

FAITH CENTER

P A D U C A H

Received & Inspected

NOV - 4 2013

FCC Mail Room

Awaken and Equip

October 25, 2013

COPY

Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-C438
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: Case Identifier: CGB-CC-0731

To Whom It May Concern:

Per your correspondence dated September 26, 2013, we are, again, providing the requested information. Pursuant to the Public Notice issued by the Federal Communications Commission, dated October 17, 2013, and supported by conversation with your attorney, Roger Holberg, the morning of October 25, 2013, we are noting that the filing deadline has been revised to no earlier than November 4, 2013, due to the government-wide lapse in funding.

To facilitate the ease of identification of our responses to your request, we are listing the specific request, per your letter, with the appropriate response.

- **Name the programming for which an exemption is requested....**
 - ✓ Faith Center is a small religious organization airing a weekly religious program entitled, "**Awaken the Heart.**"
- **The nature and cost of the closed captions for the programming.**
 - **Include documentation for two or more recent quotes...closed captioning services...**
 - ✓ Faith Center has obtained quotes from several companies over the past several months with regard to captioning "Awaken the Heart." These companies all have staffs dedicated to writing a complete transcript of the show, and then linking that transcript into captions that are time synced with the program. The two files are then burned to a disc and sent to the broadcaster.
 - ✓ Two of the quotes we received are copied and displayed in Attachment A.
 - **...include an estimate of your annual cost to caption your program(s)...**
 - ✓ The estimated total annual cost of the captioning is approximately \$16,500 above what we already spend for the show to be recorded, edited, and aired. The factors are not only the cost of the actual transcribing and captioning reflected in the quotes, but also includes courier services charges between our location, the broadcaster and the captioning company.
 - **In addition.....if you have considered buying equipment to produce the closed captioning yourself, provide information about the costs to purchase and maintain the equipment and for any costs associated with hiring personnel to operate the equipment for one year.**
 - ✓ Yes, we have investigated purchasing our own equipment and software to caption the program. Our current software, used in-house to edit and author the show to a DVD for distribution to the broadcaster, does not allow us to caption. We also, do not have anyone in-house who is able to perform the captioning duties.
 - ✓ We have received quotes for different software to use in-house. In addition to the actual captioning software, we will also have to purchase a separate authoring software to combine the two files into one, that will be burned to a DVD for providing to our broadcaster. Copies of these quotes are displayed in Attachment B.

