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October 28, 2013

ACCEPTED/FILED

FEB 27 2014

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

Federal Communications Commission  
Office of the Secretary

**RE: Case Identifier: CGB-CC-1228  
Response to Request for Supplemental Information**

Dear Mr. Secretary:

Please accept this correspondence and attached documentation in response to the request for supplemental information directed to the Delaware Standardbred Owners' Association dated September 26, 2013.

**Name of the programming for which an exemption is requested:**

**Response:** Post Time

**The Nature and cost of the closed captions for the programming:**

**Response:**

Recent closed captioning estimates for a 30 minute show with a two day turnaround or less ranged from \$237 to \$340 per episode. The show airs 50 (fifty) weeks per year. Closed captioning fees range from \$11,850 to \$17,000 annually depending on the closed captioning contractor chosen.

Exhibit 1 & Exhibit 2

These estimates do not take into account additional fees that the editor would charge to manage the process of getting the edited version of the show to the closed captioning contractor and providing the final product to the TV station.

**The impact of captioning on your programming activities:**

**Response:** Requiring the Post Time show to be offered with closed captioning is economically burdensome. This is a low budget 30 minute program that airs weekly to a local audience. The cost is approximately \$2,700 per episode. Thus the cost of closed captioning would increase the cost by 8% - 13% of the current production costs.

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There is one DSOA employee who produces the show. The economic downturn over the last few years has resulted in decreased interest from potential advertisers. If an exemption is not granted, the show will likely be discontinued and the sole DSOA employee who produces the show will likely be laid off.

**Your financial resources:**

**Response:** Financial statements for the DSOA are prepared by Raymond F. Book & Associates PA, CPAs of Dover, Delaware. Documentation from 2010, 2011, and 2012 are attached to this correspondence.

Exhibit 3

**Video programming distributor assistance:**

**Response:** The DSOA has sought assistance from the TV broadcasting station (WBOC) who airs the Post Time program. Such assistance was requested in 2012 and 2013. WBOC has responded that it does not have a closed captioning machine nor is one in the budget as of October 28, 2013. WBOC has a closed captioned function for news scripts only. The Post Time show is not scripted as it includes impromptu interviews with horse professionals and enthusiasts and actual races called by the track announcer as the races proceed.

Exhibit 4 & Exhibit 5.

**Additional Sponsorships:**

**Response:** The DSOA has sought additional sources of revenue to defray the cost of closed captioning from Harrington Raceway and Casino, Dover Downs, and Ocean Downs, LLC where DSOA members race their horses but the requests have been rejected.

Exhibit 6, Exhibit 7, and Exhibit 8.

**Your type of operations:**

**Response:** The DSOA is a non profit entity organized under Section 501 (c) of the Internal Revenue Code. It is a trade association that represents the horsemen and women who compete at Delaware's two harness racetracks, Dover Downs and Harrington Raceway and Casino. Some of the members also compete at the Maryland track, Ocean Downs, LLC. The DSOA has approximately 650 members and is governed by a Board of Directors elected by the members.

Post Time is a 30 minute show produced by one DSOA staff member that airs weekly on Sunday mornings on WBOC in Salisbury, Maryland. The sole purpose of the show is to promote interest in harness racing. It includes interviews with drivers, trainers, and other horse professionals and enthusiasts as well as actual footage of important races each week. Human interest stories about horsemen and women are also regularly included. Producing Post Time is just one way that the DSOA promotes the sport of harness racing.

**Affidavit:**

**Response:** Affidavit of the Executive Director of the DSOA is attached.

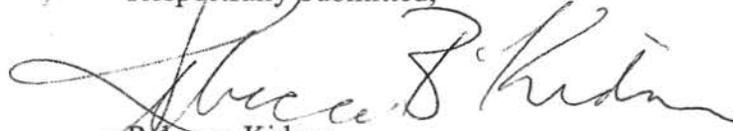
Exhibit 9.

