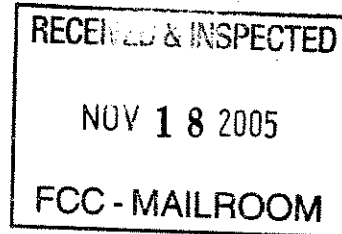


NIAGARA MINISTRIES
2074 Lockport Road, Niagara Falls NY 14304

November 09, 2005

CGB-CC-0009



FCC
Attn: Secretary's Office
Closed Captioning
445 12th Street SW
Washington, DC 20554

RE: REQUEST FOR EXEMPTION FROM COMMISSION'S CLOSED CAPTIONING RULES

Niagara Ministries, a Church Body of approximately 90 people located here in Niagara Falls NY produce a 30 minute Television Bible teaching program titled "Digging In with Joanne Bunce" which airs 5 times a week on one network. Our mandate from the beginning has been to make the Word of God available and known to as many as possible via radio and television, but the costs of Closed Captioning would at this time be a significant expense as outlined in our attached Affidavit of Costs.

The purpose of this petition is to request an exemption from the Closed Captioning Requirements, under Section 79.1 of the Commissioner's rules. Niagara Ministries believe our program qualifies for exemption for the following reasons:

Part 79.1 – Section (F)

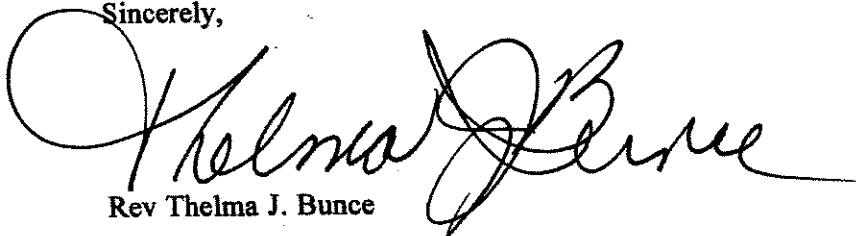
Compliance would impose an undue burden to Niagara Ministries for the following reasons:

1. The programs would have to be sent to an outside source for captioning. This added production cost would make production unaffordable as well as impact the ability to meet air-date deadlines.
2. Niagara Ministries is a donor supported, non-profit organization with total income from all sources of \$219,105.93. (The FCC Report and Order on Captioning: Summary states under Exemptions "Providers with less than \$3,000,000 in gross annual revenues will not be required to spend any money to caption programming.")

Again we respectfully request that Niagara Ministries be exempted from the closed captioning-requirement for the above stated reasons. We may be reached at:

Niagara Ministries
Att: Rev Thelma J. Bunce
2074 Lockport Road,
Niagara Falls, NY 14304
716 297-2871

Sincerely,



Rev Thelma J. Bunce

Enclosure: Affidavit of Costs

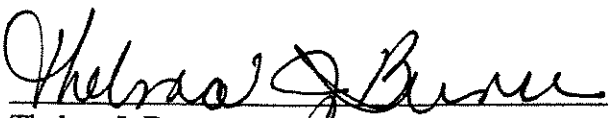
RECEIVED & INSPECTED
NOV 18 2005
FCC - MAILROOM

Affidavit of Costs


I Thelma J. Bunce, President/Pastor of Niagara Ministries, by my signature affixed to this document, do hereby make the following statement of fact and affirm:

- 1. Total income of Niagara Ministries, including all sources \$219,105.93.
- 2. The amount paid Christian Television Network for the 5 day a week airing of our Television show is \$74,084.00 per year.
- 3. All other costs involved in the production and distribution of the Television show are performed by myself and members of the church as volunteers with no charge.
- 4. Captioning costs would average \$230.00 per program = \$59,800 per year if Out Sourced. (Infinity Concepts) This cost far exceeds any of our in-house production costs, equipment and supplies, and could be a real deterrent in our ability to deliver a quality product to the public.

I now affix my signature to these affirmations:


Thelma J. Bunce
President/Pastor

The foregoing was subscribed and sworn to me, a Notary Public, of the State of New York, County of Niagara this 9th day of NOVEMBER 2005.


Notary Public

ROBIN A. ZOLDOWSKI
Notary Public - State of New York
NO. 01204634198
Qualified in Niagara County
My Commission Expires 2/28/07