

CGB-CC-0137

Abundant Faith

CHRISTIAN CENTER
"Today's Ministry For The ENTIRE Family"

November 29, 2011

Case Identifier: CGB-CC-0137

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

Received & Inspected

DEC 3 - 2011

FCC Mail Room

**RE: REQUEST FOR EXEMPTION FROM
COMMISSION'S CLOSED CAPTIONING RULES**

Abundant Faith Ministry (AFM) is a fast growing, non-denominational community-based ministry serving Springfield and Sangamon County in Illinois. The ministry established a 30-minute local program, "Faith for Today," that is broadcast on WCFN television and Springfield's local cable channel, Access 4.

Please accept this petition for exemption from Section 79.1 of the commission's rules implementing Section 713 of the Communications Act of 1934. The rules are threatening the future of "Faith for Today" due to the overwhelming expense it would take to comply with such rules. Our program qualifies for exemption for the following reasons:

Part 79.1 - Section (D)

"Faith for Today is a locally produced and distributed non-news program with no repeat value. The program is of local public interest, is not a news program, and the technique of captioning is unavailable. The program is similar to a local talk-show format, distributed locally, and is completely unscripted. It is of local interest due to the continued religious events and issues we make available to the public. Finally, our program is distributed in the late night hours. "Faith for Today" airs at 6am ends at 6:30am on Saturday and Sunday.

Part 79.1 - Section (F)

Abundant Faith Ministry will be imposed with undue burden if it has to comply for the following reasons:

1. In order for all programs to include closed caption outsourcing for post-production would be required. Post-production would cost the ministry \$17,680 a year calculated at \$340 per 30-minute show for 52 weeks. This estimate was based on \$250 captioning fees, \$70 tape stock, and \$20 shipping and handling costs.



2525 Taylor Avenue • Springfield, Illinois 62703
217.585.4000 - Office • 217.585.8922 - Fax
www.abundantfaith.org

Abundant Faith

CHRISTIAN CENTER

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2. Volunteers with minimal equipment strictly produce our broadcast "Faith for Today". We only pay the local station \$150.00 to air each show. If we had to add closed captioning to the equation it would come to over two times the cost.
3. The ministry has already stretched its resources to allocated funds for television programming. If we are asked to spend more than twice the amount of monies to produce "Faith for Today," we will be forced to terminate a valuable resource to the community.

We have requested that the station we broadcast on help us with the closed captioning portion. We were told they do not provide this service for their clients.

Abundant Faith Ministry also considered purchasing software and equipment that would enable us to do closed captioning in house. The proper closed captioning equipment and software costs \$7,500 plus \$500 a year for auto time-stamping the transcribed script plus transcribing costs of \$100 per episode. Simply, we do not have the funds for this either.

We respectfully request that Abundant Faith Ministry be exempted from the closed captioning-requirement for the aforementioned reasons. Should you have any questions or concerns please call me at 217.585.400.

Sincerely,



Ron Rhone
Media Team Leader



GENERAL AFFIDAVIT

Received & Inspected
DEC 3-2011
FCC MAIL ROOM

STATE OF ILLINOIS

COUNTY OF SANGAMON

PERSONALLY came and appeared before me, the undersigned Notary, the within named Ron Rhone, who is a resident of Sangamon County, State of Illinois, and makes this his statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his knowledge:

I Ron Rhone serve as the Media Ministry Leader of Abundant Faith Ministry; by signature affixed to this document, do here by make the following statement of fact affirm:

1. In order for all programs to include closed caption outsourcing for post-production would be required. Post-production would cost the ministry \$17,680 a year calculated at \$340 per 30-minute show for 52 weeks. This estimate was based on \$250 captioning fees, \$70 tape stock, and \$20 shipping and handling costs.
2. Volunteers with minimal equipment strictly produce our broadcast "Faith for Today". We only pay the local station \$150.00 to air each show. If we had to add closed captioning to the equation it would come to over two times the cost.
3. Closed captioning equipment and software costs \$7,500 plus \$500 a year for auto time-stamping the transcribed script plus transcribing costs of \$100 per episode.
4. All other costs involved in the production of "Faith for Today" are donated by volunteers.

DATED this the 30th day of November, 2011

Ron Rhone
Signature of Affiant

SWORN to subscribed before me, this 30th day of November, 2011

Atlene Washington
NOTARY PUBLIC

My Commission Expires:

August 29, 2015