The DSOA hereby reiterates its request for an exemption from closed captioning of its Post Time show because it would be economically burdensome and place the show in jeopardy of being cancelled if required. In addition to the economic burden, the logistics of adding closed

captioning would make it nearly impossible to produce utilizing the same editor and the same broadcasting station and in this rural area, there are no other broadcasting choices.

Post Time typically includes interviews and footage shot weekly at the various tracks on which DSOA members race. The show also includes actual footage of the most important races in any given week shot by TV control at the racetrack. TV control at the track has no legal obligation to release the above referenced footage to the DSOA for its Post Time show but in the spirit of promoting the sport, it does so. The most important races are typically run on Monday nights and the tapes of individual races are not available to the DSOA staff until one or two days after a race. The editor requires 2 ½ days to put the show together and one night to express mail the tape to WBOC by Friday for Sunday airing. Turn around for adding the closed captioning is 1 – 2 days. There simply is not enough time to produce the show given these time requirements. As such, the DSOA requests that a closed caption exemption be granted for the Post Time show.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Rebecca Kidner".

Rebecca Kidner  
Attorney at Law

RBK:cja

Attachments

## LIST OF EXHIBITS

1. Exhibit 1 Estimate of closed captioning from CPC
2. Exhibit 2 Estimate of closed captioning from Caption Labs
3. Exhibit 3 DSOA Financial Documents for 2012, 2011, and 2010
4. Exhibit 4 2012 Correspondence from WBOC indicating closed captioning is not available for the Post Time show
5. Exhibit 5 2013 e-mail from WBOC indicating closed captioning is not available for the Pose Time show
6. Exhibit 6 2012 Correspondence from Harrington Raceway and Casino rejecting a request for funding for closed captioning of the Post Time show
7. Exhibit 7 2012 Correspondence from Dover Downs Hotel and Casino rejecting a request for funding for closed captioning of the Post Time show
8. Exhibit 8 2012 Correspondence from Ocean Downs, LLC rejecting a request for funding for closed captioning of the Post Time show
9. Exhibit 9 2013 Affidavit of Salvatore DiMario, Executive Director of the DSOA

## CPC Post Production Closed Captioning & Subtitling Rates

[Order form](#)

[service@cpcweb.com](mailto:service@cpcweb.com)

[How to send a proxy video to CPC](#)

301-738-8487

### e-Captioning Workflow

1. Upload a small proxy video file
2. CPC transcribes & creates caption files for your video file
3. A caption file is emailed to you
4. You lay down the caption file to tape with your NLE

### Transcription Only

2 day turnaround	\$4/min
5 day turnaround	\$3/min

### Caption/Transcription

3 Day Turnaround			5 Day Turnaround			10 Day Turnaround		
Video length (in minutes)	Caption Only	Transcript & Caption	Video length (in minutes)	Caption Only	Transcript & Caption	Video length (in minutes)	Caption Only	Transcript & Caption
Spot*	\$100	\$100	Spot*	\$100	\$100	Spot*	\$95	\$95
5	\$140	\$155	5	\$100	\$110	5	\$95	\$105
10	\$180	\$210	10	\$125	\$145	10	\$115	\$135
15	\$220	\$265	15	\$150	\$180	15	\$135	\$165
20	\$260	\$320	20	\$175	\$215	20	\$155	\$195
30	\$340	\$430	30	\$225	\$285	30	\$195	\$255
45	\$460	\$595	45	\$300	\$390	45	\$255	\$345
60	\$580	\$760	60	\$375	\$495	60	\$315	\$435
75	\$700	\$925	75	\$450	\$600	75	\$375	\$525
90	\$820	\$1,090	90	\$525	\$705	90	\$435	\$615
105	\$940	\$1,255	105	\$600	\$810	105	\$495	\$705
120	\$1,060	\$1,420	120	\$675	\$915	120	\$555	\$795

**The e-Captioning Workflow**  
e-Captioning can be used for virtually all captioning tasks SD or HD using the NLE hardware you already have.