- ✓ Our minimum estimated costs to purchase the software packages are \$ 5,400. The cost of an additional employee to accomplish the captioning will be approximately \$ 8,500 per year. This assumes that the employee would not have expertise in the captioning process and would have a three to four month learning curve to get up to speed and be able to work at a reasonable pace for the remainder of the year. The total estimated expenditure in the first year would be \$ 13,900.
- **The impact of captioning on your programming activities.**
 - ✓ Under our current business conditions, there is no way we can afford to continue this broadcast. The cost of captioning would more than double our current cost to produce the program. We are already in a weakened economic area. Major employers are closing the leading employment opportunities in the region. There are no large companies coming in to take their place. This leaves many without incomes sufficient to maintain their previous income levels and thus their support of the church.
- **Your financial resources.**
 - **Provide information about all income and all expenses for your organization, as follows...**
 - **Provide a statement of all income (cash receipts) and all expenses (cash disbursements) for the two most recent completed calendar or fiscal years. Cash receipts include money received from all sources for your entire organization, not just the video program(s). Cash disbursements include money paid for purchases, expenses, and settlements of obligations throughout the year for your entire organization, not just the video program(s). List, describe, and provide dollar amount for each type of cash receipt and cash disbursement for the two most recent completed calendar or fiscal years. Cash receipts and cash disbursements may each be subtotaled. You must provide a total net dollar amount (sometimes called a surplus or deficit, or profit or loss) for all cash receipts and all cash disbursements.**
 - **Provide audited financial statements or an accountant's compilation of financial statements for the two most recent completed calendar or fiscal years....**
 - ✓ The 2011 Profit and Loss information submitted on July 3, 2012, reflects the total income and expense, profit/(loss), and financial position of the business at that time. 2011 was a very difficult year. Many changes have been implemented to recover our business position, including the reducing our staff by five people; media, administration, children's ministry, etc. Please refer to **Attachment C 1.**
 - ✓ A set of 2012 Profit and Loss information submitted on April 3, 2013, is also included. As you will see, it is an improvement over 2011. However, the general revenue is still trending down both for all of 2012 and has continued the trajectory for the first quarter of 2013. As with the 2011 financial reports, the reports provided for 2012 are reflective of the full business income and expense and balance data. It is not related to only the cost of the show production. Please refer to **Attachment C 2.**
 - **Provide information about the current assets and current liabilities of your overall organization, as follows...**
 - **Provide a statement of all current assets and current liabilities of the overall organization as of the last day of the two most recent completed calendar or fiscal years. List, describe, and provide the dollar amount for each type of current asset and current liability so listed. This requirement may be satisfied by providing complete balance sheets as of the last days of the two most recent completed calendar or fiscal years.**
 - ❖ **Current Assets are any asset (or resource) as of the last day of the calendar or fiscal year that can be converted into cash within the following year....Examples of current assets for a corporation: cash; accounts receivable; inventory; marketable securities; and prepaid expenses.**
 - ❖ **Current Liabilities are obligations (or debts) as of the last day of the calendar or fiscal year that must be paid within the following year....Examples of current liabilities for a corporation: accounts payable; accrued liabilities; notes payable; current portion of long-term debt; and taxes payable.**
 - ✓ As with the Profit and Loss Report for 2011 noted above, the Balance Sheet for 2011 is also re-included. Please refer to **Attachments D 1.**
 - ✓ As with the Profit and Loss Report for 2012 noted above, the Balance Sheet for 2012 is also re-included. Please refer to **Attachments D 2.**
 - **Video programming distributor assistance.** Verify that you have sought assistance (such as funding or services) from your video programming distributor(s). A distributor is any TV broadcast station, cable

provider, or satellite system that shows your program(s). State whether you have asked your distributor(s) to help you provide captions, where this request was accepted or rejected, and, if accepted, describe the assistance that each distributor has offered to provide.

- ✓ We have appealed to our broadcasting/video programming distributor for assistance in providing closed captioning. They do not provide any of these services. A letter from our broadcaster is attached. Please refer to Attachment E.
- Additional sponsorships. Verify that you have sought additional sponsorships (other than from your program distributor) or other sources of revenue. State your efforts to obtain revenue, and whether these requests were accepted or rejected. If rejected, state whether you do not otherwise have the means to provide captioning. If accepted, describe the assistance that each sponsor has offered to provide. If your organization is precluded from seeking outside assistance or you cannot solicit and/or accept such sponsorships, provide the reason why you are unable to do so.
 - ✓ In addition to the request from our broadcaster, we have made a targeted appeal to our congregation and local community for support of the program. Specific requests have also been made to our business community for sponsorships to this end. Currently, we have received little response.
 - ✓ We do not have any other means to financially support this request for captioning.
- Your type of operations.
 - ✓ Faith Center is a small religious organization airing a weekly religious program entitled, "**Awaken the Heart**." We are a church with a focus on the recovery and rehabilitation needs in our local area. Our congregational mix has grown to approximately 30% in the recovery category.
- Affidavit or declaration.
 - ✓ See Attachment F.
- ...also provide other information that you deem relevant to our determination of your exemption request pertaining to the impact that captioning will have on your program...
 - ✓ As previously stated, we are a small church with declining revenues. We have operating guidelines that help us to govern our spending in specific areas of our business, such as personnel costs, ministry costs, building and general, and benevolence expenses. We are currently at our upper limits for the year.
 - ✓ We provide a vital role in assisting our community and the "Awaken the Heart" program plays an important role. It will be extremely financially detrimental for our church to have to pay for the additional cost of closed captioning. At this time we feel that the economic cost would be prohibitive to continuing the program. The costs range from double to more than double the current production costs just for the additional cost of the closed captioning.

We are unable to meet the financial obligations required to provide closed captioning programming at this time. If required to provide this service, we will have to eliminate our airing of "Awaken the Heart."

Based on the above information, we request an exemption from the closed captioning requirements.

