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OCT 28 2013

FCC Mail Room

CGB-CC-0888
Docket #06-181

PUBLIC VERSION OF PETITION

OCT 28 2013

FCC Mail Room

**Fr. Cedric Ministries**

The Passionists of Holy Cross Province 430 Bunker Hill Road, Houston TX 77024
tel 713 464 4932 x32 fax 713 932 7303 web www.frcedric.org

October 25, 2013

VIA OVERNIGHT MAIL

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

Re: Father Cedric Pisegna Ministries
Case Identifier: CGB-CC-0888
Program Name: "Live with Passion!"
Response to Request for Supplemental Information to Petition for Closed Captioning
Exemption

Dear Sir or Madam:

I am writing in response to your request dated September 26, 2013 for supplemental information concerning my Petition for an exemption from the closed captioning requirement for the television program "Live with Passion!" As a vowed religious and the founder of Father Cedric Pisegna Ministries (FCPM), I am providing the following additional information so that the FCC may complete its consideration of my Petition:

(1) **Background** – As was stated in my letters of June 15, 2012 and August 24, 2012 with respect to my Petition, I am an ordained Catholic priest and a vowed member of a Roman Catholic religious order, The Congregation of the Passion, Holy Cross Province (hereinafter, the "Congregation"). In accordance with my professed vow of poverty and the Constitutions of the Congregation, I do not possess any personal financial assets that may be utilized to support FCPM's expenses, nor does any of FCPM's income benefit me personally. Rather, any net earnings from FCPM's activities, or any net loss incurred, benefits or burdens my local Passionist community, The Congregation of the Passion, Holy Name Community ("Holy Name"), located in Houston, Texas.

Holy Name is a religious organization incorporated under the Non-Profit Corporation Act of the State of Texas, and its sole corporate member is the Congregation. Both the Congregation and Holy Name are an integral part of the Roman Catholic Church in the United States, and both are listed in *The Official Catholic Directory* and covered by the group exemption from federal income taxation granted by the IRS to organizations so listed. Under federal income tax law, the Congregation and Holy Name are both churches and publicly supported charities, depending heavily upon donations from the general public for the funds to operate. As such, the FCC's

closed captioning requirements, as explained in greater detail below, present a significant economic burden to Holy Name, as the programming in question does not generate advertising or other for-profit revenues that can be used to offset the cost of closed captioning.

(2) **Name of the Programming for Which an Exemption is Requested** – My Petition for an exemption from closed captioning is for the 28:30-minute Catholic teaching program entitled “Live with Passion!” Specifically, FCPM is requesting an exemption from the closed captioning requirements for all episodes of this program that were recorded prior to 2013, and which continue to air on thirty (30) television stations. A complete list of all 158 episodes of this program that were recorded prior to 2013 is attached in Exhibit A.

(3) **Cost of Captioning Services** – On average, FCPM produces twenty (20) episodes of the “Live with Passion!” program each year. Three rate quotes for closed captioning these programs are attached in Exhibit B. These quotes range from \$250 to \$330 to closed caption a single 28:30-minute episode of “Live with Passion!” (Please note that this base rate is for caption preparation only, and excludes other costs, such as shipping.)

In a demonstration of good faith, I am willing to closed caption all future episodes of “Live with Passion!” effective immediately. FCPM has already closed captioned the just-recorded episode series #200, which includes nine (9) episodes of “Live with Passion!”

As listed in Exhibit A, there are 158 previously produced episodes of “Live with Passion!” that currently air on television stations nationwide. Because FCPM only produces approximately 20 new episodes per year, and “Live with Passion!” airs regularly on various television stations (on some stations weekly, on other stations several times a week), this means that the majority of the episodes aired are those that have been previously recorded. As a result, a denial of my Petition for an exemption from closed captioning for all previously recorded program episodes would force FCPM to closed caption all 158 previously recorded episodes and to redistribute the newly captioned master copies of those episodes to all stations currently airing them. As of this writing, “Live with Passion!” airs on 30 stations. The cost of redistributing newly captioned master copies of all 158 previously recorded program episodes to these stations would be at least \$149,830 (see video production proposal dated October 21, 2013, attached in Exhibit C). Thus, the final cost to FCPM of a denial of a closed captioning exemption for all previously produced programs is as follows:

