



Casa Sobre la Roca
Iglesia Cristiana Integral

September 5, 2012

Received & Inspected

SEP 10 2012

FCC Mail Room

Federal Communications Commission
Washington, D.C. 20554
Attn: Mr. Roger Holberg
Attorney, Disability Rights Office
Consumer and Governmental Affairs Bureau

Case Identifier: CGB-CC-1216

Mr. Holberg:

In response to your letter dated August 8, 2012, we would like to make the following clarifications:

1. The Television Program Hechos y Cronicas is a program produced in the facilities of our local church in Bogota, Colombia <http://www.hechosycronicas.tv> This Television program is private and is not sold by any company. Since this television program is produced in our country and according to the guidelines and regulations to broadcast the television program, we are not required to provide closed captions by the law.
2. The television program is sent to our offices so we can send it to the broadcasting company from which we rent a 30-minute space to broadcast it. The Video Programming Distributor that we are contracted with is Univision - Orlando, who offered us the best schedule and best price among all available Video Programming Distributors in our area.
3. Univision - Orlando does not directly provide closed caption services as it is required by the Commission. On the other hand, we were required to submit the television program already with the closed captions or with the closed caption exemption. Univision - Orlando provided us with 2 companies that provide this required closed caption service. The cost of this labor is more expensive than the cost of renting the space to broadcast it. Additionally, we do not have the financial resources within our Budget to afford this outlay. If we are still required the closed caption or we can't find a company that will do the service for free, we will be forced to suspend the broadcasting of the program due to economic burden.



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- 4. Please find attached letter from Univision where they state that we are required to provide the closed caption. Also, please find attached communication sent from one of the companies estimating the labor cost to provide the closed caption service.

We fully understand and respect the guidelines and regulations of the Commission and respectfully direct to you to formally request consideration for exemption of the closed captioning services so we can broadcast Hechos y Cronicas as we receive it from the producing company, which is entirely social and nor commercial.

Is there a possibility to be provided with a company that can assist us with the closed caption service free of charge? we have searched within our possibilities and have found this service to be an economic burden for our church. We have also enclosed a DVD with a sample of the Television Program so you can review its contents. Document also is being signed under oath as requested.

We look forward to hearing a positive response from your entity.

Sincerely

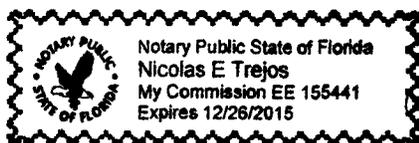
Rev. Fernando Garcia
Senior Pastor

=====
State of Florida
County of Orange

Sworn to and subscribed before me this 5th day of Sept, 2012, by Fernando Garcia

(NOTARY SEAL)

Personally Known OR Produced identification (Type of Identification) DL B 621-240-56-047-0



Asunto: Rv: Close Caption Weaver Info

De: edgar alfonso cano eslava (ecano560@yahoo.es)

Para: nicolastrejos@yahoo.com;

Fecha: Miércoles, febrero 22, 2012 2:59 P.M.

Mas informacion

Received & Inspected

----- Mensaje reenviado -----

De: Rosa Pagan <rpagan@entravision.com>
Para: ecano560@yahoo.es
Enviado: Miércoles 22 de febrero de 2012 14:51
Asunto: Close Caption Weaver Info

SEP 10 2012

FCC Mail Room

Edgar: encuentre esta informacion con todos los datos, si usted lo hace, seria de gran ayuda para su iglesia.

Rosivel

Individual Petitions for Exemption from the Closed Captioning Requirements – Economically Burdensome Basis

(formerly referred to as "undue burden petitions")

The Commission's rules provide procedures for petitioning the Commission for an exemption from the closed captioning rules where compliance with the rules would be economically burdensome. Exemptions may be granted, in whole or in part, for a channel of video programming, a category or type of video programming, an individual video service, a specific video program, or a video programming provider. A petition for an exemption must be supported by sufficient evidence to demonstrate that compliance with the closed captioning requirements would be economically burdensome (would result in a "significant difficulty or expense").

The Commission must consider the following factors in making an economically burdensome determination:

1. the nature and cost of the closed captions for the programming;
2. the impact on the operation of the provider or program owner;
3. the financial resources of the provider or program owner; and
4. the type of operations of the provider or program owner.

The petitioner also may present for the Commission's consideration "any other factors the petitioner deems relevant to the Commission's final determination," including alternatives that might constitute a reasonable substitute for closed captioning. **There is no form to fill out.**

Specifically, each petition should contain current documentation in accordance with the original factors outlined in section 713(e) of the Communications Act and Section 79.1(f) of the Commission's rules, to support a claim that providing closed captions would be economically burdensome (would result in a "significant difficulty or expense") as defined by the criteria listed above. In order to make such a showing, each petitioner must provide documentation of its financial status to demonstrate its inability

to afford closed captioning. In addition, petitioners seeking an exemption should verify in their requests that they have obtained information about the costs they would incur to caption their programming, and that they have sought closed captioning assistance from their video programming distributors, as well as note the extent to which such assistance has been provided or rejected. Finally, each petitioner must indicate whether it has sought additional sponsorship sources or other sources of revenue for captioning and show that it does not have the means to provide captioning for its programming. **Petitions must also be supported by an affidavit.** Affidavit is defined in Webster's as "a written statement made under oath before an official."

Failure to support an exemption request with adequate explanation and evidence to make these showings will result in dismissal of the request.

