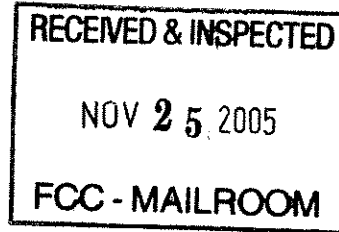


CGB-CC-0012

November 17, 2005

Federal Communications Commission  
Office Of The Secretary  
445 12<sup>th</sup> Street SW  
Washington D.C. 20554



Attention: Closed Captioning Petition For Exemption

To Whom It May Concern:

We respectfully request an exemption from closed captioning for our television program.

We produce a weekly half-hour talk show called "Reno's Backstage Pass" highlighting entertainment in the Reno area. We videotape and edit the show on Wednesdays. It airs Friday mornings on KOLO-TV in Reno and KSPX-TV in Sacramento.

According to the exemptions noted in the "FCC Consumer Facts" brochure for closed captioning, we believe we qualify for the following reasons:

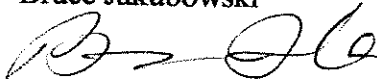
- (1) It is a locally produced, non-news program with no repeat value, because all the information provided in the show becomes outdated the day after it airs.
- (2) The total gross revenue for the program for the calendar year 2005 will be less than \$75,000, far under the \$3 million guideline.
- (3) Considering the small amount of gross revenue, combined with the cost of buying the half-hour blocks of air time and production costs, coupled with the tight deadlines from taping to airing, we believe supplying captions would result in an undue burden as a program provider.

Please review this petition for exemption from closed captioning.

If you need any more information, please feel free to contact me.

Thank you for your time and attention.

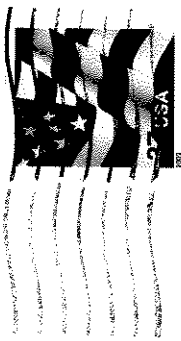
Bruce Jakubowski



S & B Productions  
3417 Ridgecrest Dr.  
Reno, NV 89512

Phone: (775) 674-3195 fax: (775) 674-1817

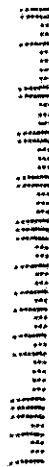
S & B Productions  
3417 Ridgcrest Dr.  
Reno, NV 89512



RECEIVED & INSPECTED  
NOV 25 2005  
FEDERAL COMMUNICATIONS COMMISSION - MAIL ROOM

Federal Communications Commission  
Office Of The Secretary  
445 12<sup>th</sup> Street SW  
Washington D.C. 20554

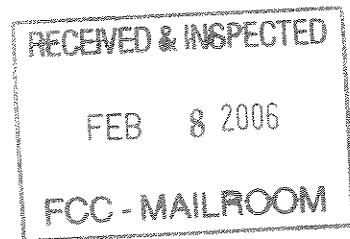
ATTN: CLOSED CAPTIONING EXEMPTION 20554-0000



S & B  
PRODUCTIONS

January 20, 2006

Amelia Brown, Disability Rights Office  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington D.C. 20554



Attention: Closed Captioning Petition For Exemption (reference: CGB-CC-0012)

Dear Ms. Brown,

Here is the additional information you requested (in your letter dated December 22, 2005) in our petition for an exemption from closed captioning for our television program. We believe supplying captions would result in an undue burden.

To review, we produce a weekly half-hour talk show called "Reno's Backstage Pass" highlighting entertainment in the Reno area for that particular weekend. It is a hobby mostly for fun, and as you will see, very little profit. We've been doing this program the same way since September, 1995.

Because we have to wait for many of the entertainers to get to Reno, We videotape and edit the program on Wednesdays. We ship or deliver it to the two stations so they can review it and place it in their systems on Thursday. It airs Friday mornings on KOLO-TV in Reno and KSPX-TV in Sacramento. The program has no repeat value, because the information and interviews contained in the program are for that weekend and become immediately outdated.

Supplying captions would result in undue burden in two ways:

- (1) LOGISTIC: We would not be able to get the captions on the program and delivered to the stations in time. We can send it overnight to the caption company on Wednesday. The caption company could do the work and send it back out to the stations on Thursday. But, of course, it would not arrive at the stations until Friday morning. It would be too late for the stations to review the program before airing. And, that assumes no glitches (weather, machines malfunctions, etc.) in any step of the process.