**Converting captioned TV video to captioned web video**  
CPC will help you comply with the new web closed captioning law.

\*The above rates include one standard caption file type. HD caption files are an additional \$50

\*We offer **special rates** for 30 minute & 60 minute **serial programs**. Please call for details.

\***Spots** means less than 5 minutes: Up to 3 spots - \$100 each. More than 3 spots - \$75 each

See below for additional services and supported files

## Special Services

### Encoding, Authoring and Conversion Charges

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#### Additional Services

#### Encoding Captions/Subtitles to Tapes

	20 min	30 min	60 min
Beta SP	\$25	\$35	\$60
DVCam	\$20	\$30	\$50
DVCPRO	\$30	\$40	\$60
Digi Beta	\$40	\$55	\$80
HDCam	\$75	\$150	\$200
XDCAM	\$60	\$80	\$160

*Includes: tape stock, one color print label & insert.*

*If you provide stock, deduct 15% from the above price.*

#### HD Caption Files

Mpeg2 Program Stream	\$50
Avid Advanced Authoring Format	\$50
Quicktime DTV 608/708	\$50
DVCPRO HD (DV 100)	\$50

*The above fees are in addition*

*to standard transcription & captioning fees.*

#### Caption file Conversion

SD to SD	\$100
SD to HD	\$100
HD to HD	\$100

#### DVD/Flash Authoring

Basic DVD authoring (No menu design)	\$75
Flash authoring	\$75

See below for supported formats.

## CPC Captioning & Subtitling Service

works with the following formats and systems

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### Physical Formats

Beta SP  
DigiBeta  
DVCAM  
DVCPRO25  
DVCPRO50  
HDCAM  
XDCAM

### Web Formats

QuickTime (mov, smil/txt)  
iTunes / iPod / iPhone (m4v)  
Windows Media Player (sami/asx)  
Microsoft Silverlight (xml)  
Adobe Flash (Timed Text xml, cue points xml)  
Captionate Flash (xml)  
RIT Flash (xml)  
JW Flash Player (Timed Text xml)  
Hulu (smi)

### Blu-ray Authoring Systems

Sony Blu-print (xml/png)  
Sonic Scenarist (xml/png)  
NetBlender DoStudio (dost/png)

### Caption and Subtitle Formats

SCC  
Cheetah .cap  
Cheetah .asc  
Ultech .ult  
Dual-language .ult  
CPC .cap  
CPC .onl  
Telestream FlipFactory (scc)  
FlipFactory subtitles (pac)  
Rhozet Carbon (scc)  
DV2000/ITV Injector subtitles

### DVD Authoring Systems

Apple DVD Studio Pro (scc, son/tif, stl, stl/tif)  
Adobe Encore (txt, fab/tif)  
Sonic Scenarist (scc, sst/tif)  
Sonic Producer (txt)  
Sonic ReelDVD (son/tif)  
Sonic Fusion/Creator (son/tif, cc)  
Roxio DVDit (txt)  
Spruce Maestro (scc, stl, stl/tif)  
Pinnacle Impression (txt/bmp)  
Sony DVD Architect (txt)

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Avid Advanced Authoring Format	\$50
Quicktime DTV 608/708	\$50
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*The above fees are in addition  
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Microsoft Silverlight (xml)  
Adobe Flash (Timed Text xml, cue points xml)  
Captionate Flash (xml)  
RIT Flash (xml)  
JW Flash Player (Timed Text xml)  
Hulu (smi)

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FlipFactory subtitles (pac)  
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Sonic ReelDVD (son/tif)  
Sonic Fusion/Creator (son/tif, cc)  
Roxio DVDit (txt)  
Spruce Maestro (scc, stl, stl/tif)  
Pinnacle Impression (txt/bmp)  
Sony DVD Architect (txt)

- Who We Are
- What We Do
- How We Do It
- Contact us

## Our Pricing

We believe knowing how much you're going to pay should be hassle free. Our most common pricing packages are shown below. Look them over and see which fits your needs best. And of course, if your project requires some special details, we will be glad to help with those too! Just click on the Project Quote button to the right.

