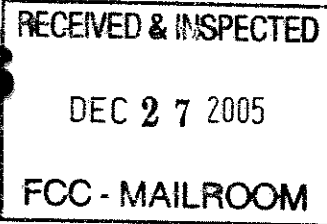


CCB-02-0044



P.O. Box 65036
Virginia Beach, VA 23467
Phone (757) 420-2625



Federal Communications Commission
Attention: Amelia Brown
445 12th Street S.W.
Washington, D.C. 20554

OVERNIGHT DELIVERY

RE: Petition for Exemption of Closed Captioning on Basis of Undue Burden standard contained in Section 79.1(f) of the rules.

Dear Ms. Brown:

Joy Ministries which helps hurting women in the inner city of Norfolk, Virginia currently airs a weekly 30-minute television program called "Joy in the Morning". The purpose of this petition is to request exemption of Closed Captioning for our program based on the undue burden standard contained in Section 79.1(f) of the Commission's rules.

1. The nature and cost of Closed Captioning our programs outside will run our ministry approximately \$300-\$360 per half hour program. This is based on two different quotes from closed captioning companies that were contacted, Texoma Captions in Dallas, Texas and CPC Computer Prompting & Captioning Co. in Rockville, MD. Both of these facilities were contacted by our distribution company, (see attached).
2. The total financial revenue to this ministry in 2004 was \$381,403 and the estimated cost for Closed Captioning will be \$22,360 per year to the ministry including tape stock and shipping and handling. Therefore the financial impact on this ministry will be significant potentially affecting several ministry programs we have in the works helping inner city women and their children.
3. Although this will pose a significant burden upon our financial resources as we go into 2006, we will begin a capital resource campaign in order to help us cover these costs as we do wish to comply with the closed captioning rules. We are researching various donor sources to help us with this and estimate it will take us at least six-eight months or more to raise the necessary funds needed to close caption our program.
4. Joy Ministries does not own or operate any its own video production or editing equipment or production facilities all work is done outside. As needed we rent a small facility to produce our program and those costs are covered from donations given to the ministry for that purpose. This production facility we use does not have Closed Captioning capabilities.

I do hereby agree that the above information and the attached information are correct and true. Thank you for your consideration for this exemption for our program.

Respectfully,

Danette Crawford
President
Joy Ministries

NEWTON MEDIA

Newton Media Associates, Inc.
A media management company
824 Greenbrier Parkway, Suite 200
Chesapeake, Virginia 23320
757-547-5400 Fax 757-547-7367
e-mail: info@newtonmedia.com
www.newtonmedia.com



December 21, 2005

Rev. Danette Crawford, President
Joy Ministries
1446 Kempsville Rd
Suite 203
Virginia Beach, Virginia
23464

Dear Danette,

I have received information from the following companies concerning the cost of Closed Captioning your television program, "Joy in the Morning".

The approximate cost based on my discussions and information will run about \$300-\$360 per half-hour program. This will include off-line production and encoding per half hour and you will need to provide tape stock and shipping.

CPC Computer Prompting & Captioning Co.

1010 Rockville Pike, Suite 306
Rockville, MD 20852, USA

Phone: 301-738-8487
Fax: 301-738-8488
TTY: 301-738-8489
Toll Free: 800-977-6678

Pop-on mode: \$7/min. of video
+ \$150 setup fee
Roll-up mode: \$5/min. of video
+ \$150 setup fee

(You provide transcript & blank tape)

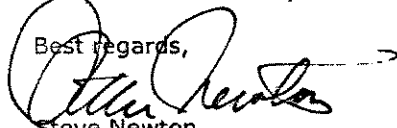
.....
Add \$3/min. of video if CPC transcribes.

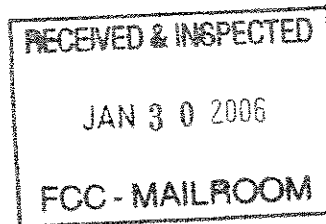
Texcoma Captions
Dallas, Texas

I contacted this company and was told that it is a little cheaper if they can do several (8-10) programs at a time. They have an Engineer who would set up the equipment and do the captioning onto your tape stock. The off-line cost is approximately \$300 per half hour plus the cost of your tape and shipping and handling costs.