# S & B PRODUCTIONS

(2) FINANCIAL: We are a very small budget, local show. I am the host, producer AND editor. Considering the small amount of gross revenue, combined with all of our expenses and tight deadlines from taping to airing, we believe supplying captions would result in an undue burden:  
(see A,B,C,D attached)

Weekly Sponsor Income: \$1,250.00

Weekly Expenses:

KOLO-TV air time:	\$400.00 (A)	
KSPX-TV air time:	450.00 (B)	
Production costs:	127.00 (C)	
Tapes, shipping	75.00	
TOTAL:		\$1,052.00

Weekly Profit (before captions): \$ 198.00

Cost Of Captioning: (lowest estimate: D)

Captioning:	\$ 185.00
Master Tape:	75.00
2 dubs	50.00
Shipping:	50.00
TOTAL:	360.00

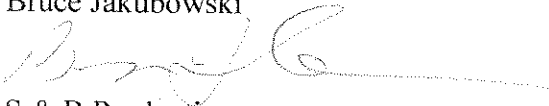
TOTAL WEEKLY LOSS: -\$162.00

As you can see, even if we adjust our taping and/or air dates, our small program just cannot afford the expense of supplying captions. Therefore, we respectfully request an exemption from closed captioning.

If you need any more information, please feel free to contact me.

Thank you for your time and attention.

Bruce Jakubowski



S & B Productions  
3417 Ridgcrest Dr.  
Reno, NV 89512

Phone: (775) 674-3195 fax: (775) 674-1817

3417 Ridgcrest Drive • Reno, Nevada 89512  
Phone: (775) 674-3195 • Fax: (775) 674-1817



4850 Ampere Drive  
 Post Office Box 10000  
 Reno, NV 89510-0005  
 Phone: 775-858-8888 Fax: 775-858-8855

206980  
 BACKSTAGE PASS  
 S & B PRODUCTIONS  
 3417 RIDGECREST DRIVE  
 RENO NV 89512

REP...: LAURA BOREN  
 SLSP.: BACKSTAGE PASS  
 ADV.: S & B PROD/  
 PROD: S & B PROD/

DATE 12/25/05 6980-00034

ORDER TYPE	STANDARD
INVOICE NO.	51210139
PAGE	4
BROADCAST MONTH	DECEMBER
SCHEDULE DATES	12/27/04-12/23/05
BILLING INSTRUCTIONS	STANDARD BROADCAST CALENDAR

REF#:   
 DESC:

SCHEDULE				ACTUAL BROADCAST				RECONCILIATION				
DESCRIPTION	PRICE	RT/SS#	PER	DATE	DAY	TIME	LENGTH	M/G FOR	PRODUCT DESCRIPTION	PRICE	REMARKS	DR/CR
30-12P	400.00	4	4	12/21	WE	02:59P	:10		AIRS 12/23 & 12/30	.00		
				12/22	TH	02:34P	:10		AIRS 12/23 & 12/30	.00		
				12/22	TH		:10		AIRS 12/23 & 12/30	.00	NOT AVAILA PRE/NO MG	
				12/23	FR		:10		AIRS 12/23 & 12/30	.00	NOT AVAILA PRE/NO MG	
				12/23	FR	12:00A	:10		AIRS 12/23 & 12/30	.00		
				12/02	FR	11:30A				400.00		
				12/09	FR	11:30A				400.00		
				12/16	FR	11:30A				400.00		
				12/23	FR	11:30A				400.00		
18 TOTAL UNITS ACTUAL GROSS BILLING 1,600.00 AGENCY COMMISSION .00 NET DUE 1,600.00										Debits Credits SUB-TOTALS TOTAL RECONCILING ITEMS .00		

We warrant that the actual broadcast information shown on this invoice was taken from the program log.

PERIOD COST  
 PER CONFIRMATION 1,600.00

on official \_\_\_\_\_  
 by public \_\_\_\_\_

CLIENT INVOICE

TERMS: NET 30 DAYS

RFPRISE FORM NO. KOLOIC94V2



**New Day**  
MARKETING

923 Olive Street  
Santa Barbara, CA 93101  
805-965-7833 fax: 805-965-1284

**Schedule for S & B Productions (SBP)**

1/9/2006

Refer to Inv. # 9325

<u>Station</u>	<u>Market</u>	<u>Day</u>	<u>Date</u>	<u>Time</u>	<u>Client Cost</u>	<u>Title</u>	<u>AE</u>
✓ KSPX	Sacramento, CA	Fri	1/27/06	10:30 am	\$450.00	Reno Backstage Pass #536	BE
					Daily Subtotal:	\$450.00	
					Weekly Subtotal:	\$450.00	



4850 Ampere Drive  
 Post Office Box 10000  
 Reno, NV 89510-0005  
 Phone: 775-858-8888 Fax: 775-858-8855

INV : 51220497  
 DATE: 12/25/05  
 PAGE: 1  
 SPON: BACKSTAGE PASS  
 PROD: S & B PROD/PROD  
 PER : 11/06/02 - T.F.N.  
 CONT: 6980-00030 STANDARD  
 SLSP: LAURA BOREN

