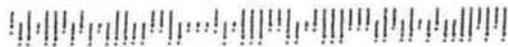


K.W. Brown Ministries, Inc
245 Las Gaviotas Blvd
Chesapeake, VA 23321



UNITED STATES POSTAGE

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JAN 23 2012
FCC Mail Room

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



CGB-CC-1182

K.W. Brown International
Ministries, Inc.
215 Las Gaviotas Blvd
Chesapeake, VA 23322
Phone: 757~547~3388
Fax: 757~410-3084
www.themountleads.org

Matthew 16:19

January 10, 2012

From: K.W Brown International Ministries Inc.
Keys to the Kingdom TV Broadcast
215 Las Gaviotas Blvd.
Chesapeake, VA 23322

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

Subj: EXEMPTIONS TO THE CLOSED CAPTIONING REQUIREMENTS ON THE BASIS
OF UNDUE BURDEN FOR OUR TV BROADCAST

1. K.W Brown International Ministries Inc. produces a weekly television broadcast called Keys to the Kingdom, we would like to file an exemption to the closed captioning requirements on the basis of undue burden that would be placed on Keys to the Kingdom television broadcast, which airs Saturdays' at 7:00am on Fox 43, Cox Communications channel 14 in accordance with the guidelines set forth to Section 79.1 of the Commission's rules, 47 C.F.R. § 79.1(t).
2. Keys to the Kingdom television broadcast mission is to make a difference to the world by developing and delivering a weekly spiritual encouragement broadcast to our captive audience.
3. The nature and cost of adding closed captioning to our television broadcast would severely impact our mission through the cost associated with getting a DVD transcribed for television broadcast. The cost on average is \$200 - \$300 set-up fee and \$12 a minute for transcribing, which our program runs 26 minutes and 30 seconds which would add \$318 per week to our broadcasting cost.
4. The impact on the operations of Keys to the Kingdom ownership would put them into a negative financial position and ultimately cause Keys to the Kingdom television broadcast ministry cease to operate.

5. Keys to the Kingdom financial resources are at the total discretion of our viewers who we depend entirely on the benevolence of the people who watch our ministry broadcast.
6. We also encourage people to become a partner of this ministry, partners assist us in fulfilling our God-given call to minister to the needs of men, women and children all over the world. Under the partnership umbrella, we are better equipped to handle this task and meet the spiritual and emotional needs of people. Through our television broadcast on Saturday at 7:00AM, God allows us to relate to people where they are, while at the same time delivering a message of hope.
7. Because of the prayers and financial support of our partners, Keys to the Kingdom is also able to address the tangible needs of families and individuals by providing food, clothing, shelter, and scholarships to graduating seniors and counseling and employment.
8. We have received many letters from people each week who were on the verge of suicide, divorce, bankruptcy or eviction before hearing a word through our Keys to the Kingdom television ministry that literally changed their lives forever! We even receive letters from inmates who watch our broadcast weekly.
9. Our goal would be to ultimately comply with the FCC closed captioning rules because we want everyone to hear and see our broadcast word so we can make a definite impact on the world through our Keys to the Kingdom Television ministry.
10. We will also make a written copy to those who inquiry about our broadcast and make available the audio portion of our broadcast to our viewers.

Sincerely,



Dr. Valerie K. Brown
Executive Director, Keys to the Kingdom