Cost to closed caption 158 pre-recorded episodes at \$250 each	\$ 39,500
Cost to redistribute captioned master files	<u>149,830</u>
Projected expenditure to closed caption all pre-recorded episodes	\$189,330

(4) **Impact of Captioning on FCPM’s Programming Activities** – Attached to this letter, please find a profit and loss statement for FCPM for fiscal years ended June 30, 2012 and 2013, along with a copy of FCPM’s bank statement for the month ended September 30, 2013 (see Exhibit D). As of September 30, 2013, FCPM has insufficient cash available to both continue operations and absorb the cost of closed captioning the 158 pre-recorded episodes of “Live with Passion!”

calculated above. Accordingly, a denial of the Petition for an exemption from closed captioning previously recorded program episodes would cause FCPM to cease its television ministry.

(5) **FCPM's Financial Resources** – Attached to this letter, please find a detailed profit and loss statement for FCPM for fiscal years ended June 30, 2012 and 2013 (see Exhibit D), as requested. FCPM does not have audited financial statements or an accountant's compilation of financial statements, as neither of these is required of either FCPM or Holy Name for other regulatory purposes. Similarly, because FCPM is a ministry of Holy Name, and Holy Name is considered a "church" organization under federal income tax law, neither FCPM nor Holy Name is required to file a federal Form 990 with the Internal Revenue Service, under Section 6033(a)(3)(A)(i) of the Internal Revenue Code.

As requested, a statement of current assets and liabilities of FCPM as of June 30, 2012 and 2013 is attached in Exhibit E.

(6) **Video Programming Distributor Assistance** – FCPM has sought assistance from each of the stations on which "Live with Passion!" is aired. The largest network of these stations, Trinity Broadcasting Network, does not provide closed captioning for any program providers. Similarly, stations WSHM-Fox 66 in Flint, Michigan, and KVHP-Fox 29 in Lake Charles, Louisiana do not provide closed captioning services (see attached letters in Exhibit F).¹ Despite repeated requests for a written communication from other stations airing "Live with Passion!" thus far I have received only verbal confirmation from those other stations that they also do not provide closed captioning services. I have confirmed that this state of affairs has not changed since my letter of August 24, 2012.

(7) **Additional Sponsorships** – Religious programming differs greatly from other television programming in that it does not attract sponsors. Sponsorship, even when undertaken for public television programming, is undeniably motivated by the sponsor's expectation of a commercial return from building brand awareness among potential consumers of its products or services. Strictly faith-based content, such as that in "Live with Passion!" does not offer any commercial potential to would-be sponsors. Instead, the only potential source of alternate funding for FCPM to afford closed captioning would be a grant from a private foundation that supports religious activities, particularly religious media. The grantmaking process can take several months from the initial submission of a grant inquiry to the potential receipt of funding. At this time, FCPM has not identified any charitable institutions amenable to providing the necessary funding for the \$189,330 cost of captioning 158 pre-recorded programs. Please see the attached letter from FCPM's producer, The Mass Media Group, regarding faith based programming (Exhibit G).

(8) **FCPM's Type of Operations** – FCPM is a television preaching ministry supported by viewer donations and royalties derived from the publication and sales of seventeen (17) books and study guides I have authored on subjects of Catholic faith. FCPM also receives royalties from the sale of audio CDs and DVDs of previously recorded episodes of "Live with Passion!" FCPM operates

¹ Both Trinity Broadcasting Network and station WSHM-Fox 66 are listed as Video Programming Distributors on the FCC's website.

under the auspices of The Congregation of the Passion, Holy Name Community, a religious community of vowed Catholic priests and brothers located in Houston, Texas that is part of the Roman Catholic Church in the United States.

(9) **Affidavit** – As requested, my signed and notarized affidavit is attached to this submission in Exhibit H.

(10) **Request for Confidential Treatment** – On behalf of FCPM, I request confidential treatment for the financial information presented in Exhibits D and E. The publication of this proprietary financial information could have a chilling effect on future negotiations with television networks and stations for the purchase of television time slots in which “Live with Passion!” would be aired. Because the cost of television time is determined by the rate that is negotiated separately with each individual television station, any station could use such proprietary information to gain an upper hand in rate negotiations. Further, as explained in paragraph (5) above, neither FCPM nor Holy Name is required by federal tax law to publish financial information in the publicly available format of the IRS Form 990, so the release of such data in the context of my Petition to the FCC would be setting an inappropriate precedent.

