

CAB-CC-0074

Global Media Marketing

1032 W. Taft Ave. Orange, CA 92865

RECEIVED & INSPECTED
DEC 23 2005
FCC - MAILROOM

December 21, 2005

To whom it May Concern:

This is Petition for exemption to the 'Closed Captioning' requirements on the basis of undue burden.

Global Media Marketing, Inc. is a small production facility in Orange, CA (1032 W. Taft Ave., Orange CA 92865). We produce several local paid programming/Infomercials (28:30 in length) for the 'Automotive Retail' industry. These automotive infomercials are updated on a weekly basis and the turn around time is about 36 hours from shoot to station. The product (retail vehicle) is sold on a daily basis and the program/advertisement content (whether print, radio, or TV) must be updated within 72 hours after selling the vehicle in order to comply with the regional/state advertising guidelines.

These shows run on local cable access as well as local independent and local affiliated broadcast networks.

Our production cost for a full 28:30 infomercial is at an average of \$1,000 per show with a turn around time (as stated above) averaging 36 hours. To 'Close Caption' a show would require a minimum of a 6 to 7 day turn around and an additional expense of approx. \$500 per show. By the time the 'CC' tape is then sent back to us and then to the station we are out of compliance with our regional/state advertising guidelines. Each and every show does comply with the advertising guidelines set forth by the state with fully visible disclaimers and full graphics on every vehicle and fully visible disclaimers and full graphics on any price/payment related item.

All in all – making each show 'Close Captioned' would push our clients out of compliance with their advertising guidelines, raise the productions costs 50%, and most importantly cause a major financial burden on my company as the requirement of staffing up, purchasing new equipment/software, and the sure loss of several clients due to the costs, turn around time, and the fact that their product would then be out of compliance with local advertising guidelines.

I have, for several months, explored my options in purchasing the "CC" equipment and software but, once in place, that as well would push my clients out of compliance not to mention the financial burden on my company for purchasing the proper equipment / software (approx \$20,000) and the staffing necessary to keep it up to speed.



As far as an alternative to 'Close Captioning' – I feel that all the information is on the screen as the host(s) notes (Price, Payment, Down, Equipment, Legal, etc...) on every vehicle. *Please see enclosed DVD for reference of a sample show.*

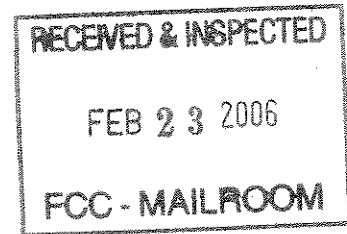
I am sure in time as technology continues to improve there will be a much faster and cheaper way from me to implement 'CC' into these shows.. ie. Voice dictation software and the complete switch of the stations from analog to digital. The fact that the station requires analog tape format already means that I have to convert my digital programming onto Beta format (analog) then add an extra step to encode the 'CC' onto that Beta tape.

Thank you for your time and consideration.

Christian Holiday
GMM
714-974-5074

February 17, 2006

Federal Communications Commission
Attention: Amelia Brown, Disabilities Rights Office
445 12th Street, SW
Washington, DC 20554
Case number- CGB-CC-0074



Re: Request for Full Exemption from Closed Captioning Requirements

Dear Ms. Brown,

Global Marketing Media, Inc. is responding to your request for further information regarding the Petition requesting exemptions from closed captioning requirements under the Commission's Rules, 47 C.F.R. § 79.1 based on the undue burden standard and regulations as it pertains to our "Automotive Retail" productions only.

INTRODUCTION AND OVERVIEW

Global Media Marketing, Inc. is a small production facility, which was started in late 2003. Our primary goal is to provide our automotive clients with a cost effective timely infomercial for the used car market.

THE NATURE AND COSTS OF THE CLOSED CAPTIONING FOR THE PROGRAMMING

We have included the pricing structure for the vendor we use for closed captioning of our other productions. We have found them to be competitively priced.

Below is the breakdown of costs per production:

Pop-Ups-\$195.00
Encoding-\$120.00
Dubs-\$42.25
Shipping-\$60.00
Rush Fees-\$315.00
Transcribing-\$250.00
<hr/>
Total cost -\$982.25

Currently our production costs are \$900.00 per show. As you can see this increases the cost of the production by 109%. This will increase the cost to the Dealer by double which will result in our company losing business. This would of course add financial burden to our company. Along these lines we have been made aware that a competitor that provides the same services has been given exemption status and is therefore able to keep costs down (JCR, Foothill Ranch, California). Attached is the break down of costs for Transcription and Caption Services for your perusal. Also included is the Profit and Loss Statement for 2004. As detailed the Net Loss was

<\$485.09> for 2004. While the company continuously seeks additional sources of revenue from gaining new clients, the process is slow and not guaranteed.

