



CG Docket 06-181

WILKINS & BOUTON, LLC
ATTORNEYS AT LAW

ROBERT W. WILKINS
rwilkins@wilkinsbouton.com

WILLIAM I. BOUTON
wbouton@wilkinsbouton.com

October 24, 2013

Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-C438
445 12th Street, SW
Washington, DC 20554

Received & Inspected

OCT 29 2013

FCC Mail Room

RE: Faith at Work Ministry, Inc.
CGB-CC-1062
Supplemental Information

Dear Mr. Holberg:

The purpose of this letter is to respond to your September 26, 2013 letter requesting supplemental information to Faith At Work Ministry, Inc.'s ("FAWM") Petition for Exemption from the Federal Communications Commission's ("FCC's") closed captioning requirements. As requested, please find the enclosed information:

- Name of the programming for which an exemption is requested. Faith at Work Ministry, Inc.
- The nature and cost of the closed captions for the programming. FAWM conducts fifty-two programs a year, all of which would require closed captioning under the FCC's closed captioning requirements. FAWM has sought closed captioning quotes, some of which have been previously provided. Recent quotes are included as "Attachment A". The lowest quote FAWM has received to date for closed captioning programming is \$100.00 per program, or \$5200.00 per year. In addition, FAWM would be required to purchase equipment between \$1500.00 and \$2500.00
- The impact of captioning on your programming activities. If closed-captioning of FAWM is mandated, the financial resources available to the ministry simply would be inadequate to sustain its broadcast. All of FAWM's funding comes from individual donors, and therefore, its funding is not guaranteed year to year. The addition of significant costs such as closed captioning will only further jeopardize the ministry, as it has limited resources to begin with.
- Your financial resources. As stated above, FAWM's financial resources are 100% funded by individual donors.

Dr. W. Carey Hedgpeth

April 18, 2012

Page 2

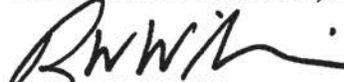
- Attached as "Attachment B" please find the financial information requested.
- Video programming distributor assistance. Much of this requested information has been previously provided to the FCC. FAWM is supported by donations from friends of FAWM; therefore, it cannot afford the weekly cost of closed captioning. FAWM has sought closed-captioning assistance from its video programming distributor and all stations that air its programming. All of FAWM's requests have been denied. Additionally, FAWM has sought additional sponsorship sources and other outside sources of revenue for captioning, and these efforts have not successfully produced assistance. See Attachment C.
- Additional sponsorships. FAWM, by the nature of its ministry, does not solicit funds or sponsorships; therefore, these funding streams are not available to the ministry.
- Your type of operations. FAWM is a nonprofit 501(c)(3) ministry. Its purpose is to grow faithful obedience to the Great Commission (Matthew 28:19-20) through the preaching and teaching of the gospel of Jesus Christ to unbelievers and believers alike. FAWM conducts its teachings as a television ministry to several local broadcast stations and satellite radio for the spiritual benefit of the community. The ministry is supported by donations from friends of FAWM; therefore, it cannot afford the weekly cost of closed captioning. FAWM does not solicit funds or sponsorships; therefore, these funding streams are not available to the ministry.
- Affidavit or declaration. See "Attachment C".

As much of the information requested in the September 26, 2013 letter has been previously provided, I am incorporating all previous submissions to the FCC concerning this matter. If you need additional information, please do not hesitate to contact me.

Thank you for your consideration in this matter.

Sincerely,

WILKINS & BOUTON, LLC



Robert W. Wilkins

Enclosures

cc: Dr. Carey Hedgpeth

"Attachment A"

Robert Wilkins

From: W. Carey Hedgpeth
Sent: Wednesday, October 16, 2013 11:02 AM
To: Robert Wilkins
Subject: Fwd: Closed Captioning

Begin forwarded message:

From: <argylemultimedia@charter.net>
Date: October 10, 2013 4:48:53 PM EDT
To: "W. Carey Hedgpeth" <careyhedge@bellsouth.net>
Subject: Re: Fwd: Closed Captioning

