

Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
9300 East Hampton Drive
Capitol Heights, MD 20743

Received & Inspected
JAN 12 2012
FCC Mall Room

Petition for Exemption from Closed Captioning Requirements

Introduction

The Diocese of Lake Charles in Louisiana is a canonically established division of the Roman Catholic Church made up of the five civil parishes (counties) of Southwest Louisiana. The Diocese was formed in 1980 from territory previously part of the Diocese of Lafayette in Louisiana. The mission of the Diocese of Lake Charles, through its Catholic faithful, gathered with its bishop, is to carry on the work of Christ under the guidance of the Holy Spirit by promoting personal holiness for ourselves and increasing the flock under His care. To fulfill the mission the following goals have been established: 1. To make parishes vital centers of worship, reconciliation, and Christian community. 2. To teach Catholic beliefs, traditions, and values in the context of deepening spirituality and life-long religious education and formation. 3. To share our faith with all God's people. 4. To call forth men and women to develop leadership for ministry. 5. To heal human injustice, to preserve human rights, and to enable the poor to uplift themselves in collaboration with all people of good will. 6. To foster the understanding and practice of responsible stewardship of our human and material resources. The Catholic population of the Diocese is about 72,000 out of a general population of about 225,000.

The *Glad Tidings* program provides a spiritual dialogue on the Church's Gospel reading of the day, between its Bishop (The Most Reverend Glen John Provost) and, on an alternating basis, one of three of the most recently ordained priests of the Diocese (Rev. Scott Conner, Rev. John Huckaby, and Rev. Jeffrey Starkovich). During the Bishop's summer hiatus, priests of the Diocese give guest homilies. The program also has half-hour interview pieces entitled Lead Kindly Light, From the Pew, Exploring Theology, Catholic Life Today, and Priestly Journeys providing information of religious and theological interest to the viewers.

Glad Tidings is an hour-long program airing each Sunday, with some exceptions due to pre-emptions for NBC network programming, on KPLC-TV, Channel 7 (Lake Charles, Louisiana) at 6 a.m. (Central Time). The program is taped and

edited for air by Kirby Raymond, a local freelance producer, who has been contracted for that purpose since the formation of the Diocese.

For the reasons set forth below, The Diocese of Lake Charles hereby requests an exemption from the closed captioning rules for *Glad Tidings* do to the economic burden it would place on the production and airing of the program, pursuant to § 79.1(f) of the Commissions rules.

Nature and Cost of Closed Captions

Information has been gathered from several companies who offer closed captioning for video productions. Estimates of the cost to add closed captions to each hour-long program vary widely. If time were of no object, though it certainly is due to the constraints we are under in production, we could have the process completed for between \$230 and \$460. Any of these would require at least a three-day turnaround. This would be most problematic in that the current programming is not completed until Wednesday evening for submittal to the commercial station by its noon Thursday deadline. The final segment of each program has historically not been taped until the Tuesday before the Sunday airdate. This procedure would add, without including shipping charges, between \$12,000 and \$23,900 to the budget.

Another company has offered a 24-hour expedited turnaround of the programming but at a cost of between \$570 and \$650 per program – about \$29,640 to \$33,800 additional annually.

Impact on the Operation of the Program Provider

The cost of production (taping for each *Glad Tidings* program during 2011 averaged \$1,518.67 or a total of \$78,970.84. This includes the taping of each segment and the cost of editing those segments into the hour-long show.

The addition of the approximate cost of closed captioning, as delineated above, would increase the weekly figure for production by 16 to 42 percent.

We currently pay the commercial station \$850 per week (\$44,200 annually) for the hour time slot and anticipate an increase to \$900 (\$44,600 annually) in mid-2012.

