



The Congregation of God Seventh Day

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Received & Inspected
OCT 25 2012
FCC Mail Room

October 17, 2012

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Attn: CGB Room 3-B431

Re: The Congregation of God Seventh Day Petition for Exemption from the
Commission's Closed Captioning Rules
Case No. CGB-CC-0709, CG Docket No. 06-181

Dear Ms. Dortch:

This letter is in response to the document from the Institute for Public Representation, Georgetown Law. I carefully read their documentation and found it to be flawed in one very important area as noted on page 6, 2nd paragraph. The annual surplus of \$12,800.74 would be quickly eaten up and exceeded when you consider that each program will cost us \$200 per week and we are doing 4 programs per week, so the actual cost per week would be \$800, with an annual cost of \$41,600.00. As you can see from our financial condition, that would be totally unachievable, based upon our current budget.

Our budget is strictly based on the free-will offerings of our supporters around the country and can vary greatly from year to year. If we were required to close caption our programs, it would be prohibitive and the Watch American Program could not be televised.

There are many other churches that provide similar information to the television public, who have means far exceeding ours. No doubt, those ministries will be close captioning their television programs because of their ability to afford it.

In closing, Ms. Dortch, we ask you to reject this claim by this Georgetown group. If it is allowed to stand, our Watch America Program could possibly be no more on television.

Thank you very much for your kind assistance and we look forward to a decision in the very near future.

Sincerely,

John A. Pinkston
Pastor/President

Cc: Roger Holberg, Disability Rights Office
Consumer & Governmental Affairs Bureau

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