

CGB-CC-1236

Alpine

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April 10, 2012

Received & Inspected

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

APR 11 2012

FCC Mail Room

Dear Federal Communications Commission:

I am reaching out to you as my company; Alpine Buick GMC would like to request an exemption to the FCC's 'Closed Captioning' requirements. If we adhere to your closed captioning requirements, it would place an undue burden and financial hardship upon our dealership, and more importantly, the time required to "Close Caption" puts us in non-compliance with regional and state advertising guidelines.

Our Advertising Agency, New Energy Advertising has applied to become exempt from your Closed Captioning Rules (CG Docket No.06-181 OR Case Identifier #: CGB-CC-0918). Although they are currently in the process, we would also like to be exempt as an individual entity from them. The FCC's 'Closed Captioning' exemption would allow us the ability of having our own in-house production team to produce our infomercials.

Alpine Buick GMC is a single point auto dealer located in Denver, CO. Each week, we film a new commercial for the dealership in Spanish to run during mostly late night television (after 11:00 p.m.). Given the turn around time that it would take to have our commercial Closed Captioned, the commercial content would not be current as it relates to inventory, therefore jeopardizing our dealership following Colorado's state dealer laws.

To give you an idea of what it costs us to have our agency produce one of our 28:30 infomercial runs on average, \$1000 with a turn around time of 36 hours. To close caption a show, I believe it would require an additional week with an additional expense of \$500 per show. Once the closed captioning finally arrives, quite a few of our inventory featured in the videos would have been sold thus placing us in violation with the state. At this time, each and every show is in compliance with the advertising guidelines set forth by the state, with fully visible disclaimers and full graphics on every vehicle, and fully visible disclaimers and full graphics on any price/payment related item.

For the reasons outlined above, and due to the nature of our programming and its special time constraints to stay in compliance with regional and state requirements, I request that Alpine Buick GMC be given an exemption to the "Closed Captioning" requirement.

Kind Regards,



Mike Drawe, Owner
Alpine Buick GMC