Financial Resources of the Program Provider

The Diocese of Lake Charles is a non-profit 501(c)3 organization through its affiliation with the United States Conference of Catholic Bishops and its incorporation as such in the state of Louisiana. The Diocese receives funding through the contributions of the Catholic faithful of Southwest Louisiana, via an annual Bishop's Services Appeal, diocesan assessments of the 38 churches in the Diocese, grants from Catholic institutions, special programs and other revenues. Direct contributions from the public are not sought for funding of the television ministry and it is entirely subsidized through the general fund of the Diocese. With the current economy in Southwest Louisiana and other programs and ministries deemed by the Diocesan Bishop as more important to fund, it has not been feasible to seek individual funding for the television programming. With the additional cost associated with the closed captioning of *Glad Tidings*, the Diocese might be forced to severely curtail the programming or discontinue this more than 30-year old ministry.

Type of Operations of the Program Provider

The Diocese of Lake Charles a non-profit religious institution with 38 church parishes located throughout the approximate 5,000 square mile area of Southwest Louisiana in the parishes (counties) of Allen, Beauregard, Calcasieu Cameron, and Jefferson Davis. Departmental entities operated through the auspices of the Diocese include eight Catholic schools, Catholic Charities of Southwest Louisiana, Tabor Retreat House at Saint Charles Center, the Seafarers Center at the Port of Lake Charles, Christian Formation and Pastoral Services.

Other Factors

Petitioner believes that the local, non-news exemption to the closed captioning rules also applies to *Glad Tidings*. As noted above, the program is produced and distributed locally, and the messages of the Diocese of Lake Charles are of primarily local interest. The episodes are not news, they do not have repeat value, notwithstanding the applicability of the exemption, the petition is filed with an abundance of caution and for the purpose of establishing certainty.

Conclusion

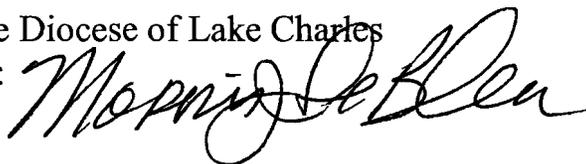
As shown by this petition and its attachments, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would economically burdensome. The costs of captioning would be excessively high and would have a significant impact on Petitioners operations. The Petitioner's type of operation 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.

Respectfully submitted,

The Diocese of Lake Charles

By:

A handwritten signature in black ink, appearing to read "Morris J. LeBleu". The signature is written in a cursive style with a large, stylized initial "M".

Morris J. LeBleu, Director of Communications
Diocese of Lake Charles
411 Iris Street
Lake Charles, LA 70601
337-439-7400, Ext. 304
FAX: 337-439-7413

Dated: January 13, 2012

Attachment No. 1

I, Morris J. LeBleu, am Director of Communications for the Diocese of Lake Charles in Louisiana. I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of the Diocese of Lake Charles in this matter, and upon information and belief, believe the statements regarding our organization and the *Glad Tidings* television program to be true and correct.



Morris J. LeBleu
Director of Communications
Diocese of Lake Charles

January 11, 2012

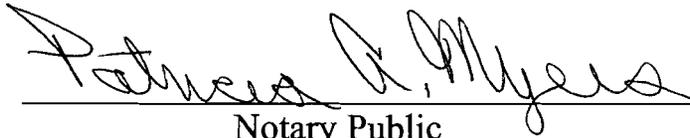
Date

State of Louisiana

Parish of Calcasieu

Subscribed and sworn to before me this 11th day of January, 2012

by Morris J. LeBleu.



Notary Public

My commission expires

at death



Patricia A. Myers
Notary ID# 49231
State of Louisiana
Parish of Calcasieu
My Commission is for Life

Attachment No. 2

Glad Tidings Programming Schedule for 2012

Each Sunday in 2012 from 6 a.m. to 7 a.m. (Central Time) on KPLC-TV, Channel 7, Lake Charles, Louisiana.

Only exceptions being NBC network preemptions, which are, at this time, unknown. Currently the airing of the Summer Olympic Games from London might be cause for the network to force a pre-emption of our programming.

Attachment No. 3

Financial documentation

Internal Revenue Service
P.O. Box 2508
Cincinnati, OH 45201

Department of the Treasury

Date: July 12, 2011

Person to Contact:

Roger Meyer

Toll Free Telephone Number:

877-829-5500

Employer Identification Number:

53-0196617

Group Exemption Number:

0928

United States Conference of Catholic
Bishops
3211 4th Street, NE
Washington, DC 20017-1194

Dear Sir/Madam:

This responds to your July 1, 2011, request for information regarding the status of your group tax exemption.

