



CGB-CC-0743

gracebaptist
CHURCH

7171 Oak Ridge Highway Knoxville, Tennessee 37931 865-691-8886 www.gracebc.org

Received & Inspected

JAN 19 2012

FCC Mail Room

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street, SW
Washington, DC

January 6, 2012

Subject: Petition for Exemption from Closed Caption Requirements

Pursuant to § 47 CFR 79.1(f), Grace Baptist Church in Knox County, Tennessee ("petitioner") hereby petitions the Federal Communications Commission for an exemption from the rules implementing closed caption on the grounds of undue financial burden.

Background of Petitioner and Program Overview

Grace Baptist Church was organized and established in Knox County in December 1916 to provide a place for the community to worship God and study the Bible in the Baptist faith. In 1999 as part of its community outreach efforts petitioner established a television program, *The Miracle of Grace*. This one hour program provides worship and Bible study opportunities for those who are unable to attend congregational worship each Sunday morning at the petitioner's location. It also provides an opportunity for unchurched people in the surrounding community to learn about Bible teaching and witness the worship experience from the privacy of their own home. The television program is produced in-house with a large staff of volunteers and a small (3) in-house media staff.

For the reasons set forth below, Grace Baptist church of Knox County, hereby request an undue burden exemption from the closed captioning rules for the *Miracle of Grace* television program pursuant to § 47 CFR 79.1(f).

Financial Impact on the Program Provider

Petitioner has made inquiries into the cost of adding closed captioning to our television program. The total cost of adding closed captioning service at \$85 per hour accumulates to \$4,420 for this one hour program per year. Considering the financial resources of our organization is already strained due to the poor economic condition. It would put our television programming in jeopardy of being suspended or eliminated.

Financial Resources of the Program Provider

Petitioner is a tax-exempt non-profit corporation. The only source of income is from donation from its members. All production costs are borne by petitioner from the donations of its members. Petitioner has no other source of significant revenue. In addition to the television program, petitioner operates numerous other activities for the benefit of the local community. The needs of the community are



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many and the donations of the members do not meet all the needs. Consequently, petitioner cannot fund every identified worthy activity.

Conclusion

As shown by this petition and its attachments, the commission should grant a waiver of the closed captioning requirements in this cause due to it being economically burdensome to the petitioner. The petitioner's type of operations and financial resources are significantly 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.

If any additional information is required please contact me at the address listed below.

Respectfully submitted,

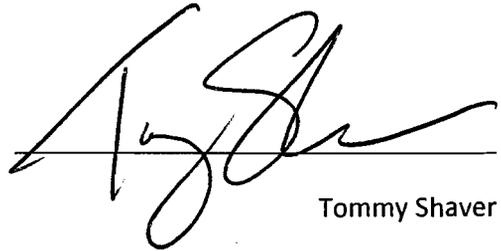
Tommy Shaver
Director of Media Ministries
7171 Oak Ridge Highway
Knoxville, TN 37931
865.691.8886



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AFFIDAVIT

I, Tommy Shaver, being first duly sworn, verify under oath that I am the Director of Media Ministries at Grace Baptist Church of Knox County, Tennessee and reviewed and, in conjunction with other staff members at Grace Baptist Church, prepared the material in the attached letter and swear that it is true and correct to the best of my knowledge and belief.


Tommy Shaver

Subscribed and sworn to before me the undersigned notary public on this the 10th day of January, 2012.

 Susan K. Eller
Notary Public

My commission expires
on 3/8/2015



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SFOSTER@WTNZFOX43.COM

1/9/12

Tommy,

Please be advised that the cost for providing Closed Captioning services is \$85 per hour.
Please let me know if you have additional questions.

Thanks!

Sara Foster
Sales Manager
WTNZ