Dr. Carey,

CPCweb charges between \$200 to \$300 per 30 min. program (mpeg2 HD, which is the format I use for WYCW). CCMaker charges are closer to what I would charge (\$150 per 30 min. program), yet they currently don't offer (the advertisement states they are working on it) closed captioning for mpeg2 files. Both programs seem to rely mostly on digital or analogue tape, which I haven't used in 5 years. Additionally, since I have to encode the program to mpeg2 with 5 different data rates and 3 different field rates, I'm not sure if either of the below programs or other CC business's wouldn't charge extra per mpeg2 file that I send (for 1 show). CPCweb does offer software by which I could this in house. I imagine their cost is at least the same and perhaps more than what WGGG suggested. I'll do a little research see.

If we have to do cc for FAW I'd rather keep it in house. Simpler. And I think long term, cheaper.

thanks Dr. Carey,
Cliff

From: W. Carey Hedgpeth
Sent: Thursday, October 10, 2013 2:35 PM
To: Cliff Williams
Subject: Fwd: Closed Captioning

For your information . WCH

Begin forwarded message:

Robert Wilkins

From: W. Carey Hedgpeth
Sent: Wednesday, October 16, 2013 11:05 AM
To: Robert Wilkins
Subject: Fwd: Closed Captioning

Begin forwarded message:

From: "Bill Crews" <bill@selectbroadcasting.org>
Date: October 10, 2013 12:17:34 PM EDT
To: <careyhedge@bellsouth.net>
Subject: Closed Captioning

Hello Carey,

We charge \$150 to close caption a 30 minute program. Here are a couple of other places that do it so you can compare pricing.....

Let me know if you need anything else.....

Bill

<http://www.ccmaker.com/>

http://www.cpcweb.com/caption-service/rates/CPC_caption_rates.pdf

W. Carey Hedgpeth
<http://www.FAWMinistry.org>

"Attachment B"

Financial Statements

of

Faith at Work

As of December 31, 2012 & December 31, 2011

See Accountant's Report

Daniel T. Jones III, CPA, PA
904 East Washington Street
Greenville, SC 29601
Telephone: 864-370-2864

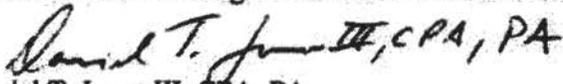
To the Board of Trustees of
Faith at Work
Greer, SC

I have compiled the accompanying statement of assets, liabilities, and net assets-cash basis of Faith at Work (a nonprofit organization) as of December 31, 2012 and December 31, 2011, and the related statement of revenues, expenditures, and other changes in net assets-cash basis for the year then ended. I have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with the cash basis of accounting.

Management is responsible for the preparation and fair presentation of the financial statements in accordance with the cash basis of accounting and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

My responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

Management has elected to omit substantially all of the disclosures and the statement of cash flows required by generally accepted accounting principles. If the omitted disclosures and the statement of cash flows were included in the financial statements, they might influence the user's conclusions about the Company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.


Daniel T. Jones III, CPA, PA

October 18, 2013

Faith at Work
Statement of Assets, Liabilities, and Fund Balance
Years Ended December 31, 2012 and 2011

ASSETS

	December 31, 2012	December 31, 2011
CURRENT ASSETS		
Checking - BB&T	\$ 30,938.34	\$ 34,351.29
BB&T - Romania Missions	7,781.32	5,933.32
Grand South Bank MMkt	<u>96,537.81</u>	<u>103,724.04</u>
Total Current Assets	<u>137,257.47</u>	<u>144,008.65</u>
LONG-TERM INVESTMENTS		
Oppenheimer Funds #0571	50,330.76	0.00
Oppenheimer Funds #4479	31,571.41	30,478.90
American Realty Capital	0.00	35,000.00
ARC #2739	<u>50,530.98</u>	<u>0.00</u>
Total Long-Term Investments	132,433.15	65,478.90
PROPERTY AND EQUIPMENT		
Automobiles	20,970.00	20,970.00
Equipment	1,050.00	1,050.00
Less: Accumulated Depreciation	<u>(1,050.00)</u>	<u>(1,050.00)</u>
Net Property and Equipment	<u>20,970.00</u>	<u>20,970.00</u>
TOTAL ASSETS	<u>\$ 290,660.62</u>	<u>\$ 230,458.55</u>