Our records indicate that you were issued a determination letter in March 1946, that you are currently exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code, and are not a private foundation within the meaning of section 509(a) of the Code because you are described in sections 509(a)(1) and 170(b)(1)(A)(i).

With your request, you provided a copy of the *Official Catholic Directory for 2011*, which includes the names and addresses of the agencies and instrumentalities and the educational, charitable, and religious institutions operated by the Roman Catholic Church in the United States, its territories, and possessions that are subordinate organizations under your group tax exemption. Your request indicated that each subordinate organization is a non-profit organization, that no part of the net earnings thereof inures to the benefit of any individual, and that no substantial part of their activities is for promotion of legislation. You have further represented that none of your subordinate organizations is a private foundation under section 509(a), although all subordinates do not all share the same sub-classification under section 509(a). Based on your representations, the subordinate organizations in the *Official Catholic Directory for 2011* are recognized as exempt under section 501(c)(3) of the Code under GEN 0928.

Donors may deduct contributions to you and your subordinate organizations as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to them or for their use are deductible for federal estate and gifts tax purposes if they meet the applicable provisions of section 2055, 2106, and 2522 of the Code.

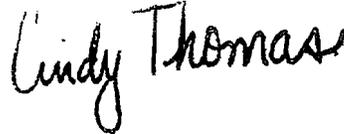
Subordinate organizations under a group exemption do not receive individual exemption letters. Most subordinate organizations are not separately listed in Publication 78 or the EO Business Master File. Donors may verify that a subordinate organization is included

in your group exemption by consulting the *Official Catholic Directory*, the official subordinate listing approved by you, or by contacting you directly. IRS does not verify the inclusion of subordinate organizations under your group exemption. See IRS Publication 4573, *Group Exemption*, for additional information about group exemptions.

Each subordinate organization covered in a group exemption should have its own EIN. Each subordinate organization must use its own EIN, not the EIN of the central organization, in all filings with IRS.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,

A handwritten signature in black ink that reads "Cindy Thomas". The signature is written in a cursive, slightly slanted style.

Cindy Thomas
Manager, Exempt Organizations
Determinations

Diocese of Lake Charles
Detail General Ledger
 Period: 7/1/2010 to 6/30/2011

Account Number	Account Description					
Transaction Date	Source Reference	Transaction Reference	Debits	Credits	Net Change	Balance
5820-508	TELEVISION					
6/30/2011	VAP-4938	433829-12/KPLC-TV	2,500.00		115,429.19	115,429.19
5820-508 Sub Totals:			<u>\$115,429.19</u>	<u>\$0.00</u>	<u>\$115,429.19</u>	<u>\$115,429.19</u>
Net Loss:			<u>\$0.00</u>	<u>\$115,429.19</u>	<u>\$115,429.19</u>	<u>\$115,429.19</u>
Grand Totals:			<u>\$115,429.19</u>	<u>\$0.00</u>	<u>\$115,429.19</u>	<u>\$115,429.19</u>