OTHER IMPACT ON THE PROGRAM OWNER

In addition to the direct financial burden that the closed captioning requirement would impose on the Company, it also impacts production in several ways that are detrimental to the Company and our Automotive Clients.

1. *Program Scheduling.* As mentioned previously, we produce several local paid programming/Infomercials (28:30 in length) for the “Automotive Retail” industry. These are updated on a weekly basis and the production time currently is about 3 days from shoot to station. In addition to the financial burden the time restraints are of particular importance because closed captioning these productions would result in the timeline outlined below.

Currently we are able to turn around a show in 3 days:

1 day to shot

1 day to edit

1 day to ship

3 day turn around

The following is the time line for closed captioning:

1 day transcribing

1 day shipping to Closed Captioning Company

3-5 days for a rush order (which they will all need because of the nature of the automotive business

1 day dubbing

1 day to ship back

8-10 day turn around time with closed captioning

This is problematic because the stations require the tape 3 days before the airdate. The above schedule eliminates the ability to comply with the stations. Additionally are concerns regarding Vehicle Code Restrictions described below.

2. *Vehicle Code Restrictions.* The timeline is important in the automotive industry specifically because of the Vehicle Codes, which dictate advertising practices within this industry. Concerns have surfaced about being in compliance with the Vehicle Code particularly since the automotive shows that we produce are for used cars. The delay due to closed captioning would leave the Car Dealer advertising a car that had sold a week prior, which is clearly outside the 72-hour guideline. This would be problematic, and potentially result in legal problems. (Refer to Vehicle Codes 11713.c and 11713.b (1)(A)).

3. *Format.* It has been brought to our attention that in fact by closed captioning these productions the ad would be less effective for the hearing impaired as all pertinent information is shown in the infomercial by way of graphics and camera angles. The commentary adds no value to the content other than to highlight what has already been “shown”.

As shown by this Petition, the Commission should grant exemption for our “Automotive Retail” industry productions because in this case requiring closed captioning would create undue burden. The costs of captioning would be excessively high, and would substantially increase the Company’s operating loss. As importantly as mentioned above there are other considerations to take into account. If more information is needed, please contact the undersigned at the address listed below.

Respectfully submitted,

GLOBAL MEDIA MARKETING, INC

By _____

Christian Holiday
President

1032 W. Taft Ave.
Orange, CA 92865
714-974-5074
Christian@glblmedia.com

GLOBAL MEDIA MARKETING, INC.

BALANCE SHEET
For The 12 Months Ended 12/31/04

ASSETS

Current Assets

Bank of America	\$	20,472.14	
Accounts Receivable		500.00	
Employee Advances		1,250.00	
Loan to Shareholder - Chris		237.92	
Total Current Assets			\$ 22,460.06

Fixed Assets

Furniture & Fixtures		400.00	
Equipment		87,491.14	
Less Accum. Depreciation		-57,236.64	
Total Fixed Assets			30,654.50

Other Assets

Deposits - Rent		1,235.00	
Total Other Assets			1,235.00

TOTAL ASSETS

\$ 54,349.56

LIABILITIES and EQUITY

Current Liabilities

F.I.C.A. Payable (Employee)	\$	1,063.72	
Fed. W-H Tax		987.20	
S.D.I.		164.07	
St. W-H Tax		250.44	
Simple I.R.A		145.00	
Total Current Liabilities			\$ 2,610.43

Capital

Paid in Surplus		52,070.78	
Capital Stock		100.00	
Retained Earnings		53.44	
NET PROFIT or LOSS		-485.09	
Total Capital			51,739.13

TOTAL LIABILITIES and EQUITY

\$ 54,349.56

GLOBAL MEDIA MARKETING, INC.

