

CGB-CC-0493

Received & Inspected

MAY 21 2012

FCC Mail Room



May 10, 2012

Federal Communications Commissions
Attention: CGB
Washington, DC 20554

Subject: Exemption to the Closed Captioning Rules
0493 River of Life Christian Center
"Chosen Generation"
Case ID CGB-CC-0493

To Whom It May Concern:

Chosen Generation is the nonprofit media ministry of The River of Life Christian Center of Orlando, Florida (ROLCC). The mission of The River of Life Christian Center of Orlando is to reach the world with the message of the Gospel of Jesus Christ. The television broadcast is one of the medium by which we preach the Word of God to thousands of people living in the greater Central Florida region.

Chosen Generation is hereby requesting further consideration as an individual exemption from the closed captioning rules for The River of Life Christian Center of Orlando, pursuant to Section 79.1 of the commission's rule. Since our initial request dated January 10, 2012 we have additional information that we are submitting that we feel will assist in the decision to grant us the exemption status.

Nature and Cost of Closed Captions

In researching the cost of closed captioning, we have found that the average cost per 30 minute broadcast is \$165.00. We broadcast 8 times a week, which calculates to \$1,320 a week and an annual expense of \$68,640.00.

Impact on the Operation of the Provider Program

Currently our in house broadcast cost are \$92,820.00 annually. We pay our broadcast out of our general operating funds. We are not sponsored by any organization to curtail the cost. If we combine the broadcast cost with the estimated closed captioning cost it would total approximately \$161,220.00. Additionally, the current production equipment we are using is outdated and has to be upgraded to HD compatibility. We have contacted vendors concerning the replacement of our equipment and we have been quoted an approximate replacement cost of \$75,000 - \$95,000.

Financial Resources of the Program Provider

The ROLCC is a tax-exempt, nonprofit organization. Our most recent financial statements are attached. We depend solely on contributions from the members of the church to cover the program expenses. Our main expenditures to date are for the staff, rent, liability insurance and other expenses necessary to provide the ministry needs of our members and the community we serve.

Additionally, on March 26, 2012 we entered into a loan agreement in the amount of \$1,367,000 to purchase a new worship facility. The loan is a construction loan that is structured as a line of credit. We have also engaged in a contract with an architect company to create the plans for the facility. The expense associated with this contract is separate from the loan in the amount of \$88,000 (copy attached).

Other Factors

We believe that the local, non-news exemption to the closed captioning rule applies to the Chosen Generation broadcast. The program is produced in house and distributed locally. The episodes are not news, and the electronic newsroom technique is not available. We contacted WTGL TV-45, the station we broadcast from locally, and they currently hold the exemption status. We have been told only "nationally aired" broadcast are required to be closed captioned from their station.

Conclusion

We are requesting a waiver of the closed captioning requirements at this time, and agree to be re-evaluated after an 3 year period. The Petitioner's type of operations and current financial position in reference to purchasing a new worship facility would make it difficult to provide the closed captioning as requested. We believe a waiver at this time would be warranted. If we are not granted the exemption status, we will have to make the decision to discontinue the Chosen Generation program.

This Declaration is true under Penalty or Perjury,



Marvin A. Jackson, Senior Pastor
River of Life Christian Center of Orlando

cdc
daj

Balance Sheet**05/16/2012**

As of April 30, 2012

Accrual Basis

Apr 30, 12**ASSETS****Current Assets****Checking/Savings**

Fairwinds FCU - Money Market 1,452.62

First Colony - Checking 148,991.54

First Colony - Money Market 227,239.23

First Colony - Tax Account 3,585.07

Suntrust - checking 28,127.61

Total Checking/Savings 409,396.07**Other Current Assets**

A/R-Return Checks 1,135.00

Security and Utility Deposits 1,000.00

Total Other Current Assets 2,135.00**Total Current Assets** 411,531.07**Fixed Assets**

1999 Audi 0.00

4300 Clarcona Ocoee 1,116,571.90

Audio/Visual Equipment 987.78

Broadcast, Sound and Music Equi 12,279.61

Computer Hardware/Software 6,626.71

Furniture and Fixtures 0.00

Hammond B3 Organ 0.00

Leasehold Improvements 4,690.72

Other Assets 0.00

Sanctuary Furniture and Fixture 0.00

Vehicle 99,033.42

Vehicle - Mercedes Sedan 0.00

Total Fixed Assets 1,240,190.14**Other Assets**

Petty Cash - Membership Svcs 100.00

Petty Cash - Product Table 250.00

Turn Key NewTek Software/etc 25,704.00

Total Other Assets 26,054.00**TOTAL ASSETS** 1,677,775.21**LIABILITIES & EQUITY****Liabilities****Current Liabilities**

Apr 30, 12

Accounts Payable	
2000 · Accounts Payable	11,175.32
Total Accounts Payable	<u>11,175.32</u>

Credit Cards	
American Express - Delta	4,178.13
Sam Ash Music	25.99
Total Credit Cards	<u>4,204.12</u>

Other Current Liabilities	
Scholarship Donation	1,992.00
2100 · Payroll Liabilities	2,346.17
2110 · Direct Deposit Liabilities	1,163.90
Total Other Current Liabilities	<u>5,502.07</u>

