resources of the provider or program owner including efforts to solicit captioning assistance from distributors of its programming and the distributors' responses

We cannot solicit assistance from distributors because we have none. The program airs on 1 local station, and is produced at the church. At the beginning and end of each broadcast we have written information if someone needs to reach us.

4) The type of operations of the provider or program owner

We are a non profit Holiness Church. We do not have advertisers to defray the production and broadcast costs making and airing the program. It is an outreach, a public service. Our church family is small and we do not have the necessary funds to support adding captions for our program. Our program will be watched by many members of our community and congregation who are unable to get to church due to physical limitations or health issues. Our program provides the spiritual education and fulfillment that can not be experienced on site. The Way of God Church of The Lord Jesus does not employ a broadcast media staff. Our camera and editing positions are filled by members of the church who are already struggling to keep up with radio, TV and internet production deadlines. At present, we are trying to offer the previous week's message each Sunday, so this gives us a very short production window to be able to edit, post produce and deliver a new program by the following Thursday. Adding the new step of captioning ourselves or sending the program out to a service would make this schedule impossible. The cost of providing additional staff positions to supply in house captioning is not a possibility for us.

We believe that, under present conditions, these factors would combine to meet the FCC standard of an "undue burden" on our resources and staff. Unfortunately, at this time it would cause an undue burden for our church family.

Thank you for your consideration in this matter and look forward to hearing from you soon.

Sincerely,



Elder Tony Smith, Pastor

The Way of God Church of The Lord Jesus

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For period January 1, 2006- December 31, 2006

INCOME:

Tithes and Offerings	\$117,369.64
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TOTAL INCOME:	\$117,369.64
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OPERATING EXPENSES

Help to needy	\$33,473.78
Radio Broadcast	\$7,379.00
Insurance	\$2,030.00
Television Broadcast	\$30,070.00
Utilities	\$10,851.25
Rent	\$12,100.00
Property Mortgage	\$7,335.00
Supplies	\$2,067.00

TOTAL OPERATING EXPENSES:	\$105,306.03
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NET PROFIT:	\$12,063.61
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