Sincerely,



John Aitken
Pastor/President
Faith Center of Paducah, Inc.

Cindy Abbott

From: Rita Caswell <rcaswell@vicaps.com>
Sent: Friday, May 17, 2013 1:13 PM
To: cindyabbott@faithcenter.tv
Cc: Constance Carlson; Tiffany Thomas; traffic@vicaps.com
Subject: Faith Center: Your Captioning Project
Attachments: image001.gif

Hi Cindy,

Great speaking with you today! I will not be providing a quote for .SCC file as I have confirmed with my production team that you would not be able to use .SCC file with Final Cut Pro 10. I am forwarding you the quote my colleague Constance provided to Sondra for captioning services. I will call you to discuss.

Best Regards,

Rita Caswell
Customer Service and Sales



NEW YORK | BURBANK

800-705-1203 (phone)
800-705-1207 (fax)
rcaswell@vicaps.com
www.vicaps.com
[OneHub](#)

From: Constance Carlson [<mailto:ccarlson@vicaps.com>]
Sent: Wednesday, April 03, 2013 5:05 PM
To: 'media@faithcenter.tv'
Cc: Rita Caswell (rcaswell@vicaps.com); Tiffany Thomas (tstthomas@vicaps.com); Traffic Department (traffic@vicaps.com)
Subject: Your Captioning Project

Hi Sondra,

Good speaking with you today! Video Caption Corporation would be delighted to assist you with the Closed Captioning of your 30-minute English language weekly religious show. As I understand it, you would provide your video masters to us as digital files. Our deliverable to you would be Closed Caption Masters (Basic Roll-up Style Captions) authored to DVD/autoplay + 1 DVD Closed Caption Master Copy.

Pricing: \$240 per show

Price includes transcription, captioning (Basic Roll-up Style Captions), DVD authoring, DVD copy, and disc stock. Our standard turnaround for your project is 3 business days. As a regular client, we will waive rush fees

on the occasional 2-day turnaround and significantly discount our rates on other services. Shipping and handling are additional.

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

Best regards,

Constance

Constance Carlson
Vice President, Sales & Marketing



NEW YORK | BURBANK

800-705-1204 (phone)

800-705-1207 (fax)

ccarlson@vicaps.com

www.vicaps.com

[OneHub](#)

From: Christine Gonzalez <Chris@captiondepot.net>
Sent: Friday, November 01, 2013 5:25 PM
To: 'Cindy Abbott'
Subject: RE: Closed Caption - Request for Quote

Hi Cindy,

I'm not sure if my previous email went through, but the engineer confirmed the encoding to DVD.

Each episode would come out to 295.00. Please let me know if you have any questions. Thanks,

Christie



Telestream

846 Gold Flat Road
Nevada City CA 95959
Phone (530) 470-1300 Fax (530) 470-1301

Attachment B 1

DATE: 10/24/2013

PROPOSAL FOR CLOSED CAPTIONING SOFTWARE

To: Faith Center of Paducah
c/o Cindy Abbott
cindy@faithcenter.tv

Qty	Items & Descriptions	Unit Price	Extended Price
1	CPC MacCaption/CaptionMaker WebPlus software for web, DVD, iTunes iTT, .SCC, and SMPTE TT	\$3995	\$3995
1	1 Year Maintenance and Support Tech Support for WebPlus (15% of the list price of the software – 1 st Year Mandatory)	\$599.25	\$599.25
1	UPS Ground shipping	\$0	\$0
1	Sales Tax (reflected on final invoice)	\$0	\$0
	TOTAL		\$4594.25

Shipping, F.O.B. Origin.

This proposal is valid for 10 days.

For details about the software, check the link: <http://www.cpcweb.com/products>

Maintenance and Support entitles you to technical support provided 9am - 7pm Eastern time, Monday - Friday, excluding federal holidays and unlimited software updates for the number of support years purchased.