100210  
 S & B ADVERTISING AGENCY  
 3417 RIDGECREST DRIVE  
 RENO NV 89512

EST#:

DATE	DESCRIPTION	EXTENSION
12/30/05	LOCAL AGENCY PRODUCTION REV DECEMBER PRODUCTION PROD INV 3523	602100 1 @ 150.00 150.00

GROSS INVOICE AMOUNT	150.00
LESS AGENCY COMMISSION	22.50
NET INVOICE AMOUNT DUE	127.50



4100 W. Burbank Blvd 3<sup>rd</sup> Floor Burbank CA 91505 (818) 848-6500 FAX: (818) 450-0516

TM

**CONFIDENTIAL PROPOSAL**  
*For*  
**TRANSCRIPTION & CAPTION SERVICES**  
*Prepared for*  
**SNB PRODUCTIONS**  
**January 5, 2006**

**CLOSED CAPTIONING**

Standard Roll-Up-format

\$185.00 per 30 minutes  
\$350.00 per 60 minutes  
\$ 585.00 per 90 minutes

*(Includes Electronic Delivery of  
Scripts & cc files on disk)*

**ADDITIONAL CHARGES:**

- Master Beta Cam \$ 75/ per 30 minutes  
Closed Caption Encoding and Conversion  
Dubbing \$25.00 per Tape

Total Cost Per 30 minute program: \$285 each

• **REAL-TIME CAPTIONING**

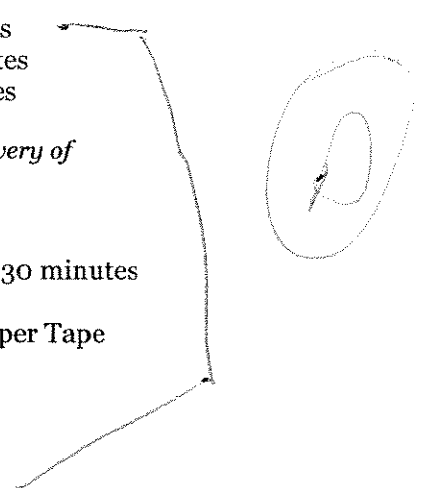
Closed Caption Service for Broadcast – Real-time \$100.00 per hour  
*Includes: News, Sports, Kids and Telethons*  
Segment Cut-in \$ 50.00 per each  
**Segments 30 minute or less**

**OTHER AVAILIBLE SERVICES:**

- Language Translation of transcripts
- Subtitles
- CD and DVD media duplication
- FTP site and digital file transfer for media content

Prices effective through December 31, 2006

Roni Hall  
Sales Consultant  
**The Transcription Company**  
rhall@transcripts.net  
818-848-6500 x111





**AFFIDAVIT OF BRUCE JAKUBOWSKI**

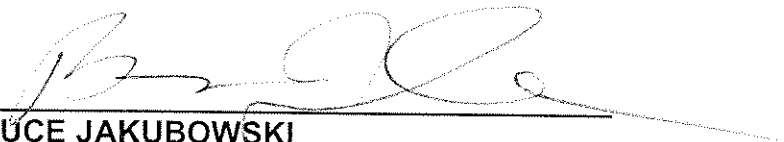
STATE OF NEVADA        )  
  )ss.  
COUNTY OF WASHOE    )

**BRUCE JAKUBOWSKI**, of Reno, Nevada, being first duly sworn,  
deposes and says:

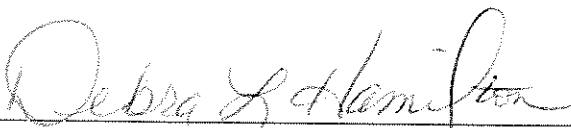
(1) That he has prepared the foregoing letter from *S & B Productions*, dated January 20, 2006, addressed to the *Federal Communications Commission* and knows the contents thereof, including Exhibits A, B, C and D; and the same is true of his own knowledge, except as to those matters therein stated on information and belief, and as to those matters he believes it to be true.

(2) That said documents (a) are in accordance with the books and records of affiant; (b) are complete and correct in all material respects; (c) fairly represent the financial condition of *S & B Productions* at the respective dates therein indicated; and (d) have been prepared in accordance with accounting principles applied on a consistent basis with prior years.

DATED this 27 day of January, 2006.

  
\_\_\_\_\_  
**BRUCE JAKUBOWSKI**

SUBSCRIBED and SWORN to before me  
this 27<sup>th</sup> day of January, 2006.

  
\_\_\_\_\_  
Notary Public

