

CGB-cc-0766



Christian Joy Center

Dr. Mike Brown
Senior Pastor

December 17, 2007

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

RECEIVED & INSPECTED
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FCC - MAILROOM

Subject: Exemption to the Closed Captioning Rules

To Whom it May Concern:

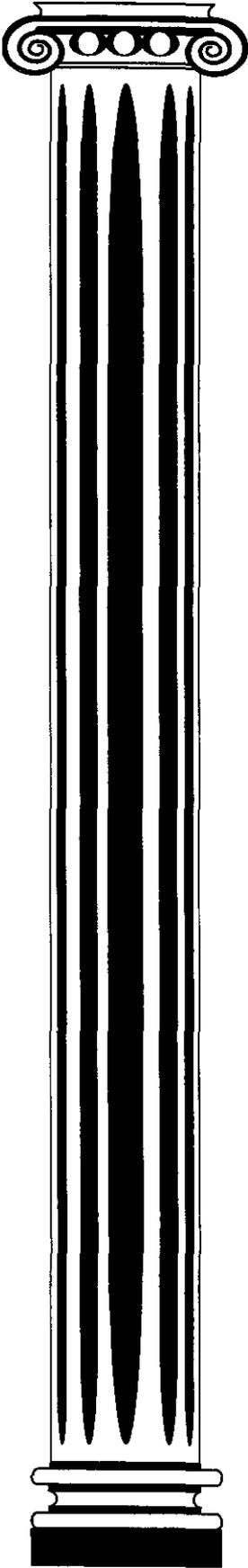
Changing Lives in Changing Times is the nonprofit media ministry of Christian Joy Center of El Paso, Texas. The television broadcast is one of the mediums by which we preach the word of God to thousands of people living in El Paso, Texas and millions of people in the United States. Since our television broadcast has been on the air, we have received countless testimonies by way of: letters, phone calls, e-mails and personal visits to our church, expressing how much Changing Livings in Changing Times have made a positive impact upon their life. Solely, Christian Joy Center members financially support Changing Lives in Changing Times television broadcast. Changing Lives in Changing Times airs on KSCE every Sunday at 6pm (CST) on: UHF Channel 38, Cable 16 and DIRECTTV Channel 38 local in the greater El Paso, Texas area, and on World Harvest Television every Wednesday at 12pm (EST), on DIRECTV Channel 321 nationally.

For the reasons set forth below, Christian Joy Center hereby request an undue burden exemption from the closed captioning rules for Changing Lives in Changing Times, pursuant to 79.1 (f) of the Commission's rules.

Nature and Cost of Closed Captions

We have checked extensively and found the average cost to produce a program suitable with FCC regulations is \$300 per program, costing us roughly \$2,700 a month in production alone. To purchase a Time Code Based Captioning System, including the DVD burning software, to produce Closed Captioning, will be over \$6,144. In addition, we would also have to pay or find a volunteer skillful enough to type each sermon and load the program, which would take roughly 4-5 hours to do, excluding post-editing, which takes an additional 6 hours. With these

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additional man-hours added, this will also make it very difficult to keep up with the program airing times and scheduled deadlines.

Impact on the Operation of the Program Provider

The cost for both KSCE and World Harvest Television is \$1,015 per episode (combined) or \$52,780 annually (52 x \$1,015). Closed Captioning would increase the per episode cost by \$300 bringing the cost of each program to \$1,315 per episode. These costs would prohibit the church from airing the program, seriously altering the church's ability to continue to minister to millions of faithful viewers.

Financial Resources of the Program Provider

The church is a 501 C-3 organization, (see attachment)
Funds would have to be diverted from other ministry areas.
Captioning assistance is not available from either television station.

Types of Operations of the Program Provider

Our church is a non-profit religious organization. Changing Lives in Changing Times is a media outreach ministry designed to effectively build lives, targeting spiritual and emotional growth in marriage, family and finances. This program has also served as a means of outreach for our military soldiers and their families.

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 costs of captioning would be excessively high and would have a significant impact on Petitioner's operation. The Petitioner's 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 below.

Respectfully submitted,



LYNDON L. MAYFIELD

Administrator

Christian Joy Center, El Paso, Texas

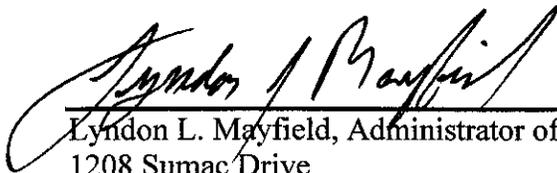
admin-mayfield@joycenter.org

GENERAL AFFIDAVIT

State of Texas
El Paso

BEFORE ME the undersigned Notary,

WILLIE C JENKINS JR, on
this 17th day of December 2007, personally appeared Lyndon L.
Mayfield known 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.



Lyndon L. Mayfield, Administrator of Christian Joy Center
1208 Sumac Drive
El Paso, Texas 79925

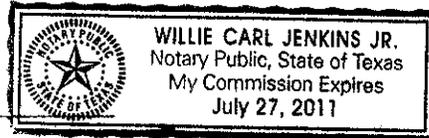
Subscribed and sworn to me before me, this 17th day of December
2007.



(Signature of Notary)

Willie C. Jenkins, Jr.

Typed name of Notary



NOTARY PUBLIC
My commission expires: 3/4 27 2011