

CGB-CC-1176

Received & Inspected
OCT 02 2012
FCC Mail Room

09/25/2012

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th St. SW Room TW-A325
Washington, DC 20554
ATTN: CGB Room 3-B431

Re: Message For Today Petition for Exemption from the Commission's Closed Caption Rules
Case No. CGB-CC-1176
CG Docket No. 06-181

Dear Ms. Dortch,

I am writing in reply to the statements made by Institute for Public Representation on September 10, 2012. Several misleading and unfounded statements are made in this letter regarding Message For Today (MFT) and our application for exemption. I will address them in the following comments.

MFT does not want to deny access to any portion of the public from any of its programs. However, we are not able to financially provide closed captioning. If we are not granted this exemption we will be required to remove our program from all channels which require CC which will limit our ability for future growth in any other markets.

We have examined other sources of funding for assisting with the cost of providing this service. We have visited with each station along with our air time brokers for assistance in finding funding for this service. We have been turned down by all potential sources due to the small size of our ministry. For these reasons, we are asking for the CC exemption under the provision stated in the FCC provision. CC would be "economically burdensome" to MFT and deem it impossible to keep its ministry available to any portion of the public.

As provided in our original request, CC costs would double our current air time cost for each program. If we were a larger ministry on 5-10 separate stations spreading the cost to each station would be a possible solution. However, due to financial constraints with this ministry, we are not able to grow into new marketplaces at this time. Outside financial funding is not being provided at this time. In attempting to be a "self supporting" ministry we do rely on donations to continue the ministry and broadcast. In providing the cost for CC serves we have submitted the most reasonable price we could receive in our area.

OCT 02 2012

FCC Mail Room

I would now like to address the comments and accusations made by Georgetown Law as to the size and "proxy" for the Iowa City Seventh-day Adventist church. Message For Today is organized at this time and incorporated in the State of Iowa as of Fall 2011. With a Board of Directors, myself being the Director, I approached the Iowa City Seventh-day Adventist church to see if they would be interested in having our program aired in their community. At this time, they have supported MFT with a onetime start up assistance of \$15,000. In exchange we are to be on the air for radio and TV for 1 year. This onetime gift does not cover the cost of air time for the entire year. MFT is solely responsible for all air time costs.

Message For Today is NOT a PROXY for the church to advert such requirements as CC by the FCC. The one and only association between Message For Today and the Iowa City Seventh-day Adventist church is that I serve the church as a "lay" pastor in which I do not receive any salary for my services. They do allow MFT to use the church auditorium for recording of broadcasts. The only portion of the church service used for the broadcast is the sermon/talk. Message For Today is not being funded by the Iowa City Seventh-day Adventist church. They have assisted us in attempting to reach our community with the good news of God's love for all of us.

We are charged in this letter as being little more than the programming outreach for the church. This is false. MFT is not associated with the Iowa City Seventh day Adventist church. The church has no control or presence in the operation of MFT. This is a FALSE accusation and statement made in the reply to our application. The Iowa City SDA church is not attempting to evade any rules from the FCC. The Iowa City SDA Church does not have a radio or TV program being aired by the church. MFT is 100% separate from any religious organization. There is no reason to request or provide any financial reports or budgets from the church. Comment made on Page 6 of the letter states our request must be dismissed due to the financial report from the church not being provided is not supported or accurate. As stated, there is no reason to provide this information because the Iowa City SDA church is not a part of the MFT ministry.

Our request for exemption included requests to the 2 broadcasters we are using at this time along with a letter of request to friends of the program. Both requests were denied and a fundraiser letter did not provide enough funding to support the current air time for more than 2 months. We have made these requests per your guidelines.

I am offended by the accusations made in the letter from the Institute for Public Representation. They have attempted to make numerous false and misleading accusations against MFT and our ministry along with attempting to make claims against the Iowa City Seventh day Adventist church as trying to be misleading and dishonest in their church business and any possible association with MFT. Let me make this as clear as possible. Message For Today is an independent private ministry which has NO association with the Iowa City SDA church outside their support in the ministry of sharing God's love with our community. They are not responsible for any of MFT's operations or day to day business. All funding and programming is the sole responsibility of MFT and its Board of Directors.

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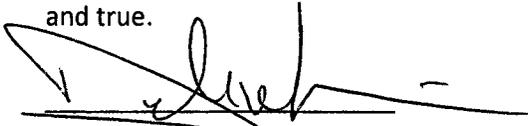
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If CC exemption is not granted for Message For Today we will be forced due to "economically burdensome" reasons to discontinue our broadcast. We hope that you will see in our request that we meet FCC requirements for exemption for closed captioning. We thank you for your time and consideration on this matter.

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Respectfully submitted,
Message For Today

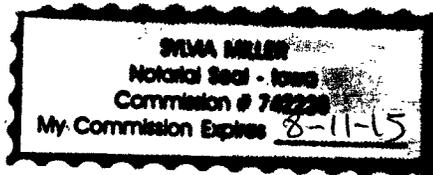
I certify under this written statement, under oath, that all information provided in this letter is accurate and true.



Dale Morrison / Director
PO Box 10253
Cedar Rapids, IA 52410
319-329-7780

COUNTY OF: LINN
STATE OF : IOWA

Dated: 9-27-2012




SYLVIA A. MILLER