Prepared by McLean Anderson
(301) 738-8487 x 105
mcleana@telestream.net



Telestream

848 Gold Flat Road
Nevada City, CA 95959
Phone (530) 470-1330 Fax (530) 470-1331

Attachment B 2

DATE: 10/24/2013

PROPOSAL FOR CLOSED CAPTIONING SOFTWARE

To: Faith Center of Paducah
c/o Cindy Abbott
cindy@faithcenter.tv

Qty	Items & Descriptions	Unit Price	Extended Price
1	CPC MacCaption/CaptionMaker DTV software for web, DVD, and TV broadcast (MPEG-2 PS) Includes file SD and HD captioning for ProRes .mov (Mac only) and H.264 TS streams, .SCC, and SMPTE TT	\$6995	\$6995
1	1 Year Maintenance and Support Tech Support for DTV (15% of the list price of the software – 1 st Year Mandatory)	\$1049.25	\$1049.25
1	UPS Ground shipping	\$0	\$0
1	Sales Tax (reflected on final invoice)	\$0	\$0
	TOTAL		\$8044.25

Shipping, F.O.B. Origin.

This proposal is valid for 10 days.

For details about the software, check the link: <http://www.cpcweb.com/products>

Maintenance and Support entitles you to technical support provided 9am - 7pm Eastern time, Monday - Friday, excluding federal holidays and unlimited software updates for the number of support years purchased.

Prepared by McLean Anderson
(301) 738-8487 x 105
mcleana@telestream.net

Faith Center of Paducah, Inc.
Profit & Loss
January through December 2011

	<u>Jan - Dec 11</u>
Ordinary Income/Expense	
Income	
Donations	
Total Donations	<u>\$586,214.95</u>
Total Income	<u>586,214.95</u>
Gross Profit	<u>\$586,214.95</u>
Expense	
ADMINISTRATIVE SERVICES	
Total Administrative Services Expenses	<u>24,568.98</u>
MINISTRY EXPENSES	
Total Ministry Expenses	<u>122,152.95</u>
MISSIONS and OUTREACH	
Total Missions and Outreach	<u>47,565.65</u>
PAYROLL EXPENSES	
Total Payroll Expenses	<u>317,107.79</u>
OCCUPANCY EXPENSES	
Total Occupancy Expenses	<u>133,585.49</u>
CORPORATE BUSINESS	
Total Corporate Expenses	<u>22,553.92</u>
Total Expense	<u>\$667,534.78</u>
Net Ordinary Income	<u>(81,319.83)</u>
Net Income	<u>\$ (81,319.83)</u>

Faith Center of Paducah, Inc.
Profit & Loss
January through December 2012

Attachment C 2

	<u>Jan - Dec 12</u>
Ordinary Income/Expense	
Income	
4000 · Donations	
Total 4000 · Donations	<u>512,334.46</u>
Total Income	512,334.46
Gross Profit	<u>512,334.46</u>
Expense	
Women's Ministry	
Total Women's Ministry	128.90
1.000 · FIRST TENTH - TITHE	
6090.00 · LIFE SUPPORT	
Total 6090.00 · LIFE SUPPORT	30,603.13
6160.00 · SAMARITAN'S PURSE	
Total 6160.00 · SAMARITAN'S PURSE	8,608.87
6161.00 · MISSIONS OUTREACH	
Total 6161.00 · MISSIONS OUTREACH	<u>16,721.43</u>
Total 1.000 · FIRST TENTH - TITHE	<u>55,933.43</u>
2.000 · MINISTRY EXPENSES	
6001 · Ministry Expenses paid by CC	33,677.63
6010.00 · CHILDREN'S MINISTRY	
Total 6010.00 · CHILDREN'S MINISTRY	4,319.48
6020.00 · FAITH KIDZ	
Total 6020.00 · FAITH KIDZ	923.18
6060.00 · EVENT EXPENSES	
Total 6060.00 · EVENT EXPENSES	2,766.24
6070.00 · DREAM TEAM/FRED'S MINISTRY	
Total 6070.00 · DREAM TEAM/FRED'S MINISTRY	2,512.77
6075.00 · HOSPITALITY MINISTRY	
Total 6075.00 · HOSPITALITY MINISTRY	140.24
6110.00 · MINISTRY RESOURCES	
Total 6110.00 · MINISTRY RESOURCES	91.50

