



**FIRST UNITED
METHODIST CHURCH**

412 West Main • P.O. Box 854 • Tupelo, MS 38802
662-690-8100
www.fumctupelo.com

Received & Inspected

SEP 10 2012

FCC Mail Room

August 31, 2012

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

RE: CGB-CC-1224

On July 17, 2012, First United Methodist Church of Tupelo requested to withdraw the petition for exemption from closed captioning requirements we filed with your office on March 13, 2012.

At that time, our program was only carried on one television station, WKDH-TV, which is covered under 79.1(d)(12) of the Commission's rules.

On September 1st, 2012, WKDH ceased operations and is no longer on the air. To continue our live broadcast, First United Methodist Church of Tupelo has entered into an agreement with WTVA-TV for carriage on channel 9.2.

Since WTVA is not covered under 79.1(d)(12) of the Commission's rules, First United Methodist Church respectfully requests a waiver under 79.1(f) of the Commission's rules and that the FCC reopen case CGB-CC-1224.

With this letter, I am including the information requested by the Commission in your letter sent to us on June 27, 2012.

David Dillard
Church Administrator
First United Methodist Church of Tupelo
662-690-8100

Mission

Love God

Love Neighbor

Celebrate &

Serve Christ

Together

Vision

A Vibrant

Christian

Community of

Disciples

Reaching Out

to All as a

Beacon of Hope

Values

Rooted in

Scripture

Centered in

Christ

Forming in

Love

STATE OF MISSISSIPI
COUNTY OF LEE

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AFFADAVIT OF DAVID DILLARD

I, David Dillard, being first duly sworn, depose and state:

1. I am the Church Administrator at First United Methodist Church of Tupelo, a church in Tupelo, Mississippi. I am over the age of 21.
2. I have reviewed the Petition for Exemption for Closed Caption Requirements filed on behalf of First United Methodist Church of Tupelo, and upon information and belief, believe these statements regarding First United Methodist Church of Tupelo to be true and accurate.

FURTHER AFFIANT SAYETH NOT



David Dillard



David,

There are three ways to close-caption a live broadcast. One is to use speech recognition software, another is "shadow speak" (like we use for Focus), and the most accurate way, transcription, using a stenographer and a steno machine.

Assuming we would want the most accurate system, we would need to purchase a steno machine, a high speed computer, captioning software, and a captioning encoder. Costs for the hardware could go as high as \$8,000 to \$10,000 since WKDH broadcasts in HD. Then we would need to look for a real-time captioner (probably a highly skilled court reporter or stenographer). The stenographer could be located here in the building or off site. This person could charge anywhere from \$200 to \$300 an hour, possibly more on Sunday, and depending where he or she was. Extra fees could possibly be charged for telephone lines if the Stenographer is off site.

With all of these considerations, I feel we need to charge roughly \$700 per hour to add closed-captioning to a weekly live Sunday morning broadcast to cover our costs.

Dee

Walter Spain
President
Southern Broadcasting, Inc.
P.O. Box 1645
Tupelo, MS 38802
Phone: 662-842-7620 Ext. 30
Fax: 662-844-7061

----- Original Message -----

From: David Dillard
To: 'Walter Spain'
Sent: Monday, July 16, 2012 5:00 PM
Subject: RE: Closed Captioning Cost

Dee,

That amount will more than double what we will be spending on our broadcast each week. Is there any way WKDH can share some of this cost with FUMC?

If not, we will have to consider discontinuing our broadcast if we are required to caption by the FCC due to this additional cost as there is no money in our budget to cover the added expense.

David Dillard
Church Administrator
First United Methodist Church
Tupelo, MS
662-690-8066 - Direct
662-690-8100 - Main
662-401-3163 - Cell

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FCC Mail Room

From: Walter Spain [<mailto:wdspain@wkdh.com>]
Sent: Monday, July 16, 2012 4:47 PM
To: david@fumctupelo.com
Cc: Shannon Turner
Subject: Re: Closed Captioning Cost

David,

After discussing with Shannon to closed caption a live one-hour program each Sunday would cost FUMC \$700 per hour in production charges.

Take care,

Dee

Walter Spain
President
Southern Broadcasting, Inc.
P.O. Box 1645
Tupelo, MS 38802
Phone: 662-842-7620 Ext. 30
Fax: 662-844-7061

----- Original Message -----

From: David Dillard
To: 'Dee Spain'
Sent: Thursday, July 12, 2012 3:29 PM
Subject: Closed Captioning Cost

Dee,

Can you provide me a quote on how much WKDH will charge to caption our Sunday morning broadcast live? Tape delay is not an option as we follow the Methodist Church lectionary and we would be a week behind if we do not broadcast live.

David Dillard
Church Administrator
First United Methodist Church
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FCC Mail Room

From: Dr.Barnes [mailto:revjbarnes@aol.com]
Sent: Wednesday, July 18, 2012 10:35 AM
To: david@fumctupelo.com
Subject: Re: Funding Request

I am sorry but we have no funds available in the district to assist with closed captioning of your live Sunday morning broadcast.

Yours in Christ

Jimmy L. Barnes; Tupelo D.S.

-----Original Message-----

From: David Dillard <david@fumctupelo.com>
To: 'Dr.Barnes' <revjbarnes@aol.com>
Sent: Tue, Jul 17, 2012 12:47 pm
Subject: Funding Request

Dr. Barnes,

As a member of the Tupelo District of the Mississippi Conference of the United Methodist Church, we are requesting funds from the Tupelo District to assist us with closed captioning of our live Sunday morning broadcast.

We have received pricing from WKDH that will require us to more than double the weekly cost of our program if the FCC denies our petition for exemption. If this exemption is denied and we cannot obtain other funding, we will most assuredly be forced to discontinue our Sunday broadcast. As one of the flagship churches in our Conference, it would be a great loss to our community to not be able to spread God's word via television each Sunday morning at 11:00.

Thank you for considering our request and I look forward to hearing from you soon.

David Dillard
Church Administrator
First United Methodist Church
Tupelo, MS
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