Package:	Economy	Standard	Premier
<b>PROJECT</b>			
Turnaround (Business Days)	5	Next	Custom
Same Day Service Available	No	+\$75	✓
Setup Fee	None	None	None
Quicktime & AVI Master File Accepted	No	✓	✓
Minimum Episode Commitment	8	None	None
<b>TRANSCRIPTION</b>			
Verbatim Transcript Included	✓	✓	✓
Finished Transcript Word Document	No	✓	✓
<b>CAPTION DISPLAY</b>			
Roll Up Captioning	✓	✓	✓
Pop-On Captioning	No	+\$75	✓
Screen Position	Fixed	Movable	Movable
Languages	English	English & Spanish	Any
<b>ENCODING</b>			
E-Caption (Tapeless) Delivery	✓	✓	✓
HD Vide Encoding	No	No	✓
<b>BILLING &amp; SUPPORT</b>			
Net 30 Billing (Upon Credit Approval)	No	✓	✓
Technical Support	Basic	Advanced	Advanced
After Hours Support	No	✓	✓
100% Satisfaction Guarantee	✓	✓	✓
<b>* Price Per Episode *</b>	<b>\$157</b>	<b>\$237</b>	<b>Call For Price</b>

*\*Prices are for closed captioning, up to 30 minutes in length.  
Extra services like tape duplication and shipping are not included.*

**Project Quote Let's talk...**

**EXHIBIT 2**

**DELAWARE STANDARD BRED OWNERS' ASSOCIATION**  
**STATEMENT OF ACTIVITIES**  
**FOR THE YEARS ENDED SEPTEMBER 30, 2012 AND 2011**

	<u>2012</u>		
	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>Total</u>
<b><u>Revenues, Gains and Other Support</u></b>			
Track Contributions	\$ 514,316	\$ -	\$ 514,316
Track and Member Insurance Contributions	3,168,765		3,168,765
DSOA Pension Income		348,000	348,000
Membership Dues	24,597		24,597
Other Income	1,312	5,916	7,228
<b><u>Total Revenues, Gains and Other Support</u></b>	<u>3,708,990</u>	<u>353,916</u>	<u>4,062,906</u>
<b><u>Expenses</u></b>			
<b><u>Management and General</u></b>			
Condominium Fees	2,997		2,997
Depreciation	4,142		4,142
Dues and Subscriptions	10,137		10,137
Equipment Damage Expense	525		525
Flowers and Donations	3,224		3,224
Members Insurance	3,008,932		3,008,932
Office Insurance	6,839		6,839
Member Benefit Programs	106,887		106,887
Office Supplies	14,817	1,205	16,022
Payroll Taxes	20,309		20,309
Postage	3,345		3,345
Professional Services	46,185		46,185
Salaries	285,198		285,198
Retirement Plan Contributions - Simple Plan	8,104		8,104
Taxes and Licenses	2,055		2,055
Income Tax Expense	203		203
Telephone	4,816		4,816
Travel, Lodging and Meeting Expenses	20,018		20,018
Utilities	2,933		2,933
Other Expenses	452		452
<b><u>Total Expenses</u></b>	<u>3,552,118</u>	<u>1,205</u>	<u>3,553,323</u>
<b><u>Excess Revenue over Expenses</u></b>	156,872	352,711	509,583
<b><u>Other Income and Expenses</u></b>			
Investment Income	681		681
Realized Gain (Loss)- Merrill Lynch	-		-
Increase (Decrease) in Life Ins Cash Value		54,047	
<b><u>DSOA Pension Plan:</u></b>			
Investment Income		37,036	37,036
Distributions to members		(68,670)	(68,670)
Realized and Unrealized Gain (Loss) on Investments		355,055	355,055
<b><u>Net Other Income and Expenses</u></b>	<u>681</u>	<u>377,468</u>	<u>324,102</u>
<b><u>Changes in Net Assets</u></b>	157,553	730,179	887,732
<b><u>Net Assets Beginning of Year</u></b>	<u>189,456</u>	<u>2,363,187</u>	<u>2,552,643</u>
<b><u>Net Assets End of Year</u></b>	<u>\$ 347,009</u>	<u>\$ 3,093,366</u>	<u>\$ 3,440,375</u>