See Independent Accountant's Compilation Report

Faith at Work
Statement of Assets, Liabilities, and Fund Balance
Years Ended December 31, 2012 and 2011

LIABILITIES AND FUND BALANCE

	December 31, 2012	December 31, 2011
CURRENT LIABILITIES	0.00	0.00
LONG-TERM LIABILITIES	0.00	0.00
FUND BALANCE		
Fund Balance	230,458.55	188,820.36
YTD Excess Revenues (Deficit)	60,202.07	41,638.19
Total Fund Balance	<u>290,660.62</u>	<u>230,458.55</u>
TOTAL LIABILITIES AND FUND BALANCE	<u>\$ 290,660.62</u>	<u>\$ 230,458.55</u>

See Independent Accountant's Compilation Report

Faith at Work
Statement of Revenues & Expenditures
Years Ended December 31, 2012 and 2011

	12 Months Ended December 31, 2012	12 Months Ended December 31, 2011
Revenue		
Donations	\$ 199,984.68	\$ 209,965.07
Total Revenue	<u>199,984.68</u>	<u>209,965.07</u>
Operating Expenditures		
Advertising	0.00	351.27
Auto Expense	1,033.39	4,216.92
Bank Service Charges	19.00	169.00
Contributions	10,965.00	4,780.00
Dues & Subscriptions	549.81	275.00
Insurance	1,307.37	1,121.50
Health & Life Insurance	4,457.64	4,457.64
Library, Books, Journals	0.00	539.99
Ministry	0.00	32,251.78
Broadcasting Expense	97,303.84	82,877.40
Miscellaneous	178.53	0.00
Office Expense	5,340.20	3,163.72
Professional Fees	2,876.00	920.00
Repairs and Maintenance	0.00	190.00
Rent	6,000.00	9,000.00
Salaries: General	20,500.00	24,500.00
Taxes: Other	74.00	65.00
Telephone	738.38	644.82
Travel	0.00	1,428.96
Total Operating Expenditures	<u>151,343.16</u>	<u>170,953.00</u>
Revenue Less Expenditure	<u>48,641.52</u>	<u>39,012.07</u>
Other Revenue		
Interest Income	1,613.41	999.65
Capital Gain Income	6,942.55	17.90
Dividends	2,826.06	380.59
Other Income	178.53	1,227.98
Total Other Revenue	<u>11,560.55</u>	<u>2,626.12</u>
Net Revenue	<u>\$ 60,202.07</u>	<u>\$ 41,638.19</u>

See Independent Accountant's Compilation Report

Affidavit of Dr. Carey Hedgpeth – Faith at Work Ministry, Inc.

PERSONALLY APPEARED before me, Dr. W. Carey Hedgpeth, who being duly sworn and upon penalty of perjury, states the following is true and correct:

My name is Dr. W. Carey Hedgpeth. I am a resident of Greenville, South Carolina and am the founder and president of Faith at Work Ministry, Inc. I am providing the following information as a supplement to our Petition for Exemption in CGB-CC-1062 in response to the September 26, 2013 letter received from the FCC.

The information contained in Mr. Wilkins' attached letter is truthful and accurate. Included in this supplement are Faith at Work Ministry, Inc.'s financial statements from my accountant. These statements are a true and accurate depiction of our financial status.

Faith at Work Ministry, Inc. has sought closed-captioning assistance from our video programming distributor and all stations that air our programming. All of our requests have been denied.

Additionally, Faith at Work Ministry, Inc. has sought additional sponsorship sources and other outside sources of revenue for captioning, and these efforts have not successfully produced assistance.

Faith at Work Ministry, Inc. is respectfully requesting the FCC grant us an exemption from its closed captioning rules, as our modest revenues could not support the large expense of closed captioning. We simply could not sustain the significant cost of closed captioning and therefore respectfully request an exemption from the closed-captioning rules.

Thank you for your consideration.


Dr. W. Carey Hedgpeth

SWORN TO ME THIS 24th day of October 2013


Notary Public for South Carolina

My Commission expires on 1/18/15