

CGB-CC-0978

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

Received & Inspected
JAN 18 2012
FCC Mail Room

January 17, 2012

Re: Petition for Undue Burden Exemption from Closed Captioning Rules

AFFADAVIT

To Whom It May Concern:

All the information in the correspondence relating to this Petition for Undue Burden Exemption from Close Captioning Rules and supporting documentation from New Covenant Christian Center in Kokomo, Indiana are both true and accurate.

Respectfully:

New Covenant Christian Center Church

By: Joyce Burgei

Printed Name: Joyce Burgei

Title: Vice President

Office of the Secretary

Federal Communications Commission

Disability Rights Office

Room 3-B431

9300 East Hampton Drive

Capitol Heights, MD 20743

January 17, 2012

Re: Petition for Undue Burden Exemption from Closed Captioning Rules

To Whom It May Concern:

This letter requests an exemption on behalf of New Covenant Christian Center Church in Kokomo, Indiana from the FCC's closed captioning rules based on undue burden. The original and two copies of this letter and all supporting documentation are being provided.

New Covenant Christian Center Church is a donor supported non-profit organization under the laws of the state of Indiana. Since 2005, we have produced a weekly 30-minute television program. The program teaches and inspires viewers how to develop their relationship with God and is produced locally by New Covenant Christian Center Church staff. It is broadcast to the public on WHMB-TV throughout Central Indiana. New Covenant Christian Center Church pays WHMB-TV \$500.00 per week to air the show over its broadcast facilities.

Captioning the program would present an undue burden for several reasons:

1. We do not have the financial resources to caption the program ourselves. Our research has determined it would cost \$5,000-8,000 to purchase the necessary equipment and the church is unable to take on that cost at this time.

2. Being a small church of less than 150, production of the program is done by a few volunteers and the additional expertise and manpower to caption each program is not available.
3. We've also explored closed captioning services. This would cost an additional \$250 per week or \$13,000 per year. The added cost for captioning would make production of the program unaffordable and the time for captioning would make meeting WHMB-TV's air date deadlines impossible.
4. WHMB-TV does not provide closed captioning and has said it is unlikely to do so in the foreseeable future because of the additional time and staff that would be required.
5. As a church, it was reported that we had previously submitted a letter of exemption in 2009 (estimated) without response. Because there was no response, whether by error in filing or misfiling, we have proceeded as though exempt and have therefore not attempted to solicit sponsorships to pay for the cost of closed captioning.

Providing closed captioning would cause us to terminate or severely limit production of the program and cause us to lose viewers who would no longer be able to regularly view the program.

While New Covenant Christian Center Church recognizes the importance closed captioning can have, based on the above facts set forth in this letter, we respectfully request that New Covenant Christian Center Church be granted an undue burden exemption from the captioning requirements.

Respectfully:

New Covenant Christian Center Church

By:

Joyce Burgei

Printed Name:

Joyce Burgei

Title:

Vice President

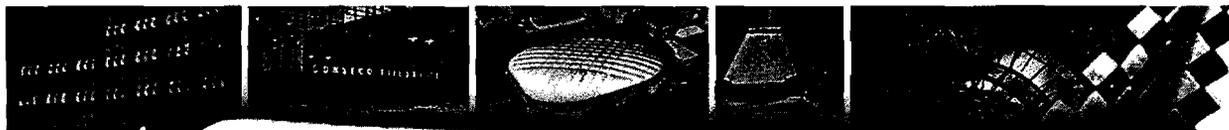
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01/17/12

Accrual Basis

New Covenant Christian Center
Profit & Loss
January through December 2011

	<u>Jan - Dec 11</u>
Income	
NCCC DEPOSIT	328,977.00
Total Income	<u>328,977.00</u>
Expense	
ADVERTISING	442.17
AIRLINE	561.40
AUTO EXPENSE	2,858.41
AUTO GAS & FUEL	1,657.48
BAND EXPENSE	787.97
BENEVOLENCE	6,048.00
CHILDRENS MINISTRY	931.37
COKE MACHINE	56.20
CONFERENCE EXPENSES	500.00
CONTRIBUTIONS & GIFTS	7,865.00
CREDIT CARD CHARGES	956.89
ENTERTAINMENT	2,235.94
FLORAL	164.34
FUNDRAISERS	166.26
HOUSING ALLOWANCE	34,000.00
INSURANCE CHURCH	5,379.00
MAINTENANCE BUILDING	1,498.34
MAINTENANCE GROUNDS	3,531.73
MEDICAL & DENTAL	36,221.93
MINISTERS SALARY	51,825.53
MISCELLANEOUS	3,780.68
OFFICE EXPENSE	3,394.34
OFFICE SALARY	41,507.18
OUTREACH	859.99
PAYROLL TAXES	24,027.03
POSTAGE	401.75
PRINTING	1,562.41
REIMBURSEMENTS	4,245.46
RENTALS	4,620.00
Retirement	10,000.00
STATE WITHHOLDING TAX	3,458.00
TAPES & BOOKS	841.11
TELEPHONE CHURCH	11,720.58
TELEVISION	23,599.44
TRASH REMOVAL	464.10
UTILITIES CHURCH	9,748.10
Web Site	98.91
Total Expense	<u>302,017.04</u>
Net Income	<u><u>26,959.96</u></u>



Joel Burgei
Producer
New Covenant CC
2298 E. Markland Ave.
Kokomo, IN 46901

January 17, 2012

Joel,

This letter is in response to your request for LeSEA Broadcasting to research the process and cost associated with closed captioning your television program that currently airs on WHMB-TV.

There are two ways to approach this issue:

- Purchase the captioning software/hardware and do the closed captioning yourself. Research by both the WHMB-TV production and engineering staffs has discovered the cost of this equipment will be in the \$5,000-8,000 range. The CC process involves multiple steps. First, the program must be transcribed word-for-word into an electronic document. Second, the script is entered in the CC software. Third, the software drops the script onto a timeline of the program. Fourth, the program can then be outputted with the embedded CC. In our experience, we've noted that it takes 4-6 hours to CC a 30-minute program such as yours.
- Outsource the closed captioning to an outside provider. Again, we've researched this solution and have discovered the cost to be approximately \$250 per program.

WHMB-TV does not currently offer in-house closed captioning services. Because closed captioning is such a labor-intensive process, we would have to hire additional staff to perform this task and that is not economically feasible at this time.

I hope this information answers your questions about the closed captioning process and the associated costs. Please don't hesitate to contact me with any further questions.

Sincerely,

Cathy Clossin
WHMB-TV