Faith Center of Paducah, Inc.
Profit & Loss
January through December 2012

	<u>Jan - Dec 12</u>
6115.00 · CONG. MINISTRY RESOURCES	
Total 6115.00 · CONG. MINISTRY RESOURCES	5,191.63
6120.00 · MEN'S MINISTRY SUPPORT	
Total 6120.00 · MEN'S MINISTRY SUPPORT	158.74
6130.00 · WOMEN'S MINISTRY SUPPORT	
Total 6130.00 · WOMEN'S MINISTRY SUPPORT	1,041.82
6140.00 · PRAISE/WORSHIP MINISTRY	
Total 6140.00 · PRAISE/WORSHIP MINISTRY	1,006.15
6150.00 · PRAYER MINISTRY	
Total 6150.00 · PRAYER MINISTRY	104.95
6180.00 · TECHNICAL MINISTRY	
Total 6180.00 · TECHNICAL MINISTRY	38,452.67
6190.00 · YOUTH MINISTRY	
Total 6190.00 · YOUTH MINISTRY	<u>2,264.02</u>
Total 2.000 · MINISTRY EXPENSES	92,651.02
3.000 · BUILDING & GENERAL EXPENSES	
6000.00 · ADMINISTRATIVE SERVICES	
Total 6000.00 · ADMINISTRATIVE SERVICES	29,730.75
6210.00 · OCCUPANCY EXPENSES	
Total 6210.00 · OCCUPANCY EXPENSES	53,136.57
6230.00 · CORPORATE BUSINESS	
Total 6230.00 · CORPORATE BUSINESS	<u>27,423.20</u>
Total 3.000 · BUILDING & GENERAL EXPENSES	110,290.52
4.000 · PEOPLE COSTS	
6200.00 · PAYROLL EXPENSES	
Total 6200.00 · PAYROLL EXPENSES	<u>162,473.42</u>
Total 4.000 · PEOPLE COSTS	162,473.42
Total Expense	421,477.29
Net Ordinary Income	<u>90,857.17</u>
Net Income	90,857.17

Faith Center of Paducah, Inc.
Balance Sheet
As of December 31, 2011

	<u>Dec 31, 11</u>
ASSETS	
Current Assets	
Checking/Savings	
Total Checking/Savings	\$56,573.46
Other Current Assets	
Total Other Current Assets	<u>10.00</u>
Total Current Assets	<u>56,583.46</u>
TOTAL ASSETS	<u><u>\$56,583.46</u></u>
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Total Accounts Payable	\$ 900.00
Other Current Liabilities	
Total Other Current Liabilities	<u>7,780.95</u>
Total Current Liabilities	<u>8,680.95</u>
Total Liabilities	\$ 8,680.95
Equity	
3010 - Unrestrict (retained earnings)	129,222.34
Net Income	<u>(81,319.83)</u>
Total Equity	<u>\$47,902.51</u>
TOTAL LIABILITIES & EQUITY	<u><u>\$56,583.46</u></u>

5:29 PM
04/03/13
Accrual Basis

Faith Center of Paducah, Inc.
Summary Balance Sheet
As of December 31, 2012

	<u>Dec 31, 12</u>
ASSETS	
Current Assets	
Checking/Savings	145,739.56
Total Current Assets	<u>145,739.56</u>
 TOTAL ASSETS	 <u><u>145,739.56</u></u>
 LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	200.85
Other Current Liabilities	7,042.03
Total Current Liabilities	<u>7,242.88</u>
 Total Liabilities	 7,242.88
 Equity	 138,496.68
 TOTAL LIABILITIES & EQUITY	 <u><u>145,739.56</u></u>



STREET ADDRESS
310 Broadway
Cape Girardeau,
Missouri 63701

MAILING ADDRESS
P.O. Box 100
Cape Girardeau,
Missouri 63702-0100

PHONE
(573) 335-1212

FAX
(573) 335-6303



RECEIVED

4-8-13 *ng*

Attachment E

April 3, 2013

Faith Center of Paducah
Pastor John Aitken
5121 Charter Oak Drive
Paducah, KY 42001

Dear Pastor Aitken:

In response to your inquiry as to whether KFVS/WQWQ provides closed captioning services to providers of programming that airs on our stations, I regret to inform you that at the current time we do not provide that service.

If you have any further questions about this, please call me at 573-335-1212.

Sincerely,

Kathy Cowan
Program Director