Accordingly, I have enclosed a second, redacted version of this Petition labeled “Public Version” which contains all other information supporting my position that closed captioning of FCPM’s previously recorded programs would impose a truly untenable economic burden.

In sum, I respectfully request that FCPM be granted an exemption from closed captioning those episodes of the television program “Live with Passion!” that were recorded prior to 2013. As previously stated, FCPM intends to closed caption all episodes to be recorded on or after the date of this letter, beginning with the just-recorded “Live with Passion!” episode series #200.

If I can be of further assistance, or answer any questions about this letter, please do not hesitate to contact me at the address above, or by phone at (832) 573-3760.

Sincerely,



Father Cedric Pisegna, C.P.

Enclosures (Exhibits A through H, Public Version of Petition)

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EXHIBIT A

LIST OF ALL RECORDED EPISODES OF "LIVE WITH PASSION!"

Father Cedric Pisegna Ministries

Live with Passion!

Series 1

- 1-1 Just a closer walk with Jesus
- 1-2 Life Teen Mass
- 1-3 The Power of God's Word
- 1-4 Trust is a Must Part 1
- 1-5 Trust is a Must Part 2
- 1-6 Be a Living Sacrifice
- 1-7 You Can Change
- 1-8 Change is Possible
- 1-9 The Joy of the Lord is Your Strength
- 1-10 The Person of the Holy Spirit
- 1-11 Catch the Wind of God's Spirit

Series 2

- 2-1 He Touched Me
- 2-2 Prayer (speaking)
- 2-3 Jesus Part 1
- 2-4 Jesus Part 2
- 2-5 Prayer (Listening)
- 2-6 Change is possible
- 2-7 You Can Change
- 2-8 Hope
- 2-9 Be Led by the Holy Spirit Part 1
- 2-10 Be Led by the Holy Spirit Part 2
- 2-11 St. Paul of the Cross/Vocations

Series 3

- 3-1 What a Difference Jesus Makes
- 3-2 Attitude Adjustment/Never Say "No Way"
- 3-3 Riders on the Storm Part 1
- 3-4 Riders on the Storm Part 2
- 3-5 Mind Renewal
- 3-6 Move a Move! Part 1
- 3-7 Make a Move! Part 2
- 3-8 Get More out of Mass Part 1
- 3-9 Get More out of Mass Part 2
- 3-10 Do It by Grace
- 3-11 Know Who You Are
- 3-12 Face Your Fears

Series 4

- 4-1 Live with Passion!
- 4-2 Chose Life, and Live
- 4-3 Saved by The Passion
- 4-4 Forgiven at the Cross
- 4-5 Be a "Now" Person
- 4-6 Seize Your Moment
- 4-7 Conversion: How to change
- 4-8 Cope Through Hope
- 4-9 The Holy Spirit: God's Love
- 4-10 Self Acceptance Through God's Spirit

Series 5

- 5-1 The Cross is the Crux
- 5-2 Happiness Part 1
- 5-3 Happiness Part 2
- 5-4 Prayer
- 5-5 Suffering Has Meaning
- 5-6 Flesh/Spirit Battle
- 5-7 The More Excellent Way, Love
- 5-8 The Holy Spirit and Passion

Series 6

- 6-1 Death of God's Faithful
- 6-2 From Fragmentation to Wholeness Part 1
- 6-3 From Fragmentation to Wholeness Part 2
- 6-4 From Fragmentation to Wholeness Part 3
- 6-5 From Fragmentation to Wholeness Part 4
- 6-6 From Fragmentation to Wholeness Part 5
- 6-7 From Fragmentation to Wholeness Part 6
- 6-8 From Fragmentation to Wholeness Part 7
- 6-9 From Fragmentation to Wholeness Part 8
- 6-10 From Fragmentation to Wholeness Part 9

Series 44

- 44-1-1 God's Spirit Makes Us Holy
- 44-1-2 The Spirit of Wisdom
- 44-1-3 Coping With Loss
- 44-2-1 You are an Eagle
- 44-2-2 God's Spirit Brings You Healing
- 44-2-3 Personal Change
- 44-2-4 God's Mercy & Forgiveness
- 44-3-1 Improving Your Relationship
- 44-3-2 Power of Positive Thinking
- 44-3-3 The Death Experience
- 44-3-4 A Living Hope