Please let me know if you have any questions concerning this matter.

Best regards,


Steve Newton
President
Newton Media



Amelia Brown, Disabled Rights Office
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Ref: CGB-CC-0044

Dear Amelia,

I am replying to your letter to me dated January 10, 2006, concerning our petition dated December 27, 2005, before the FCC seeking an exemption for the closed captioning requirements for the program "Joy in the Morning" based on the undue burden standard set forth in the Commission's Rules.

You indicated two things were incomplete in our petition as follows:

1. Not Supported by Affidavit. Please note that I have attached the Affidavit which supports my statements I made in my petition dated December 27, 2005.
2. We did not explain reasonable alternatives to captioning, if any. My response to this point is that on our television programs we do include all scriptures and have them subtitled and in open text format that comes up on the full screen. We also make a copy of the sermon available to viewers who request them. In addition to this, we would be willing to put a line of text on the screen in each program that would direct the hearing impaired to email or write us for a copy of the sermon notes which would be emailed or mailed accordingly.

I hope this answers your questions and comments concerning our petition. Please let me know if you have other questions and I would be pleased to answer them.

Thank you.

Sincerely,

Rev. Danette Crawford
President of Joy Ministries

AFFIDAVIT

I, Rev. Danette Crawford, President of Joy Ministries, Virginia Beach, Virginia, Do hereby make oath before the undersigned and note that the statements contained in my petition to the FCC dated December 27, 2005, regarding Exemption from Closed Captioning of our television program "Joy in the Morning" based on undue burden rule are true and correct to the best of my knowledge and ability.

State of Virginia

City of Virginia Beach, Virginia, to-wit

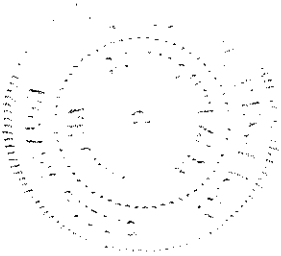
This day personally appeared before me the undersigned Rev. Danette Crawford, President of Joy Ministries located in Virginia Beach, Virginia, who made oath before me in my jurisdiction the foregoing statements, by her are true and correct to the best of her knowledge and ability.

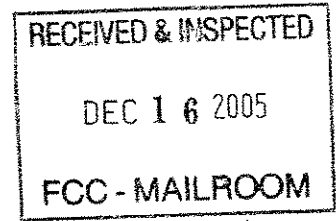
Danette J. Crawford, President 1-26-06
Name, Title Date

Signed before me on this date 1/20, 2006

Jeresa H. Ridgway
Notary Public

Commission Expires MY COMMISSION EXPIRES JUNE 30, 2009





Commission's Secretary, Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
9300 East Hampton Drive
Capitol Heights, MD 20743

OVERNIGHT DELIVERY

RE: Petition for Exemption or Extension of Closed Captioning on Basis of Undue Burden

Dear Secretary of the Commissioner:

Joy Ministries which helps hurting women in the inner city of Norfolk, Virginia currently airs a weekly television program called "Joy in the Morning". We just received notice, Tuesday, December 13, concerning the requirements as of January 1, 2006, that all of our programs need to be Closed Captioned. We are not prepared to accomplish this within the time frame neither financially or technically.

Joy Ministries takes in far less than \$3 million per year in donations and the cost of closed captioning will cause an undue financial hardship upon our resources at this time. Several closed captioning companies have quoted us as much as \$300 per half hour program to do the dubbing and encoding.

However, we intend to comply with the Closed Captioning Rules, we just need some time in order to make this happen. We are currently in the process of requesting the support necessary to assist us in the effort to produce a closed captioned program. We estimate it will take approximately 3-6 months to acquire the funds necessary to comply and request this amount of time in order to get all our programs closed captioned.

Per this letter I would like to file an exemption or extension for that period of time to enable us to close caption our television program.

Thank you for your consideration.

Respectfully,


Rev. Danette Crawford
President & Founder
Joy Ministries