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7/1/2010		Beginning Balance				0.00
7/15/2010	VAP-142	071510/C KIRBY RAYMOND	2,732.62		2,732.62	2,732.62
7/31/2010	VAP-398	433829-1/KPLC-TV	2,325.00		5,057.62	5,057.62
7/31/2010	VAP-426	073010/C KIRBY RAYMOND	3,036.37		8,093.99	8,093.99
8/18/2010	VAP-613	081610/C KIRBY RAYMOND	2,738.25		10,832.24	10,832.24
8/25/2010	VAP-692	08302010/C KIRBY RAYMOND	3,376.12		14,208.36	14,208.36
9/9/2010	VAP-852	433829-2/KPLC-TV	3,875.00		18,083.36	18,083.36
9/9/2010	VAP-878	090110/C KIRBY RAYMOND	121.50		18,204.86	18,204.86
9/15/2010	VAP-958	091410/C KIRBY RAYMOND	2,790.00		20,994.86	20,994.86
9/21/2010	VAP-1000	8765/CHASE CARD SERVICES	361.50		21,356.36	21,356.36
9/29/2010	VAP-1172	092910/C KIRBY RAYMOND	4,232.25		25,588.61	25,588.61
9/30/2010	VAP-1197	433829-3/KPLC-TV	3,100.00		28,688.61	28,688.61
10/14/2010	VAP-1368	101310/C KIRBY RAYMOND	2,822.62		31,511.23	31,511.23
10/27/2010	VAP-1560	103110/C KIRBY RAYMOND	3,727.12		35,238.35	35,238.35
11/9/2010	VAP-1721	433829-4/KPLC-TV	3,100.00		38,338.35	38,338.35
11/17/2010	VAP-1846	111510/C KIRBY RAYMOND	2,326.50		40,664.85	40,664.85
11/30/2010	VAP-2042	113010/C KIRBY RAYMOND	3,305.25		43,970.10	43,970.10
12/9/2010	VAP-2115	433829-5/KPLC-TV	3,100.00		47,070.10	47,070.10
12/15/2010	VAP-2266	121510/C KIRBY RAYMOND	2,561.62		49,631.72	49,631.72
1/11/2011	VAP-2488	010411/C KIRBY RAYMOND	2,823.75		52,455.47	52,455.47
1/18/2011	VAP-2560	011511/C KIRBY RAYMOND	2,305.12		54,760.59	54,760.59
1/19/2011	VAP-2591	433829-6/KPLC-TV	5,500.00		60,260.59	60,260.59
1/26/2011	VAP-2756	13111/C KIRBY RAYMOND	3,548.25		63,808.84	63,808.84
2/15/2011	VAP-2982	433829-7/KPLC-TV	3,875.00		67,683.84	67,683.84
2/21/2011	VAP-3124	021511/C KIRBY RAYMOND	3,272.62		70,956.46	70,956.46
2/28/2011	VAP-3253	022811/C KIRBY RAYMOND	2,216.25		73,172.71	73,172.71
3/4/2011	VAP-3317	433829-8/KPLC-TV	3,100.00		76,272.71	76,272.71
3/21/2011	VAP-3442	031611/C KIRBY RAYMOND	3,787.87		80,060.58	80,060.58
3/31/2011	VAP-3660	033111/C KIRBY RAYMOND	2,359.12		82,419.70	82,419.70
4/11/2011	VAP-3782	433829-9/KPLC-TV	3,100.00		85,519.70	85,519.70
4/18/2011	VAP-3913	041511/C KIRBY RAYMOND	2,800.12		88,319.82	88,319.82
4/29/2011	VAP-4014	043011/C KIRBY RAYMOND	3,586.50		91,906.32	91,906.32
5/16/2011	VAP-4151	433829-10/KPLC-TV	3,100.00		95,006.32	95,006.32
5/16/2011	VAP-4208	051511/C KIRBY RAYMOND	2,305.12		97,311.44	97,311.44
5/31/2011	VAP-4478	053111/C KIRBY RAYMOND	5,278.50		102,589.94	102,589.94
6/14/2011	VAP-4574	433829-11/KPLC-TV	3,875.00		106,464.94	106,464.94
6/21/2011	VAP-4712	061511/C KIRBY RAYMOND	3,255.75		109,720.69	109,720.69
6/30/2011	VAP-4861	063011/C KIRBY RAYMOND	3,208.50		112,929.19	112,929.19