Episode 50 – Surrender to Jesus**Series 66**

- 66-1-1 Jesus Our Redeemer
- 66-1-2 Jesus Our Savior
- 66-1-3 Prayer: Know God Personally
- 66-2-1 Prayer: You Can know God
- 66-2-2 The Joy of the Lord: Your Strength
- 66-2-3 Francis: The Universal Saint

Series 77-Experience the Goodness of God

- 77-1 God's Love: God Loves You Unconditionally
- 77-2 Conversion: Turn Your Life Over to God
- 77-3 Eucharist: Understand the Mass
- 77-4 Family of God: You are a Part of God's Family
- 77-5 Death & Resurrection: Understand Your Suffering
- 77-6 Prayer: Have a Personal Relationship with God

Series 88-"Fr Bob, Sacred Storyteller"

- 88-1 Jesus: Have a Personal Relationship with Jesus
- 88-2 Love: How to Love Others
- 88-3 Sin: Deepen Your Relationship with God
- 88-4 Faith: Grow in Trust
- 88-5 Prayer: Energize Your Prayer Life
- 88-6 Suffering: Why do Bad Things Happen to Good People?

Series 99

- 99-1 Hope
- 99-2 Faith
- 99-3 Love
- 99-4 Reconciliation
- 99-5 Healing
- 99-6 The Holy Spirit
- 99-7 The Sacrament of Marriage
- 99-8 Quality Time
- 99-9 Death is a New Beginning
- 99-10 Surrender to God

Series 100

- 100-1 The Meaning of Christmas
- 100-2 Passion for God
- 100-3 You Can Pray
- 100-4 Come into a new Season
- 100-5 Forget What Lies Behind
- 100-6 Forget What Lies Behind Part 2
- 100-7 The Source of Passion
- 100-8 Experience Rebirth
- 100-9 The Spirituality of Surrender Part 1
- 100-10 The Spirituality of Surrender Part 2
- 100- 11 Thanksgiving

Series 110

- 110-1 The Cross of Jesus Saves You
- 110-2 Prayer Works!
- 110-3 Jesus Came for You
- 110-4 God is at Work in You
- 110-5 You are a Saint!
- 110-6 Scranton Interview
- 110-7 Dare to Believe
- 110-8 God will Guide Your Choices
- 110-9 Handling Stress
- 110-10 Managing Your Emotions
- 110-11 Coping with Loneliness
- 110-12 Growing Older has Meaning!
- 110-13 John Michael Talbot Interview Part 1 - DO NOT AIR
- 110-14 John Michael Talbot Interview Part 2 - DO NOT AIR

Series 125 - A Living Hope

- 125-1 The Stillness of Prayer
- 125-2 Transformation in the Journey: Part 1
- 125-3 Transformation in the Journey: Part 2
- 125-4 A Living Hope
- 125-5 The Secret to Personal Change Part 1
- 125-6 The Secret to Personal Change Part 2
- 125-7 The Healing Power of the Cross
- 125-8 The Holy Spirit: Dreams and Destiny Part 1
- 125-9 The Holy Spirit: Dreams and Destiny Part 2
- 125-10 God's Not Boring!
- 125-11/12 Faith is Forever-Interview - DO NOT AIR
- 125-13 Receive Eternal Life

Series 150

- 150-1 Faith the Opening Door
- 150-2 You Are the Church
- 150-3 Prayer is Dangerous Part 1
- 150-4 Prayer is Dangerous Part 2
- 150-5 You Can Make a Difference
- 150-6 Healing of Memories
- 150-7/8 Year of faith interviews
- 150-9 Kim Valdez talk
- 150-10 John Michael Talbot talk
- 150-11 John Michael Talbot interview
- 150-12/13 The Mass parts illustrated

Series 175 John Michael Talbot

- 175-1 John's Testimony Part 1
- 175-2 John's Testimony Part 2
- 175-3 The Jesus Prayer Part 1
- 175-4 The Jesus Prayer Part 2
- 175-5 Body, Soul and Spirit Part 1
- 175-6 Body, Soul and Spirit Part 2
- 175-7 A Walk Through the Liturgy Part 1
- 175-8 A Walk Through the Liturgy Part 2

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EXHIBIT B

RATE QUOTES FOR CLOSED CAPTIONING

"LIVE WITH PASSION!"