Each petition that provides sufficient information will be placed on public notice, pursuant to the Commission's rules, and posted in the Commission's Electronic Comment Filing System (ECFS), to permit interested persons to file comments or oppositions to the petition. Comments and oppositions to the petition generally are due within 30 days from the date of the public notice. All comments and oppositions must reference **CG Docket No. 06-181 and contain the case identifier (CGB-CC-XXXX)** for that petition. Comments and oppositions sent via e-mail or faxed to the Commission will not be considered. Comments and oppositions must be served on the petitioner at the address found on the petition, and include a certification that they have been served on the petitioner.

Any reply filed by a petitioner to the comments in the record is due 20 days after the comment deadline. Replies to comments or oppositions must be served on the commenting or opposing party and shall include a certification that the commenter was served with a copy.

An original and two (2) copies of all comments, oppositions, and replies must be filed with the Commission. Filings may be sent by hand or messenger delivery in accordance with the filing instructions below for petitions.

All petitions and responsive pleadings must contain a detailed, full showing, supported by affidavit, of any facts or considerations relied on.

We will conduct an individual review of each petition to determine the extent to which providing captioning would be economically burdensome for the petitioner, based on information provided in the petition and any comments received.

Instructions for Filing a Closed Captioning Exemption Petition

You must send the FCC an original and two (2) copies of your petition for closed captioning. Filings must be sent by hand or messenger delivery, commercial overnight courier, or by first class or overnight U.S. Postal Service mail.

For U.S. Postal Service mail, including Express Mail, Priority Mail, and First Class Mail, please use the following address:

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

For commercial overnight mail, such as Federal Express or United Parcel Service, please use the following address:

Office of the Secretary
 Federal Communications Commission
 Attention: Disability Rights Office, Room 3-B431
 9300 East Hampton Drive
 Capitol Heights, MD 20743

Electronic filing and faxes of petitions will not be accepted.

We will acknowledge receipt of your petition via postal mail. However, given delays associated with receiving postal mail at the Commission, please wait at least two weeks before contacting Commission staff to make inquiries about whether your petition has been received. **You must include the case identifier number in all correspondence with the Commission regarding your petition.**

Please note that pursuant to Commission rules, the petition, as well as any supporting financial information provided, will be available for public inspection in the Commission's Reference Information Center and on the Commission's website. **As such, petitioners should redact social security numbers and employee identification numbers from their submissions.** Petitioners requesting confidential treatment of any information contained in a petition must specifically request such treatment in writing. Please note, however, that the "public version" of the petition must contain sufficient documentation to support the petitioner's claim that closed captioning would be economically burdensome.

Pursuant to the closed captioning rules, during the pendency of an economically burdensome determination, the video programming subject to the request for exemption shall be considered exempt from the closed captioning requirements. The "pending by" date is the date that the FCC receives the petition, indicated by the FCC's mailroom stamp.

If you have questions regarding this process please e-mail captioningexemption@fcc.gov.

Rosivel Pagan

Account Executive
Univision / Telefutura Orlando
523 Douglas Ave.
altamonte Springs, FL 32714
(407) 774-2626 ext. 229 office
(407) 774-3384 fax
(407) 928-8846 cell



From: "Lourdes Fiallos" <lfiallos@dicapta.com>
Subject: Cotización Servicios Closed Caption
Date: Mon, February 27, 2012 2:58 pm
To: administracion.orlando@casaroca.org

Estimado Nicolas:

Gracias por corroborar la dirección

Lourdes Fiallos

Received & Inspected
SEP 10 2012
FCC Mail Room

De: Lourdes Fiallos [/squirrelmail/src/compose.php?send_to=lfiallos@dicapta.com]
Enviado el: Wednesday, February 22, 2012 3:58 PM
Para: 'administracion.orlando@casaroca.com'
Asunto: Cotización Servicios Closed Caption

Estimados Señores Casa sobre la roca,

Los precios de los servicios de Closed Caption (subtitulado oculto) son los siguientes:

Precio \$ 6.00 minuto de Closed Caption

\$ 4.00 minuto de Transcripción.

\$55.00 Layback (copia con el Closed Caption insertado)

Total para un programa de media hora \$355.00

El cliente debe proporcionar el material en cualquiera de los siguientes formatos:

Betacam Digital

Betacam SP

Mini-DV

Atentamente,

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Lourdes Fiallos

DICAPTA

Tel. 407-389-0712 | Fax. 407-682-1997

900 Fox Valley Dr. | Suite 204 |

Longwood, FL 32779

www.dicapta.com



Attachments:

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| Type: text/plain |
| image001.jpg |
| Size: 5.6 k |
| Type: image/jpeg |

Captioning Your Weekly Show

From: **Constance Carlson** (ccarlson@vicaps.com)
Sent: Thu 5/10/12 4:44 PM
To: jenny323@hotmail.com

Received & Inspected
SEP 10 2012
FCC Mail Room

Hi Jenny,

It was good speaking with you again this AM! In speaking with my technical team this afternoon, they asked if you would be able to supply a test file of your .mp4 video master for caption-embedding purposes? We have caption-embedded them in the past with some success, however some exports are better than others. Might that be possible?

Assuming that the caption-embedding of your .mp4 video goes well, or if you elect to receive a caption data file (.cap) instead that the station can encode on their end, I am pleased to present this quote for captioning services:

Video Caption Corporation would be delighted to assist you with the Closed Captioning of your 30-minute Spanish-language video. As I understand it, you would provide your show to us as a digital file (.mp4). Our deliverable to you might be:

- A Spanish Caption Data File (Basic Roll-up, .cap)

Pricing: \$220 per show, or

- A Caption-embedded Video Master (.mp4)

Pricing: \$275 per show

Price includes transcription, captioning, and either caption file prep and output or caption-embedding of the video master, file prep and output. Our standard turnaround for your project is 4 business days. Faster turnarounds are available at an additional charge.

I'll follow up with you tomorrow to discuss our quote and answer any questions you may have!

Best regards,