

CGB-CC-1089



Received & Inspected

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AUG 01 2012

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GospelMusicArts.org

July 25, 2012

Mr. Roger Holberg  
Attorney, Disability Rights Office  
Federal Communications Commission  
Washington, DC 20554

Re: Letter of July 3, 2012

Dear Mr. Holberg:

Pursuant to your enclosed letter dated July 3, 2012 regarding Gospel Music Arts' Petition for an exemption from the Commission's Closed Captioning Requirements, Gospel Music Arts is re-submitting information previously submitted to you on April 18, 2012. We are making this available for public inspection.

Thank you very much.

*Gospel Music Arts*

*Diane McKoy*

# **GOSPEL MUSIC ARTS REQUESTING WAIVER FOR CLOSED CAPTIONING**

**REGARDING FCC LETTER DATED FEB. 29, 2012 FRONT PAGE ITEMS NUMBER (1) THROUGH (5)**

## **(1) DOCUMENTATION OF GOSPEL MUSIC ARTS' ANNUAL FINANCIAL STATUS SUFFICIENT TO DEMONSTRATE GOSPEL MUSIC ARTS' INABILITY TO AFFORD CLOSED CAPTIONING . . .**

<b>EDITING</b>	<b>DECIFIT FOR EDITING</b>	<b>NEEDED FOR EDITING</b>	<b>DONATIONS</b>	<b>* MISCELLANEOUS UNAVOIDABLE COSTS</b>
<b>\$5,000</b>	<b>\$7,000 YR</b>	<b>\$12,000 YR</b>	<b>\$1,650</b>	<b>\$1,500</b>

**\*Travel to gather footage, DVD costs/shipping etc.**

- **Gospel Music Arts already has a deficit.**
- **Gospel Music Arts' deficit is greater now for airing paid programming than ever, due to rising costs of editing, travel, and unforeseen emergencies.**

## **(2) INFORMATION ABOUT COSTS ASSOCIATED W/CLOSED CAPTIONING THE SPECIFIC PROGRAM(S) FOR WHICH GOSPEL MUSIC ARTS IS REQUESTING AN EXEMPTION**

- **Gospel Music Arts Telecast cannot possibly underwrite the costs associated w/Closed Captioning fees, as we already have a deficit as stated above. The TV station is willing to waive Closed Captioning fees if the FCC will give GOSPEL MUSIC ARTS a waiver for airing 6:00AM or later than.**

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**(3) VERIFICATION THAT GOSPEL MUSIC ARTS TELECAST HAS SOUGHT CLOSED CAPTIONING ASSISTANCE (e.g., FUNDING, SERVICES) FROM GOSPEL MUSIC ARTS' VIDEO PROGRAMMING DISTRIBUTOR; ALSO NOTE THE EXTENT TO WHICH SUCH ASSISTANCE HAS BEEN PROVIDED OR REJECTED**

- **Gospel Music Arts has sought for, but could NOT find, corporate sponsorship for our Telecast.**
- **Gospel Music Arts has made numerous appeals on our Telecasts.**
- **Attached is a list of Closed Captioning providers, which are not affordable and completely out of the question for Gospel Music Arts Telecasts.**

**(4) VERIFICATION THAT GMA HAS SOUGHT ADDITIONAL SPONSORSHIP SOURCES OR OTHER SOURCES OF REVENUE FOR CAPTIONING**

- **Gospel Music Arts Telecast continues to appeal to the public for revenue during our Telecasts, however, no one has come forth to offer sponsorship.**

**(5) INFORMATION ON THE TYPE OF GMA OPERATION(S) AND THE IMPACT THAT PROVIDING CAPTIONS WOULD HAVE ON GOSPEL MUSIC ARTS' PROGRAMMING ACTIVITIES, FOR EXAMPLE, THE EXTENT TO WHICH GOSPEL MUSIC ARTS' PROGRAMMING MIGHT NOT BE SHOWN IF WE ARE REQUIRED TO PROVIDE CAPTIONS.**