Diocese of Lake Charles
Detail General Ledger
 Period: 7/1/2011 to 6/30/2012

Account Number	Account Description	Transaction Reference	Debits	Credits	Net Change	Balance
Transaction Date	Source Reference	Transaction Reference				
5820-508	TELEVISION					
7/1/2011		Beginning Balance				0.00
7/18/2011	VAP-88	071511/C KIRBY RAYMOND	2,723.62		2,723.62	2,723.62
7/31/2011	VAP-277	072711/C KIRBY RAYMOND	1,919.25		4,642.87	4,642.87
8/15/2011	VAP-424	617958-1/KPLC-TV	3,400.00		8,042.87	8,042.87
8/15/2011	VAP-453	081511/C KIRBY RAYMOND	4,501.12		12,543.99	12,543.99
8/31/2011	VAP-691	083111/C KIRBY RAYMOND	4,687.87		17,231.86	17,231.86
9/14/2011	VAP-794	617958-2/KPLC-TV	3,400.00		20,631.86	20,631.86
9/20/2011	VAP-944	091511/C KIRBY RAYMOND	4,335.75		24,967.61	24,967.61
9/30/2011	VAP-1079	093011/C KIRBY RAYMOND	1,905.75		26,873.36	26,873.36
10/11/2011	VAP-1167	617958-3/KPLC-TV	3,400.00		30,273.36	30,273.36
10/17/2011	VAP-1280	101511/C KIRBY RAYMOND	4,155.75		34,429.11	34,429.11
10/28/2011	VAP-1398	10010252011/ADLINK LLC	2,110.00		36,539.11	36,539.11
10/28/2011	VAP-1437	103111/C KIRBY RAYMOND	2,486.25		39,025.36	39,025.36
11/7/2011	VAP-1539	617958-4/KPLC-TV	4,250.00		43,275.36	43,275.36
11/21/2011	VAP-1756	111511/C KIRBY RAYMOND	5,010.75		48,286.11	48,286.11
12/13/2011	VGLCHKS-56868	C KIRBY RAYMOND - 7354	3,101.62		51,387.73	51,387.73
12/13/2011	VGLCHKS-56894	KPLC-TV - 4812	3,400.00		54,787.73	54,787.73
12/13/2011	VGLCHKS-56927	VIRTUE MEDIA - 9439	988.54		55,776.27	55,776.27
12/22/2011	VGLCHKS-56934	C KIRBY RAYMOND - 7354	2,625.75		58,402.02	58,402.02
5820-508 Sub Totals:			\$58,402.02	\$0.00	\$58,402.02	\$58,402.02
Net Loss:			\$0.00	\$58,402.02	\$58,402.02	\$58,402.02
Grand Totals:			\$58,402.02	\$0.00	\$58,402.02	\$58,402.02

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Net Loss:			<u>\$0.00</u>	<u>\$115,429.19</u>	<u>\$115,429.19</u>	<u>\$115,429.19</u>
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		2/21/2011	VAP-3124	021511/C KIRBY RAYMOND	3,272.62		70,956.46	70,956.46
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		3/4/2011	VAP-3317	433829-8/KPLC-TV	3,100.00		76,272.71	76,272.71
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		3/31/2011	VAP-3660	033111/C KIRBY RAYMOND	2,359.12		82,419.70	82,419.70
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		5/16/2011	VAP-4208	051511/C KIRBY RAYMOND	2,305.12		97,311.44	97,311.44
		5/31/2011	VAP-4478	053111/C KIRBY RAYMOND	5,278.50		102,589.94	102,589.94
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7/18/2011	VAP-88	071511/C KIRBY RAYMOND	2,723.62		2,723.62	2,723.62
7/31/2011	VAP-277	072711/C KIRBY RAYMOND	1,919.25		4,642.87	4,642.87
8/15/2011	VAP-424	617958-1/KPLC-TV	3,400.00		8,042.87	8,042.87
8/15/2011	VAP-453	081511/C KIRBY RAYMOND	4,501.12		12,543.99	12,543.99
8/31/2011	VAP-691	083111/C KIRBY RAYMOND	4,687.87		17,231.86	17,231.86
9/14/2011	VAP-794	617958-2/KPLC-TV	3,400.00		20,631.86	20,631.86
9/20/2011	VAP-944	091511/C KIRBY RAYMOND	4,335.75		24,967.61	24,967.61
9/30/2011	VAP-1079	093011/C KIRBY RAYMOND	1,905.75		26,873.36	26,873.36
10/11/2011	VAP-1167	617958-3/KPLC-TV	3,400.00		30,273.36	30,273.36
10/17/2011	VAP-1280	101511/C KIRBY RAYMOND	4,155.75		34,429.11	34,429.11
10/28/2011	VAP-1398	10010252011/ADLINK LLC	2,110.00		36,539.11	36,539.11
10/28/2011	VAP-1437	103111/C KIRBY RAYMOND	2,486.25		39,025.36	39,025.36
11/7/2011	VAP-1539	617958-4/KPLC-TV	4,250.00		43,275.36	43,275.36
11/21/2011	VAP-1756	111511/C KIRBY RAYMOND	5,010.75		48,286.11	48,286.11
12/13/2011	VGLCHKS-56868	C KIRBY RAYMOND - 7354	3,101.62		51,387.73	51,387.73
12/13/2011	VGLCHKS-56894	KPLC-TV - 4812	3,400.00		54,787.73	54,787.73
12/13/2011	VGLCHKS-56927	VIRTUE MEDIA - 9439	988.54		55,776.27	55,776.27
12/22/2011	VGLCHKS-56934	C KIRBY RAYMOND - 7354	2,625.75		58,402.02	58,402.02
5820-508 Sub Totals:			\$58,402.02	\$0.00	\$58,402.02	\$58,402.02
Net Loss:			\$0.00	\$58,402.02	\$58,402.02	\$58,402.02
Grand Totals:			\$58,402.02	\$0.00	\$58,402.02	\$58,402.02

