

CGB-CC-0967

Received & Inspected

JAN 19 2010

FCC Mail Room

Fallah Productions, Inc.
Kirk Fallah
18728 Center Ave.
Homewood, IL. 60430
(708) 935-2861

Commission's Secretary, Office of the Secretary
Federal Communications Commission
Attn: CGB Room 3-B431
9300 East Hampton Drive
Capital Heights, MD. 20743

To Whom It May Concern,

I am Kirk Fallah, sole owner and sole operator of Fallah Productions, Inc., which produces a television show called Windy City Poker Championship (WCPC). At this time I would like to submit the enclosed petition for exemption to the "closed captions" requirements for my show.

Thank You.

Sincerely Yours,



1-13-2010

Kirk Fallah

Fallah Productions, Inc.

**Fallah Productions, Inc.
Kirk Fallah
18728 Center Ave.
Homewood, IL. 60430**

**Commissions Secretary, Office of the Secretary
Federal Communications Commission
Attn: CGB Room 3-B431
9300 East Hampton Drive
Capital Heights, MD. 20743**

Fallah Productions, Inc., which produces a television show called Windy City Poker Championship (here in referred to as **WCPC**) hereby, submit a petition for exemption to the "closed captions" requirements for our show.

I am requesting this exemption due to the fact it would cause my company and I severe financial burden for the type of shows produced. Also I strongly believe these shows are within the guidelines as listed under the exemptions law 79.1(f) section # 4 and # 8.

Undue Burden

WCPC is a Chicago based poker show that highlights charity poker events held in Chicago. 2009 was the first year that **WCPC** has produced any shows. Other than myself, my entire staff/production crew consists of students and recent graduates from Columbia College Chicago that I hire on an event by event basis to produce each program. **WCPC** has no sales department to generate revenue and minimum advertisement is raised to supplement the production budget.

So far each show produced has exceeded the available budget leaving no post-production budget for editing, writing, or graphic design. I have had to invest my own personal funds in order to be able to cover as much of the production budget as possible due to lack of sponsorship available for each program.

Each one-hour episode produced in High Definition (HD-Cam broadcast format), would cost anywhere from \$750.00 to \$1000.00 to have the program closed captioned for broadcast. This entire amount would have to be paid personally by me. The format for each of the 10 (ten) already produced programs of 2009 would have to be re-mastered for every broadcast in order to add closed captioning which again would have to be paid personally by me. This is due to minor changes in content and graphical information for each program on the screen so as to keep the program updated for broadcast and maintain program continuity.

KAF
1-13-10

Fallah Productions, Inc.

Under section 4 of 79.1(f)

The shows I produce are primarily visual and graphically oriented enough so that an average viewer could easily follow the content without sound. Throughout the show players hold-hands and bet amounts as well as their current chip standings are textually and graphically represented on screen at the appropriate times. These elements and information on the screen keep the viewer informed about all of the action during the program. The best example of how and why this is needed for the program would be viewers at local restaurants or bars who watch the program either with no sound or diminished sound due to the surrounding environments atmosphere are still able to keep up with the action just as if they were at home listening to the program.

Under section 8 of 79.1(f)

Windy City Poker Championship shows are produced locally in Chicago and fall within the category of non-news programming for entertainment and local public interest value only. The programs highlight local charities that are benefitting from each event. There is no value to repeat broadcasts other than covering the costs of the re-edit. Programs air on a purchased time slot or by a barter agreement where the time slot is given to WCPC in exchange for the ability for the network to place ads during the show.

To watch these programs you can go to "youtube.com" and keyword search: "*windy city poker championship*". Programs are also available on the website at www.windycitypokerchampionship.com

Fallah Productions, Inc.

KAF
1-13-10