

COB CC-1244

Received & Indexed

JUN 15 2012

FCC Mail Room

Praise Time Ministries  
P. O. Box 644  
Johnson City, TN 37605  
April 4, 2012

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

Praise Time Ministries was founded in 2000 as a nonprofit organization. It began as a dream of one person and spread wildly throughout East Tennessee, Southwest Virginia, Kentucky, Western North Carolina and West Virginia into an outreach ministry to shut-ins, those who do not attend church at all, and everyone who simply enjoys Southern Gospel music.

The program's title is "Praise Time." The thirty-minute program consists of two- three songs sung by a women's trio called Sunshine, and the remainder of the program is a short gospel message by Minister Bret Jones. It serves the surrounding communities by providing an inspiring, thought-provoking half hour of motivational preaching and spiritually-uplifting singing.

Each program is thirty minutes long. It airs every Sunday morning at 8:30a.m. and Monday-Friday at 9:30 a.m. and 12:00 a. m. on CW.4 Channel 4, Bristol, VA. It is produced by Digital Cinema South, a local production agency, which charges \$250.00 per program to produce.

### **Impact on the Operation of the Program Provider**

Providing captioning for this program would result in the program, "Praise Time" being taken off the air. There are just not enough funds available to provide captioning and produce the program. It would increase the cost of production by 43%. In 2011, the Sunday morning airing of "Praise Time" had to be taken off the air due to loss of sponsor financial contributions because of job losses, etc due to the national economic conditions. The tv station then cut their price from \$350 to \$100 per Sunday morning program to let us return on the air after being off for seven months. Because we are the oldest local television program airing on that station, (we are in our thirteenth year), they have been willing to work with us to keep the program on air. But, if we have to add closed captioning it will cost \$150 more per Sunday. Thus, for the reasons set forth below, Praise Time Ministries hereby requests an "economically burdensome" exemption from the closed captioning rules for "Praise Time," pursuant to § 79.1 (f) of the Commission's rules.

Efforts to determine the cost of closed caption include contacting the sales representative at CW.4 who recommended Freedomia Communications, 425 West Chestnut St., Johnson City, Tn. Also, our producer Digital Cinema South, 228 Pickins Bridge Rd., Gray, Tn. These quotes are attached. We also have contacted our sponsors to request an increase in their contributions, and they have not been able to. Due to the economic conditions, some of our sponsors had to completely withdraw their contribution.

### **Financial Resources of the Program Provider**

The total cost of producing the show per year is \$32,000. (\$13,000 for production, \$1500 for taping, \$600 for purchase of tapes, and \$16,900 to CW.4 for air time. (The station has cut their rates 2/3 of their regular price to help us through some financial difficulties we have been experiencing due to the national economic crisis which has affected our contributors. For contributions see attachment.

### **Type of Operations of the Program Provider**

Praise Time Ministries is a non-profit religious institution which has one major activity-- to fund the "Praise Time" television ministry.

### **Conclusion**

As shown by this Petition and attachments, the Commission should grant waiver of the closed captioning requirements in this case, because requiring closed captioning would be economically devastating. The costs of captioning would be excessively high and would have a significant impact on Petitioner's operations, undermining its ability to provide the program. The Petitioner's type of operations and financial resources are 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 more information is needed, please contact me at the address provided below.

Respectfully submitted,

Praise Time Ministries



Lynnette Poe, Secretary

P.O. Box 644

Johnson City, Tn 37605-0644

Telephone: 423-306-7895

Fax: 423-975-6659

Dated: April 4, 2012

## Closed captioning

From: **Frank Weeks** (videodisc@comcast.net)

Sent: Thu 4/05/12 4:24 PM

To: sandra.cox@live.com

Digital Cinema South will provide Closed Captions for Praise Time (30 min) for \$150.00 per episode.

I will work with Tom Jennings and the Production dept. at WCYB (WB) to maintain the highest possible quality.

Frank Weeks  
Digital Cinema South

Aaron Sharp  
Freedonia Communications  
425 West Chestnut Street  
Johnson City, TN 37604  
April 9, 2012

Sandra Cox  
Owner  
Praise Time

Dear Sandra:

As you know closed-captioning for the hearing impaired, has become mandatory for many television stations to broadcast paid programming, including religious television programming. While it is a legal issue that many businesses and non-profits have to deal with, it is more than just an additional layer of labor or cost. It is an opportunity to get the message of your ministry to the deaf and others with hearing impairment.