**Internal Revenue Service
P.O. Box 2508
Cincinnati, OH 45201**

Department of the Treasury

Date: July 12, 2011

Person to Contact:

Roger Meyer

Toll Free Telephone Number:

877-829-5500

Employer Identification Number:

53-0196617

Group Exemption Number:

0928

United States Conference of Catholic
Bishops
3211 4th Street, NE
Washington, DC 20017-1194

Dear Sir/Madam:

This responds to your July 1, 2011, request for information regarding the status of your group tax exemption.

Our records indicate that you were issued a determination letter in March 1946, that you are currently exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code, and are not a private foundation within the meaning of section 509(a) of the Code because you are described in sections 509(a)(1) and 170(b)(1)(A)(i).

With your request, you provided a copy of the *Official Catholic Directory for 2011*, which includes the names and addresses of the agencies and instrumentalities and the educational, charitable, and religious institutions operated by the Roman Catholic Church in the United States, its territories, and possessions that are subordinate organizations under your group tax exemption. Your request indicated that each subordinate organization is a non-profit organization, that no part of the net earnings thereof inures to the benefit of any individual, and that no substantial part of their activities is for promotion of legislation. You have further represented that none of your subordinate organizations is a private foundation under section 509(a), although all subordinates do not all share the same sub-classification under section 509(a). Based on your representations, the subordinate organizations in the *Official Catholic Directory for 2011* are recognized as exempt under section 501(c)(3) of the Code under GEN 0928.

Donors may deduct contributions to you and your subordinate organizations as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to them or for their use are deductible for federal estate and gifts tax purposes if they meet the applicable provisions of section 2055, 2106, and 2522 of the Code.

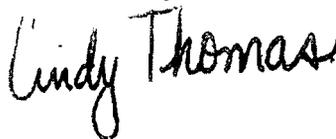
Subordinate organizations under a group exemption do not receive individual exemption letters. Most subordinate organizations are not separately listed in Publication 78 or the EO Business Master File. Donors may verify that a subordinate organization is included

in your group exemption by consulting the *Official Catholic Directory*, the official subordinate listing approved by you, or by contacting you directly. IRS does not verify the inclusion of subordinate organizations under your group exemption. See IRS Publication 4573, *Group Exemption*, for additional information about group exemptions.

Each subordinate organization covered in a group exemption should have its own EIN. Each subordinate organization must use its own EIN, not the EIN of the central organization, in all filings with IRS.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,

A handwritten signature in black ink that reads "Cindy Thomas". The signature is written in a cursive style with a large, looped initial "C".

Cindy Thomas
Manager, Exempt Organizations
Determinations