

CGB-CC-0986

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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

February 22nd, 2010

To Whom It May Concern,

I am Kirk Fallah, sole owner and sole operator of Fallah Productions, Inc and at this time would like to submit the enclosed petition for exemption to the "closed captions" requirements for a show I produced in Orange Park, Florida.

Thank You.

Sincerely Yours,



Kirk Fallah

Fallah Productions, Inc.

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Kirk Fallah
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Homewood, IL. 60430**

February 22nd, 2010

**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., hereby, submits a petition for exemption to the “closed captions” requirements for a show we produced titled “*Jacksonville Greyhound Racing and Poker's First Annual Chad Brown No Limit Texas Hold 'Em Championship*” located in Orange Park, Florida.

I am requesting this exemption due to the fact it would cause my company and I additional financial burden for the type of show produced since the total production costs exceeded the available production budget. Also I strongly believe this show is within the guidelines as listed under the exemptions law 79.1(f) section # 4 and # 8.

Undue Burden

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. Fallah Productions does not have a sales department to generate revenue and since the show was located in another state I did not have the resources or access availability to acquire anymore than minimal advertisement to supplement the production budget. Our available budget covered travel, food, and hotel stay for crew members of the production

The show produced 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 this 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.

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)

The "*Jacksonville Greyhound Racing and Poker's First Annual Chad Brown No Limit Texas Hold 'Em Championship*" program falls within the category of non-news programming for entertainment and local public interest value only. There is no value to repeat broadcast other than covering the costs of the re-edit. The show will air on Bright House Sports Network, COX Cable – CST, and potentially Comcast SportsNet.

Fallah Productions, Inc.

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by a long horizontal line that tapers to the right.