**DELAWARE STANDARD BRED OWNERS' ASSOCIATION**  
**STATEMENT OF ACTIVITIES**  
**FOR THE YEARS ENDED SEPTEMBER 30, 2011 AND 2010**

	<u>2011</u>		
	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>Total</u>
<b><u>Revenues, Gains and Other Support</u></b>			
Track Contributions	\$ 482,741	\$ -	\$ 482,741
Track and Member Insurance Contributions	2,824,352		2,824,352
DSOA Pension Income		358,500	358,500
Membership Dues	28,372		28,372
<b>Total Revenues, Gains and Other Support</b>	<u>3,335,465</u>	<u>358,500</u>	<u>3,693,965</u>
<b><u>Expenses</u></b>			
<b><u>Management and General</u></b>			
Condominium Fees	2,997		2,997
Depreciation	4,408		4,408
Dues and Subscriptions	11,299		11,299
Equipment Damage Expense	3,475		3,475
Flowers and Donations	3,751		3,751
Members Insurance	3,431,693		3,431,693
Office Insurance	7,338		7,338
Member Benefit Programs	105,712		105,712
Office Supplies	13,240		13,240
Payroll Taxes	21,705		21,705
Postage	3,227		3,227
Professional Services	44,425		44,425
Salaries	292,478		292,478
Retirement Plan Contributions - Simple Plan	8,175		8,175
Taxes and Licenses	2,024		2,024
Income Tax Expense	187		187
Telephone	4,573		4,573
Travel, Lodging and Meeting Expenses	12,291		12,291
Utilities	3,675		3,675
<b>Total Expenses</b>	<u>3,976,673</u>	<u>-</u>	<u>3,976,673</u>
<b><u>Excess Revenue over Expenses</u></b>	<b>(641,208)</b>	<b>358,500</b>	<b>(282,708)</b>
<b><u>Other Income and Expenses</u></b>			
Investment Income	633		633
Realized Gain (Loss)- Merrill Lynch	(9)		(9)
<b>DSOA Pension Plan:</b>			
Investment Income		49,592	49,592
Distributions to members		(39,017)	(39,017)
Realized and Unrealized Gain (Loss) on Investments		(167,713)	(167,713)
<b>Net Other Income and Expenses</b>	<u>624</u>	<u>(157,138)</u>	<u>(156,514)</u>
<b><u>Changes in Net Assets</u></b>	<b>(640,584)</b>	<b>201,362</b>	<b>(439,222)</b>
<b><u>Net Assets Beginning of Year</u></b>	<u>830,040</u>	<u>2,161,825</u>	<u>2,991,865</u>
<b><u>Net Assets End of Year</u></b>	<u>\$ 189,456</u>	<u>\$ 2,363,187</u>	<u>\$ 2,552,643</u>