CMP Rate Card for Closed Captioning Services

- \$150.00 for HD finished file when full script provided
- \$250.00 for HD finished file when transcription services required

CMP is a subsidiary of Communications Corporation of America with television stations in Louisiana, Texas and Indiana
700 Saint John Street, Suite 300, Lafayette, LA 70501
337-237-1142



Caption Technologies, Inc.
348 Ascot Ridge Lane • Greer, SC 29650
Phone: (800) 676-0211 Fax: (864) 848-6009
E-Mail: vicki@captiontech.com

OPEN & CLOSED
CAPTION/SUBTITLE FILE RATES

<u>Length</u>	<u>Prep Rate</u>
0-2 minutes	100
5 minutes	150
10 minutes	200
15 minutes	225
20 minutes	250
→ 30 minutes	300
45 minutes	400
1 hour	500
1-1/4 hours	650
1-1/2 hours	800
1-3/4 hours	900
2 hours	1000
2-1/4 hours	1250
2-1/2 hours	1400
2-3/4 hours	1500
3 hours	1600

These rates are for caption preparation only. They do not include tape stock or encoding. Please provide script, if available.

Turnaround time for programs up to one-hour in length, excluding commercials, is approximately three to five working days. Commercials can be done in same-day turnaround.



12233 W. Olympic Blvd., Suite 152
 Los Angeles, CA 90064
 310-979-3500

Pre-Invoice

DATE	PRE-INVOICE #
10/2/13	WSP-11139

BILL TO
Father Cedric Pisegna Ministries

P.O. NO.	TERMS	DUE DATE	SALES REP	PROJECT
		10/2/13		Father Cedric Pisegna Minis

QUANTITY	DESCRIPTION	RATE	Total
30	FILE CREATION FOR CAPTIONING AND PREPARATION PER SHOW	11.00	330.00
0.5	FINAL CUT PRO QUICKTIME OUTPUT SD	250.00	125.00
0.5	SD CLOSED CAPTIONING ENCODING PER HR.	50.00	25.00
1	BETACAM 30 MINUTE STOCK PURCHASE	11.00	11.00T
	complete package per show		
		Subtotal	\$491.00
		Sales Tax (9.0%)	\$0.99
		Total	\$491.99

Phone #
310-979-3500

Web Site
www.wmgmedia.com

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EXHIBIT C

**VIDEO PRODUCTION PROPOSAL
TO CLOSED CAPTION 158
PREVIOUSLY RECORDED PROGRAMS**



Video Production Proposal

Prepared for: Fr. Cedric Pisegna
Prepared by: Buddy Englett, Pyro~Media
buddy@pyro-media.com

Monday, October 21, 2013

Proposal Number: 10/21/13/1

Thank you for choosing Pyro~Media. If you've come this far then it's obvious you appreciate quality and professional work- now it's time for us to deliver.

We've prepared this proposal with your project in mind. Please look over it carefully to make sure we understand your needs and that we're all on the same page.

With years of experience in developing professional, effectual productions, we're poised to offer you the best production available at a price that won't blow your budget. We're certain you'll agree, but if you have any questions about the budget please give us a call and we'll be happy to discuss it with you.

If you haven't already, you can see some samples of our work at www.pyro-media.com/samples.

Thank you for this opportunity to work with you on your project. We look forward to impressing you.

Pyro~Media

Your Pricing

Item	Description	Quantity	Unit Price	Cost
Closed Captioning	Closed Caption 158 programs	158	\$250.00	\$39,500.00
Beta SP Tape Duplication	158 programs duplicated to 30 minute Beta SP tapes for 8 stations	1264	\$80.00	\$101,120.00
DVD Duplication	158 programs duplicated to DVDs for 20 stations	3160	\$7.50	\$23,700.00
MiniDV Tape Duplication	158 programs duplicated to MiniDV tapes for 1 station	158	\$75.00	\$11,850.00
FTP	158 programs uploaded per FTP for 1 station	158	\$20.00	\$3,160.00
Shipping	Shipping & Handling	1	\$10,000.00	\$10,000.00
			Total	\$189,330.00

For detailed explanation of charges, please call and ask.

