



1119 Donovan st. Selma VA 24474

Received & Inspected

MAY -3 2013

FCC Mail Room

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

April 29, 2013

Re: Petition for Exemption From Closing Captioning Requirements

To Whom It May Concern:

Pursuant to Section 79.1(f) of the rules of the Federal Communications Commission (the "Commission"), Interconnect Media Networks Systems, LLC ("IMN") hereby seeks an exemption from the closed captioning rules of the Commission. IMN is a video programming provider, and compliance with the closed captioning requirements of the Commission would be economically burdensome for IMN. Pursuant to Section 79.1(f) of the Commission's rules, the following factors are considered 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.

All four (4) factors weigh heavily in favor of a determination that compliance with the closed captioning requirements would be economically burdensome for IMN. IMN provides certain television programming (both live and prerecorded) to the end users of its proprietary software platform via the internet. IMN's software platform does not enable closed captioning data to be passed through to the end users. It would cost approximately \$25,000 per channel of programming to modify the code of the software platform to enable the closed captioning signals to be passed through to the end users. IMN currently provides in excess of 100 channels of programming, which would result in a programming expense of approximately \$2,500,000 for compliance with the closed captioning requirements. IMN is a small startup company (still in its beta phase), with an end user base of less than 2000 users. IMN's annual revenues are approximately \$0. Thus, IMN does not have the financial resources necessary to reprogram its software platform to enable the closed captioning signals to be displayed to end users.

Thus, IMN does not have the financial resources necessary to reprogram its software platform to enable the closed captioning signals to be displayed to end users.

IMN hereby requests that this petition for exemption from the closed captioning requirements of the FCC be granted because it would be economically burdensome for IMN to comply with such requirements.

If you have any questions, please contact my attorney, Rebecca B. Conner, at 540-443-3911 (phone), 540-961-2941 (fax) or by email at rebecca.conner@leclairryan.com.

By signing below, I certify, under oath, that the information contained in this petition is accurate in all respects.

Sincerely,



Steven Turner, CEO, Interconnect Media Networks Systems, LLC

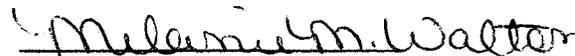
STATE OF VIRGINIA)
) SS:
COUNTY OF Alleghany)

On this 29th day of April, 2013, personally came before me Steven Turner, and this person acknowledged under oath, to my satisfaction, that:

(a) This person signed, sealed and delivered the foregoing instrument as the CEO of Interconnect Media Network Systems, LLC; and

(b) This document was signed and delivered by Interconnect Media Network Systems, LLC, as its voluntary act and deed by virtue of authority from its Board of Managers.

MELANIE M WALTON
NOTARY PUBLIC
Commonwealth of Virginia
Reg. #324956
My Commission Expires June 30, 2016



Notary Public (seal)