	<u>2010</u>		
	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>Total</u>
<b><u>Revenues, Gains and Other Support</u></b>			
Track Contributions	\$ 454,009	\$ -	\$ 454,009
Track and Member Insurance Contributions	2,861,519		2,861,519
DSOA Pension Income		364,500	364,500
Membership Dues	28,430		28,430
<b><u>Total Revenues, Gains and Other Support</u></b>	<u>3,343,958</u>	<u>364,500</u>	<u>3,708,458</u>
<b><u>Expenses</u></b>			
<b><u>Management and General</u></b>			
Condominium Fees	3,496		3,496
Depreciation	5,366		5,366
Dues and Subscriptions	12,299		12,299
Equipment Damage Expense	2,585		2,585
Flowers and Donations	5,345		5,345
Members Insurance	2,693,613		2,693,613
Office Insurance	7,574		7,574
Member Benefit Programs	101,362		101,362
Office Supplies	20,652	160	20,812
Payroll Taxes	21,016		21,016
Postage	1,482		1,482
Professional Services	42,645	525	43,170
Salaries	281,780		281,780
Retirement Plan Contributions - Simple Plan	7,648		7,648
Taxes and Licenses	2,092		2,092
Income Tax Expense	304		304
Telephone	5,031		5,031
Travel, Lodging and Meeting Expenses	22,581		22,581
Utilities	3,487		3,487
<b><u>Total Expenses</u></b>	<u>3,240,358</u>	<u>685</u>	<u>3,241,043</u>
<b><u>Excess Revenue over Expenses</u></b>	103,600	363,815	467,415
<b><u>Other Income and Expenses</u></b>			
Investment Income	961		961
Realized Gain (Loss)- Merrill Lynch	-		-
<b><u>DSOA Pension Plan:</u></b>			
Investment Income		33,065	33,065
Distributions to Members		(75,848)	(75,848)
Realized and Unrealized Gain (Loss) on Investments		171,952	171,952
<b><u>Net Other Income and Expenses</u></b>	<u>961</u>	<u>129,169</u>	<u>130,130</u>
<b><u>Changes in Net Assets</u></b>	104,561	492,984	597,545
<b><u>Net Assets Beginning of Year</u></b>	<u>725,479</u>	<u>1,668,841</u>	<u>2,394,320</u>
<b><u>Net Assets End of Year</u></b>	<u>\$ 830,040</u>	<u>\$ 2,161,825</u>	<u>\$ 2,991,865</u>

**SEE ACCOMPANYING NOTES AND ACCOUNTANT'S REPORT**



Delaware Standardbred Owners Association  
830 Walker Square  
Dover, DE 19904  
Attention: Sal DiMario

July 31, 2012

Dear Mr. DiMario,

WBOC does not have "closed captioning" services available at our facility other than what takes place through our news scripting.

If I can be of further assistance please let me know.

Sincerely,

Dave Speicher  
General Sales Manager  
WBOC / FOX21

1729 N. Salisbury Blvd.  
Salisbury, MD  
(410) 749-1111  
FAX (410) 749-2391

1839 S. Dupont Hwy.  
Dover, DE 19901  
(302) 734-9262  
FAX (302) 734-3674

One The Square  
Milton, DE 19968  
(302) 684-8982  
FAX (302) 684-8237

From: Dave Speicher <dspeiche@wboc.com>  
To: Heather <pacinspice@aol.com>  
Sent: Mon, Oct 28, 2013 11:28 am  
Subject: Heather Vitale - Post Time

Heather,

At this time, we have not invested in a Closed Captioning machine and don't have it budgeted. The system that we use for news scripts handles the Closed Captioning for news scripts only. We don't accept Paid Programming unless it is Closed Captioned or the advertiser has a waiver from the FCC.

Dave Speicher  
General Sales Manager  
WBOC / FOX21  
443-880-9100  
[dspeicher@wboc.com](mailto:dspeicher@wboc.com)

No virus found in this message.

Checked by AVG - [www.avg.com](http://www.avg.com)

Version: 2013.0.3426 / Virus Database: 3222/6787 - Release Date: 10/28/13

10/28/2013

EXHIBIT 5



Delaware Standardbred Owners Association  
Sal Dimario – Executive Director  
830 Walker Square  
Suite 11-2  
Dover, DE 19904

July 26, 2012

Dear Mr. Dimario,

This letter is in response to your request for funding for closed captioning of the 'Post Time' television program. While we remain committed to promoting the show, we are unable to provide additional funding at this time. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Sparacino".

