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Received & Inspected

**Fallah Productions, Inc.**  
**Kirk Fallah**  
**18728 Center Ave.**  
**Homewood, IL. 60430**

JUN 21 2012

FCC Mail Room

**June 15th, 2012**

**Commissions Secretary, Office of the Secretary**  
**Federal Communications Commission**  
**Attn: CGB Room 3-B431**  
**9300 East Hampton Drive**  
**Capital Heights, MD. 20743**

Fallah Productions, Inc., hereby, re-submit this up-dated petition for exemption to the “closed captions” requirements for a show we produced titled “Chad Brown Poker Championship(s)” and Jax 50k Cash Game. I am requesting this exemption due to the fact it would cause my company and I additional financial burden for the type of show produced since the total production costs exceeded the available production budget. Also I strongly believe this show is within the guidelines as listed under the exemptions law 79.1(f) section # 4 and # 8.

**Undue Burden**

Other than myself, my entire staff/production crew consists of students and recent graduates from Columbia College Chicago that I hire on an event by event basis to produce each program. Fallah Productions does not have a sales department to generate revenue and since the show was located in another state I did not have the resources or access availability to generate anymore than minimal advertisement to supplement the production budget.

So far each show produced has met or exceeded the available budget leaving no post-production budget for editing, writing, or graphic design, or hosting. I have had to invest my own personal funds in order to be able to cover as much of the production budget as possible due to lack of sponsorship available for each program. If there are no available funds, I personally have to edit each show consuming 150+ man hours per episode with no compensation.

Each one-hour episode produced in High Definition (HD-Cam broadcast format), would cost anywhere from \$750.00 to \$1000.00 to have the program closed captioned for broadcast. This entire amount would have to be paid personally by me. The format for each of the already produced programs of would have to be re-mastered for every broadcast in order to add closed captioning which again would have to be paid personally by me. This is due to minor changes in content and graphical information for each program on the screen so as to keep the program updated for broadcast and maintain program continuity.

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**Under section 4 of 79.1(f)**

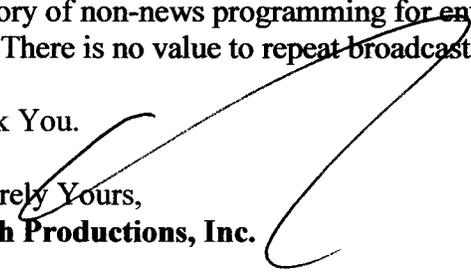
The shows I produce are primarily visual and graphically oriented enough so that an average viewer could easily follow the content without sound. Throughout the show players hold-hands and bet amounts as well as their current chip standings are textually and graphically represented on screen at the appropriate times. These elements and information on the screen keep the viewer informed about all of the action during the program. The best example of how and why this is needed for the program would be for viewers at local restaurants or bars who watch the program either with no sound or diminished sound due to the surrounding environmental atmosphere. Those viewers are still able to keep up with the all the action just as if they were at home listening to the program.

**Under section 8 of 79.1(f)**

The Chad Brown Poker Championship(s) and Jax 50K Cash Game shows falls within the category of non-news programming for entertainment and local public interest value only. There is no value to repeat broadcast other than covering the costs of the re-edit.

Thank You.

Sincerely Yours,  
**Fallah Productions, Inc.**



*Fallah Productions Inc  
18728 Center Ave  
Homewood IL 60430  
708-935-2861*

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*To Whom It May Concern,*

As the sole owner & operator of Fallah Productions which is the producer of the TV shows Windy City Poker Championship, Chad Brown Poker Championship, and Jax50K Cash game, I do 90% of the needed work in order to be able to produce and air these shows while keeping costs down. I do this by putting my heart and soul into the projects to retain maximum quality which may allow for me to have great TV production opportunities in the future, this also gives me a program I can be proud to call my own.

From finding a network to air the shows, a venue to host the show, sponsors, local advertisers interested in the show, as well as known poker professionals that offer their time to the event in hopes to draw more people to play. It is a daunting and expensive task. Along with the time and expense, I decided that I would hire local Chicago area college students and graduates as a crew members to not only give me talented production crew members, but to also give them a paid opportunity in their field of work.

Once I secure all the above elements and the poker production is finished. I then start the critical and most expensive aspect of a show...the post production editing, graphics and commentary. Not only do I get everything ready for post production, but I also edit and host the show. The reason I do it this way is not only to save on costs but to maintain a specific level of quality that I want for the shows.

For the past 3 years I have been building a name for myself and my company, by producing high quality shows with little or no budget to be aired on cable networks in the United States.

I make sure that my graphics are so detailed that anyone can easily follow the program without sound. This works great for places like a sports bar which is a public setting where there is a higher level of noise as compared to the TV audio. The graphics I use keep an even flow to the game itself so even a beginner poker player or a non-poker player can understand and follow the different hands being played.

With the current economy I often fall short in getting enough funds to begin each project and have had to use my own personal funds to complete the programs. Since I am still in the process of establishing a name and reputation with my company and establish my mark in this area of public entertainment breaking even or just below even is a win for me.

As stated in my initial petition for exemption the additional cost for me to implement closed captioning would run an additional \$750-\$1000 for having the HD-cam produced

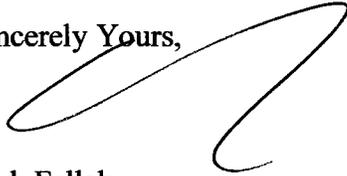
shows ready for broadcast with Closed Captioning, as well as an additional \$750-\$1,000 to up-grade previously produced and aired shows that are shown as re-runs. These additional costs would not leave me any chance to produce another show and I would have to dissolve my company and find another profession. This would also leave my hired staff for the productions without the consistent work I have been able to provide.

Also I adamantly believe in the quality of the graphics that I demand my show exhibit are more than sufficient for anyone to follow the play action and progress of the show. I offer any show I have produced and aired as an example for any person of your choice to view and comment on. I believe in my work and stand behind its quality as the best example of the validity of my request for exemption.

With sincere thanks and hopes I formally submit this affirmation of my petition for closed captioning exemption.

Thank you.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Kirk Fallah', written in a cursive style.

Kirk Fallah