Remittance

Payment due as follows

1. 50% Deposit due upon agreement of proposal
2. 50% due on completion of final product

This proposal is good for 30 days.



Approval

Your Signature

By signing below you give your agreement with the project as outlined, your consent to proceed with the project as defined by this proposal and to remit all payments as indicated.

Customer Signature of Approval

Date

Thank you for this opportunity to work with you,

Pyro-Media

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EXHIBIT F

LETTERS REJECTING CLOSED CAPTIONING

FINANCIAL ASSISTANCE



Media Services
Agency

14171 Chambers Road
Tustin, California 92780-7091
Phone: [714] 665-2153
Fax: [714] 832-0645

CLOSED CAPTIONING FOR THE TBN NETWORKS

The United States Congress passed the Telecommunications ACT of 1996 ("ACT"), the ACT mandates all programmers who provide programs or program materials to a television station or network, must now include closed-captioning for the hearing impaired on all new programs after January 1, 1998. All programs accepted and placed on TBN or The Church Channel must be closed-captioned.

The Trinity Broadcasting Network does not provide closed captioning for any programmers airing on any of it's networks. It is the responsibility of any and all programmers to provide their own closed captioning.

Sincerely

Jay Jones
Media Services Director
Trinity Broadcasting Networks



WSMH
G-3463 W. Pierson Rd., Flint, MI 48504

T 810.785.8866 F 810.785.9056 wsmh.com

August 21, 2012

Julie Esterle
Office Manager
The Mass Media Group
P.O. Box 8881
Greenville, SC 29604

Dear Julie:

WSMH does not provide closed captioning services for paid programmers like Father Cedric Pisegna's program, Live with Passion.

It is up to each advertiser to have their programs produced with closed captioning before submitting to our station.

Please let Father Cedric know we do appreciate his business and look forward to working with him again in 2013.

Sincerely,

WSMH-FOX66

Printed on Recycled Paper
100% Recycled Paper
50% Post Consumer Waste
www.fox66.com



August 23, 2012

To Whom It May Concern:

Neither KVHP FOX29, nor NVHP LCCW provide closed captioning services for the paid programs we air on these stations. It falls on the advertiser to provide closed captioning.

129 W. PRIEN LAKE RD.

LAKE CHARLES, LA.

70601

337.474.1316

Fax 337.310.0322

watchfox29.com

cwlakecharles.com

Sincerely,

A handwritten signature in black ink that reads "Mandi Burk". The signature is written in a cursive style with a large, stylized "M" and "B".

Mandi Burk

National Sales Coordinator

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EXHIBIT G

**PRODUCER LETTER REGARDING
CLOSED CAPTIONING FOR RELIGIOUS PROGRAMMING**



The Mass Media Group

October 17, 2013

To whom it may concern,

This letter is in regard to the FCC's request for information regarding Father Cedric Pisegna Ministries. The ministry is unable to obtain video programming assistance and additional sponsorships for closed captioning.

This is due to the nature of religious programming as it is not possible to find outside sponsors of closed captioning. Faith based programming is limited to the donations provided by local church members.

Fr. Cedric Pisegna is a missionary priest and has no congregation to support him and he is supported solely by his donors.

Kind regards,

Jared Wilkins

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EXHIBIT H

AFFIDAVIT

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AFFIDAVIT

The State of ILLINOIS

County of COOK

BEFORE ME, the undersigned Notary, SUSAN R. ARVANITIS, on this 25th day of OCTOBER, 2013 personally appeared Father Cedric Pisegna, C.P., known to me to be a credible person and of lawful age, who being by me first duly sworn, on his oath, deposes and says:

I declare and affirm under penalty of perjury that the statements made in the enclosed letter to the FCC dated October 25, 2013 and all attachments thereto are true and correct to the best of my knowledge, information and belief.

Father Cedric Pisegna, C.P.
Father Cedric Pisegna, C.P. (Signature)

10-25-13
Date

Address: 430 Bunker Hill Road
Houston, TX 77024

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 25th day of OCTOBER, 2013.

(Notary Seal)

Susan R. Arvanitis
Signature of Notary Public

SUSAN R. ARVANITIS
Name of Notary Public - please print or type

My commission expires: SEPTEMBER 3, 2015