# JG STUDIO HD

727-546-7900 Fax 727-546-8640 Kathy@JGSMediaServices.com JGStudioHD.com

## CLOSED CAPTIONING FOR HDCAM & DVCPRO HD

DESCRIPTION	MINIMUM CHARGE	PER MINUTE	60-MINS	90-MINS
Import 1080i or 720P File from Hard Drive	\$ 150.00	\$ 4.00	\$ 240.00	\$ 360.00
Digitize from HD Videotape (any format)	\$ 250.00	\$ 5.00	\$ 300.00	\$ 450.00
Upconvert 720P to 1080i (required for output to HDCAM)	\$ 250.00	\$ 5.00	\$ 300.00	\$ 450.00
Transcription (if needed)	\$ 95.00	\$ 2.50	\$ 150.00	\$ 225.00
Closed Captioning and Encoding	\$ 495.00	\$ 14.95	\$ 897.00	\$ 1,345.50

Rate Card Applies to Dubs

## CLOSED CAPTIONING FOR STANDARD DEFINITION

DESCRIPTION	MINIMUM CHARGE	PER MINUTE	60-MINS	90-MINS
Import Video File from Hard Drive	\$ 100.00	\$ 2.50	\$ 150.00	\$ 225.00
Digitize from SD Videotape (any format)	\$ 150.00	\$ 4.00	\$ 240.00	\$ 360.00
Transcription (if needed)	\$ 95.00	\$ 2.50	\$ 150.00	\$ 225.00
Closed Captioning and Encoding	\$ 325.00	\$ 10.25	\$ 615.00	\$ 922.50

Rate Card Applies to Dubs

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- **With an FCC Waiver, Gospel Music Arts Telecast, a catalyst for strengthening the community, and strives to develop an innovative cultural arts establishment of Gospel music with opportunity to apply one's self into creative arts of music, singing and spiritual dance. If there is no closed captioning, the benefit of our Telecast will not be in effective, in as much as the deaf and blind are not usually the ones who wreck havoc in our communities. With an FCC Waiver Gospel Music Arts gets closer to helping eliminate prejudice and discrimination, combating juvenile delinquency. Our Nation seems to be spiraling downward due to the lack of positive music/influence. It seems people would wake up and stop destroying each other and realize our Nation was built on a positive note.**
- **The reason Gospel Music Arts goes the extra mile to make a positive difference in the community, even though there is a deficit, the Chair and Co-chair have felt compelled to withdraw from their dwindling personal savings and fixed income in order to continue airing the Telecast, in that we are determined to make a positive impact for the good of the community.**
- **People who experience "mind-attack" may turn to negative music influences that frequently speak loudly into their hearts, causing them to indulge in drugs and alcohol, which propels them into an out of control behavior, become school/work/family dropouts, and wasting the use of their invaluable minds.**

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- **Those actions help to weaken the community, negatively affecting their lives and culture of our nation. With an FCC Waiver, Gospel Music Arts gets closer to facilitating relief of the distressed and underprivileged, which can ultimately lessen neighborhood tension and help to eliminate prejudice and discrimination, combating juvenile delinquency and other negative actions.**

**Charity for the Needy and Ministry Works (DBA Gospel Music Arts) is a 501(c)3 Organization; a catalyst for strengthening the community and strives to develop an innovative cultural arts establishment of Gospel music with motivation to apply one's self into creative arts of positive music, singing, and spiritual dance. Gospel music has enhanced many lives as well as the foundation of our Nation.**

**We, the community, get so busy “doing in our activity-driven society” that we become soul weary and lose the radical joy we could have toward our faith and our lives. Gospel Music Arts care about humanity and The Humanities, endeavoring to prevent breakdown, violence or depression while creating, besides the real world, a more human world.**

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**We, at Gospel Music Arts, think it is time for positive programming to re-enter the television programming in order to bring back peace and harmony in our communities. America was founded on positive beliefs and we would like to help preserve the beliefs and provide this for future generations. Without an FCC Waiver small entities, such as Gospel Music Arts, are prohibited from making this tremendous, positive difference in the communities which we are striving so hard to accomplish!**

**D McKoy & M Statzer  
Chair and Co-chair  
of Gospel Music Arts**

**Attachment**