#### OBJECTIVE

I and my team, all locally based in the Tri-Cities region, can provide quickly produced and accurate closed captioning. We can work directly with the ministry or with the external production company, whichever the case may be. The cost of purchasing closed captioning equipment and software can be very costly. For many instances it is easier to pay for external services to spread the cost out over time, while also preventing the worry of equipment upkeep or untimely equipment or software failure. It can also be a time and cost saving measure for production companies as they can focus more of their time and resources doing what they do best, producing quality creative content.

Our staff is experienced and has provided captioning services for infomercials, local television, and even national syndicated programming. From large jobs to small, we provide a quality product that meets your budget and your deadline.

The process is rather simple, all we need is a high-quality digital copy uploaded to our ftp site or one of your choosing. We can discuss options of file formatting with your editor. Once we have received the file we can have the product completed and a high quality digital copy, with closed captioning returned within \*24 hours. Then you can \*\*distribute your programming as per your current means.

\*24 hours if we are captioning on a regular schedule. It may take up to 48 hours if captioning is performed on a case-by-case basis.

\*\* In certain case we can also assist or handle digital distribution or local physical distribution (such as in the case of WCYB and it's sister stations). However we do not mail out tape or disc copies of the captioned product without special arrangements, which may involve additional cost.

Sandra Cox  
April 9, 2012  
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#### COST

1. Charges are based on the frequency of services.
  - a. Captioning scheduled on a weekly basis = \$150
  - b. Captioning scheduled on a monthly or bi-monthly basis = \$175
  - c. Captioning preformed only on an as-needed basis = \$225

#### CLOSING

I am happy to answer any technical questions, payment options, or any other questions or equerries that you may have. Please keep in mind the benefit of working with local companies, such as local contacts, the support of the local economy, and the local job market. We hope that we are able to assist you as part of your production and distribution chain. And do keep in mind that even if we are not commissioned to provide captioning services with you on a regular basis we can still be your back-up in case of equipment or software failure or production time constraints.

Sincerely,

Aaron Sharp  
President  
Freedonia Communications  
(423) 967-6380

# PRAISE TIME

P.O. BOX 644  
JOHNSON CITY, TN 37605

## ESTIMATED FINANCIAL STATEMENT 2012

EXPENSES:	TV TIME	-	\$16,900.00
	PRODUCTION	-	\$ 13,000.00
	TAPING	-	1,500.00
	PURCHASE TAPES		600.00
	<b>TOTAL</b>		<b>\$32,000.00</b>

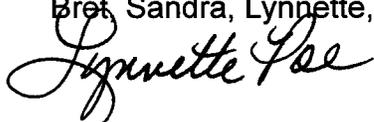
INCOME:	DEWEY CHRISTIAN:	\$175.00 MONTHLY
	MACEDONIA CHURCH OF CHRIST:	150.00 MONTHLY
	HARMON CHAPEL CH OF CHRIST :	100.00 MONTHLY
	MONTHLY TOTAL	\$425.00
	ANNUAL TOTAL	\$5100.00

FRIENDS AND FAMILY ANNUAL	\$26,900.00
<b>TOTAL</b>	<b>\$32,000.00</b>

NOTE: Praise Time was able to regain the Sunday morning time at a unbelievable rate of \$100.00 per week. Before it had been as high as \$350.00 weekly. This is definitely a blessing from God. We are so thankful for this unexpected decrease in cost.

Preaching the Word in Its Entirety,

Bret, Sandra, Lynnette, & Lauren



Received & Inspected

JUN 15 2012

FCC Mail Room

STATE OF TENNESSEE  
WASHINGTON COUNTY

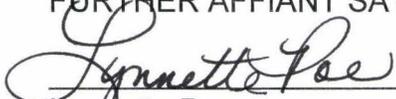
AFFIDAVIT OF PRAISE TIME MINISTRIES

I, Lynnette Poe, being first duly sworn, depose and state:

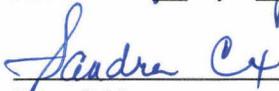
I am the secretary of Praise Time Ministries, a ministry in Johnson City, Tn. I am over the age of 21.

I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of Praise Time Ministries, and, upon information and belief, believe the statements regarding our organization and "Praise Time" to be true and accurate.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Lynnette Poe

SUBSCRIBED TO AND SWORN  
before me this 4<sup>th</sup> day of April, 2012.

  
\_\_\_\_\_  
Notary Public  
My Commission expires: 12-01-12

