

CGN-CC-1021

Emmanuel Global Network, USA

Received & Inspected

JUN 28 2010

FCC Mail Room

Monday, June 21, 2010

Via First Class U.S. Mail

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Petition for Undue Burden Exemption
from Closed Captioning Rules

Dear Ms. Dortch:

This letter is submitted pursuant to 47 C.F.R. §79.1(f) and requests an exemption on behalf of Emmanuel Global Network, USA, from the FCC's closed captioning rules based on undue burden. In accordance with 47 C.F.R. §79.1(f)(4), the original and two copies of this letter and all support are being provided.

Emmanuel Global Network, USA, is a donor supported non-profit organization under the laws of the state of Colorado. Since 2009, our sister organization, or Synagogue Church Of All Nations, has produced a weekly 30-minute video program for use in Lagos, Nigeria and the United States Standard for Life. Standard for Life is a program that features a series of sermons from T.B. Joshua, founder of SCOAN, headquartered in Nigeria. Standard for Life is produced overseas, and is broadcast to the U.S. public on LeSEA Broadcasting Network and owned and operated stations. Emmanuel Global Network, USA pays LeSEA Broadcasting \$3440 per week to air the show over its broadcast facilities.

Captioning the program would present an undue burden for several reasons. First, since we do not have the resources to caption the program ourselves, it would have to be sent to an outside source for captioning. Second, the added production cost for captioning would make production of the program unaffordable and the time for captioning would make meeting LeSEA Broadcasting air-date deadlines impossible. Finally, a captioning requirement would ultimately cause us to either terminate or severely limit production of the program, and cause us to lose viewers and supporters who would no longer be able to regularly view the program. We have discussed with the LeSEA Broadcasting station, KWHD-TV 53, Denver, about the possibility of their assisting us in captioning the program at no cost, but they have advised us that they do not have the necessary resources or staffing to perform captioning on our behalf.

Emmanuel Global Network, USA respectfully submits that the basis for its captioning exemption request based on undue burden is practically identical to the facts justifying undue burden exemptions in the Commission's 2006 Memorandum Opinion & Order, *In Re Anglers for Christ Ministries, Inc. & New Beginning Ministries Petitions for Exemption from Closed Captioning Requirements, CGB-CC-0005 and -0007, 21 FCC Rcd 10094 (September 12, 2006)*. In light of that precedent, and the facts set forth in this letter, we respectfully request that Emmanuel Global Network, USA be granted an undue burden exemption from the captioning requirements for Standard for Life.

In support of our request, we provide a copy of certain documents establishing Emmanuel Global Network, USA's non-profit status. In addition, as permitted by §1.16 of the Commission's rules, we are providing a Declaration Under Penalty of Perjury in support of the facts set forth in this request for exemption in lieu of the affidavit required by §79.1(f)(9). Should the Commission require additional information, please contact the undersigned individual.

Respectfully:

Emmanuel Global Network, USA

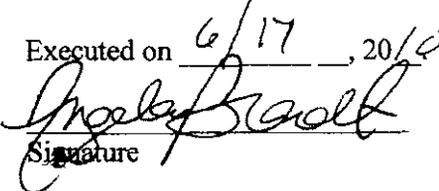
By: 
Printed Name: Angela Brandt
Title: CEO

**Declaration Under Penalty of Perjury of Angela Brandt
in support of Emmanuel Global Network, USA's Request for Undue
Burden Exemption from Closed Captioning Rules**

I, Angela Brandt, CEO of Emmanuel Global Network, USA, do hereby declare under penalty of perjury of the laws of the United States of America that the following statements are true and correct.

1. Emmanuel Global Network, USA is a donor supported non-profit organization organized under the laws of the state of California and a foreign entity registered in the state of Colorado.
2. Since 2009, Emmanuel Global Network, USA airs a 30-minute video program called Standard for Life, produced in Lagos, Nigeria. Standard for Life is a program that features a series of sermons by T.B. Joshua, founder of The Synagogue Church for All Nations, headquartered in Lagos, Nigeria. Standard for Life is a new ministry program produced overseas by Emmanuel Global Network staff and is broadcast to the public on the following LeSEA Broadcasting properties; KWHD TV-53, Denver, CO; KWHS TV-51, Colorado Springs, CO; WHME TV-46, South Bend, IN; WHMB TV-40, Indianapolis, IN; KWHD TV-47, Tulsa, OK; KWHE TV-14, Honolulu, HI; WHNO TV-20, New Orleans, LA and WHT "World Harvest Satellite". Emmanuel Global Network, USA pays LeSEA Broadcasting \$3,440 per week to air the show over its broadcast facilities.
3. Emmanuel Global Network, USA has discussed with LeSEA Broadcasting station, KWHD TV-53, Denver, CO the possibility of their assisting in captioning Standard for Life at no cost, but they have advised us that they do not have the necessary resources or staffing to perform captioning on our behalf.
4. Captioning Standard for Life would present an undue burden because we do not have the resources to caption the program ourselves, and it would have to be sent to an outside source for captioning.
5. The added production cost for captioning would make production of the program unaffordable and the time for captioning would make meeting LeSEA Broadcasting air-date deadlines impossible.
6. A captioning requirement for Standard for Life would ultimately cause Emmanuel Global Network, USA to either terminate or severely limit production of the program, and cause us to lose viewers and supporters who would no longer be able to regularly view the program.

Executed on 6/17, 2010


Signature