Total Current Liabilities 20,881.51

Long Term Liabilities	
First Colony - LOC	262,701.50
Regions Bank - Porsche	6,768.82
Suntrust - 2010 Mercedes	76,413.08
Total Long Term Liabilities	<u>345,883.40</u>

Total Liabilities 366,764.91

Equity	
Future Use Reserves Operating	35,734.97
Investment in Fixed Assets	44,454.77
Oasis Foundation	1,062,559.60
3000 · Opening Bal Equity	-695.09
3900 · Retained Earnings	95,935.38
Net Income	73,020.67
Total Equity	<u>1,311,010.30</u>

TOTAL LIABILITIES & EQUITY 1,677,775.21

This Instrument Prepared by
and Return to.
Robert B. White, Jr.
WHITE & LUCZAK, P.A
558 West New England Avenue, Suite 240
Winter Park, FL 32789 407/647-9300

DOC# 20120167498 B: 10354 P: 2090
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Rec Fee: \$154.50
Deed Doc Tax: \$0.00
DOR Admin Fee: \$0.00
Intangible Tax: \$2,734.00
Mortgage Stamp: \$4,784.50
Martha O. Haynie, Comptroller
Orange County, FL
SA - Ret To: RAHDERT STEELE REYNOLDS &
SA

MORTGAGE AND SECURITY AGREEMENT

THIS MORTGAGE AND SECURITY AGREEMENT (the "Mortgage") is executed and delivered this 26th day of March, 2012 by RIVER OF LIFE CHRISTIAN CENTER OF ORLANDO, INC., a Florida not-for-profit corporation whose address is 44 North Coburn Avenue, Orlando, FL 32805 (the "Mortgagor"), to and in favor of FIRST COLONY BANK OF FLORIDA, a Florida banking corporation whose mailing address is P. O. Box 940370, Maitland, FL 32794-0370, its successors and/or its assigns (the "Mortgagee"):

WITNESSETH, that for good and valuable consideration and also in consideration of the Mortgagee making a loan (the "Loan") to the Mortgagor which is evidenced by, and is in the principal amount set forth in, that certain Promissory Note, of even date herewith, made by the Mortgagor to and in favor of the Mortgagee in the original principal amount of One Million Three Hundred Sixty-Seven Thousand (\$1,367,000.00) Dollars, (as the same may hereafter be extended, modified, amended or renewed from time to time, the "Note"), the Mortgagor does hereby grant, bargain, mortgage, alienate, remise, convey and confirm unto the Mortgagee a mortgage lien upon and security interest in and to all of the following real and personal property:

THE MORTGAGED PROPERTY

A. The Real Property. All of the lands which are located in Orange County, Florida and which are legally described on Exhibit "A" attached hereto and incorporated herein (the "Land"), to have and to hold the same, together with all the improvements now or hereafter erected or attached thereto, together with each and every tenement, hereditament, easement, right, power, privilege, amenity and appurtenance thereunto belonging or in any way appertaining and the reversion and reversions, remainder and remainders, also all the estate, right, title, interest, homestead, right of dower, separate estate, property, possession and claim whatsoever in law as well as in equity of Mortgagor of, in and to the same in every part and parcel thereof, unto Mortgagee in fee simple.

B. Improvements. All buildings, structures, betterments, and other improvements of any nature now or hereafter situated in whole or in part upon the Land, regardless of whether physically affixed thereto or severed or capable of severance therefrom (the "Improvements").

C. Appurtenances. The benefit of all easements and other rights of any nature whatsoever appurtenant to the Land or the Improvements, or both, and all rights of way, streets, alleys, passages, drainage rights, sewer rights, and rights of ingress and egress to the Land, and all adjoining property, whether now existing or hereafter arising, together with the reversion or reversions, remainder or remainders, rents, issues, incomes, and profits of any of the foregoing.

Initials 

Subject: Contract payment schedule

Date: Tuesday, March 13, 2012 9:34:34 AM Eastern Daylight Time

From: Bob Miller <bob_miller@rmillerarchitecture.com>

To: ccole@rolcc.tv <ccole@rolcc.tv>

Celia:

Thank you for the call Friday morning telling us to come pick up the contract and check. As you requested I have a fee payment schedule noted here for the church remodeling project. The following is according to the Article 11 Compensation breakdown shown at section 11.5 plus the "projected schedule" noted on Appendix A. Per Scope of Work, item number 6 we have the following:

1.	Initial Payment (paid)	10,000
2.	April 1 st	30,750
3.	May 1 st	25,250
4.	June 1 st	10,000
5.	July 1 st - Dec 1 st @ \$2,000/mo	12,000
TOTAL		88,000

Reimbursable costs such as printing, plotting, etc. are not included but the total should not exceed \$1000 on a given month, nor \$4,500 total for the project.

We appreciate the opportunity to be of service for the River of Life Christian Center.

Very truly,
Bob

Robert D. Miller, FAIA
President


R. Miller
ARCHITECTURE, INC.

1201 Fairview Avenue
Winter Park, Florida 32789
Ph: 407/539-2412 Fx: 407/539-2041

RMillerArchitecture.com

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The signed & sealed documents take precedence over magnetic or electronically stored medium. RMA shall be