Matt Sparacino  
Asst. GM of Racing  
Harrington Raceway

**DOVER DOWNS<sup>®</sup>**  
HOTEL & CASINO

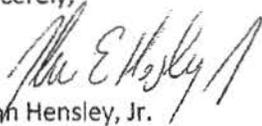
August 13, 2012

Delaware Standardbred Owners' Association  
830 Walker Square  
Suite 11-2  
Dover, DE 19904

Dear Sal,

Dover Downs has committed to a certain level of funding for the "Post Time" program. Dover Downs will not be increasing its funding for the program.

Sincerely,



John Hensley, Jr.  
Sr. Director – Horse Racing and Sports

EXHIBIT 7

# OCEAN DOWNS, LLC

P.O. Box 11 • 10218 Racetrack Road • Berlin, MD 21811  
410.641.0600 (phone) • 410.641.2711 (fax)

July 30, 2012

To: Sal Dimario  
From: Peter Szymanski  
Re: Closed captioning

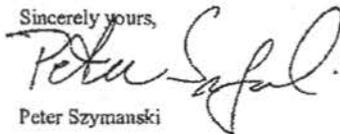
Dear Sal:

Please note that Ocean Downs is unable to help with the additional financial needs associated with the Post Time TV show of which we are a part. We currently budget \$6300 for less than two months of TV production and air time.

In our current situation, we do not have the financial wherewithal to add closed captioning costs to our budget. We simply do not have the money.

Thank you for your understanding and consideration.

Sincerely yours,



Peter Szymanski

GM  
Ocean Downs/ Racing



OCEAN DOWNS  
RACETRACK

OCEAN DOWNS  
BEVERAGE, INC.

RACING SERVICES, INC.



CAMBRIDGE  
TURF CLUB

CAMBRIDGE PLAZA  
BEVERAGE

**AFFIDAVIT OF SALVATORE DIMARIO**

STATE OF DELAWARE    )  
  )  
COUNTY OF KENT        )        SS:

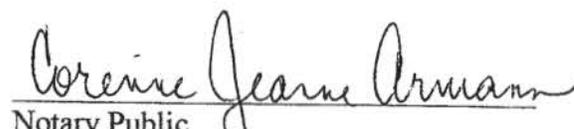
BE IT REMEMBERED that on this 28th day of October, 2013, personally appeared before me, a Notary Public for the State and County aforesaid, Salvatore DiMario, known to me personally to be such, and did depose and say that:

1. He is the Executive Director of the Delaware Standardbred Owners' Association (DSOA);
2. The DSOA is a non profit entity described in Section 501 (c) of the Internal Revenue Code;
3. He oversees the day to day operations of the DSOA and the employee (Heather Vitale Moffett) who produces the Post Time Show;
4. He has reviewed the financial information attached hereto and affirms that these are true and accurate financial statements of the DSOA prepared by Raymond F. Book & Associates, P.A. Certified Public Accountants with offices in Dover, DE;
5. He contacted Dover Downs, Harrington Raceway & Casino, and Ocean Downs, LLC in 2012 to request financial help with closed captioning for the Post Time show and was rejected by each of the three entities;
6. He received letters of rejection to his requests for financial assistance with closed captioning from each of the above referenced entities on July 26, 2012, July 30, 2012, and August 13, 2012; copies of which are attached hereto;
7. He contacted each of the three entities in 2013 to renew his request for financial assistance with closed captioning and was again rejected by all three entities;
8. He contacted the TV broadcaster of Post Time, WBOC, and was informed on July 31, 2012 that it did not have closed captioning services available for the Post Time show (letter attached);
9. He has been informed by DSOA employee, Heather Vitale Moffett, that WBOC confirmed on October 28, 2013, that it still does not have the capabilities of providing closed captioning services for the Post Time show (e-mail attached);

10. He has reviewed the proposed pricing for closed captioning for the weekly 30 minute Post Time show and asserts that the show will most likely be cancelled if a closed captioning exemption is not granted; and
11. The facts contained in this Affidavit are true and correct to the best of his knowledge and belief.

  
SALVATORE DIMARIO

SWORN TO AND SUBSCRIBED the day and year aforesaid.

  
Notary Public  
My Commission Expires 9/26/14

