

First United Methodist Church

903 East Fourth Street
Panama City, Florida 32401

Office 850-763-6537 or Fax 850-785-1421
www.fumc-pc.org

January 16, 2012

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

Received & Inspected

JAN 19 2012

FCC Mail Room

Re: Petition for exemption from the closed captioning rules

First United Methodist Church is hereby petitioning an exemption from the closed caption requirements for the program "Ten O'clock Worship Service". Closed captioning would result in a significant difficulty and expense to the church. Our sole video programming distributor, WJHG-TV, currently has the capability of this service at a yearly cost of \$16,000.00. We have also obtained numerous quotes from other individual companies that provide this service. The quotes are from \$11,960 - \$23,400.00 per year, plus the set-up fees which are from \$1000.00 - \$1600.00. This would be in addition to our existing yearly cost of \$35,100.00 airtime fee and the salaries of \$18,200.00 .

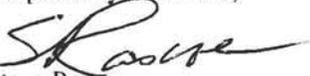
Due to decreasing sponsorship from our ageing congregation, this increase would be an undue financial burden and would surely cause us to lose our TV broadcast of 43 years. We are one of the longest running church broadcasts in the country. Donations towards the program do not cover all operating expenses, and the program has always been intended as a service to the community.

First United Methodist Church is a non-profit organization that supports all of its ministries solely through contributions of its members. FUMC operates under a 501c3 tax status and supports the broadcast called "Ten O'clock Worship Service" which airs weekly on our local NBC affiliate, WJHG - TV. This program is a blessing to the community as is expressed on a daily basis from people who are physically unable to attend church and many elderly and disabled people.

We believe that the local, non-news, non-repeat exemption to the closed captioning rule also applies to the FUMC broadcast. The program is produced locally and contains sermons and music which are solely of local public interest. The episodes contain no news and no repeat value.

As shown by the petition and its attachments, the commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The cost of the captioning would be excessively high and would have a significant impact on the Petitioner's operations. Because of the significant difficulty and added expense a waiver is warranted.

Respectfully submitted,


Steve Rascoe
Senior Pastor

Building Together for a
Brighter Tomorrow
"for such a time as this" Esther 4:14



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Senior Pastor

Rudy Olivo
Associate Pastor

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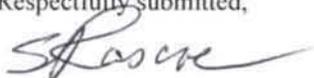
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We at First United Methodist Church believe that all documentation here within is complete and accurate to the best of our knowledge.

Respectfully submitted,



Steve Rascoe
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