STATEMENT OF PROFIT AND LOSS

	From 12/01/04 To 12/31/04		For The Year Ending 12/31/04	
Income				
Sales	\$ 45,210.00	100.0%	\$ 718,562.86	100.0%
Total Income	<u>45,210.00</u>	100.0%	<u>718,562.86</u>	100.0%
Cost of Sales				
Media Cost	43,095.00	95.3%	366,004.93	50.9%
Production Cost	3,050.00	6.7%	67,771.07	9.4%
Total Cost of Sales	<u>46,145.00</u>	102.1%	<u>433,776.00</u>	60.4%
GROSS PROFIT	<u>-935.00</u>	-1.9%	<u>284,786.86</u>	39.6%
Operating Expense				
Salary - Officers	7,000.00	15.5%	67,000.00	9.3%
Wages & Salaries	6,904.76	15.3%	68,045.48	9.5%
Outside Services	2,987.00	6.6%	40,005.75	5.6%
Telephone	319.80	.7%	4,201.38	.6%
Legal & Accounting	68.00	.2%	3,219.80	.4%
Dues - Subscriptions	0.00	0.0%	135.00	0.0%
Operating Supplies	1,548.63	3.4%	9,637.08	1.3%
Payroll Taxes	1,332.17	2.9%	10,549.00	1.5%
State Corp. Tax	0.00	0.0%	801.00	.1%
Licenses	0.00	0.0%	311.00	0.0%
Depreciation	40,995.00	90.7%	46,645.64	6.5%
Interest	0.00	0.0%	144.03	0.0%
Laundry	0.00	0.0%	50.79	0.0%
Office Supplies	295.78	.7%	4,104.88	.6%
Postage	426.43	.9%	5,103.10	.7%
Advertising	0.00	0.0%	277.65	0.0%
Rent	1,230.00	2.7%	14,790.00	2.1%
Auto & Truck	531.86	1.2%	2,688.22	.4%
Equipment Rental	0.00	0.0%	125.00	0.0%
Bank Service Charge	37.00	.1%	66.00	0.0%
Out-of-Town Travel	651.60	1.4%	5,925.60	.8%
Meals & Entertainment	332.97	.7%	1,445.55	.2%
Total Operating Expense	<u>64,661.00</u>	143.0%	<u>285,271.95</u>	39.7%
NET INCOME or <LOSS>	<u>\$ -65,596.00</u>	-144.9%	<u>\$ -485.09</u>	0.0%

GLOBAL MEDIA MARKETING, INC.

GENERAL LEDGER REPORT

From 12/01/04 to 12/31/04

Acct No.	Description	Date	Check Number	Current Period	Year to Date
1010	Bank of America			54,378.48	
	C.R.J.		1231	45,210.00	
	REC. MEALS		1231	-105.15	
	REC. SUPPLIES		1231	-28.01	
	REC. ATM FEE		1231	-2.00	
	REC. NOV P/R TAXES		1231	-3,739.19	
	REC. NOV P/R TAXES		1231	-620.92	
	REC. DEC PAYROLL		1231	-2,475.26	
	REC. SIMPLE IRA		1231	-1,040.00	
	REC. P/R FEE		1231	-68.00	
	KSTS		1202 1403	-5,525.00	
	VOID		1202 1404	0.00	
	RICHMOND DEV		1202 1405	-1,230.00	
	CHRIS HOLIDAY		1202 1406	-4,811.84	
	RYAN		1202 1407	-828.96	
	BRENT		1202 1408	-558.85	
	WES		1202 1409	-1,450.91	
	SHANNON		1202 1410	-273.51	
	RES MAGAZINE		1208 1411	-28.95	
	CAPITAL ONE		1208 1412	-512.84	
	PITNEY BOWES		1208 1413	-115.40	
	MPOWER		1208 1414	-180.65	
	OVERNIGHT EXPRESS		1208 1415	-288.72	
	AM EXPRESS		1208 1416	-101.96	
	AM EXPRESS		1208 1416	-3,132.25	
	AM EXPRESS		1208 1416	-124.22	
	AM EXPRESS		1208 1416	-139.75	
	AM EXPRESS		1208 1416	-481.13	
	AM EXPRESS		1208 1416	-5,287.89	
	T MOBILE		1208 1417	-139.15	
	KTNC		1215 1418	-12,750.00	
	DANNY ZEMANEK		1215 1419	-2,000.00	
	STEVE GARRY		1217 1420	-2,987.00	
	MIKE MORAN		1217 1421	-250.00	
	NAVARRO ENT.		1217 1422	-100.00	
	KWIE		1220 1423	-6,077.50	
	AM EXPRESS		1220 1424	-382.30	
	AM EXPRESS		1220 1424	-35.75	
	AM EXPRESS		1220 1424	-171.56	
	AM EXPRESS		1220 1424	-651.60	
	AM EXPRESS		1220 1424	-227.82	
	AM EXPRESS		1220 1424	-392.11	
	AM EXPRESS		1220 1424	-1,967.02	
	AM EXPRESS		1220 1424	-15,610.25	
	AM EXPRESS		1220 1424	-237.92	
	AM EXPRESS		1220 1424	-35.00	
	TUESDAYS GIRLS		1222 1425	-450.00	
	JESSIE HOLIDAY		1222 1426	-250.00	
	WES KONG		1222 1427	-750.00	
	RYAN BAXLEY		1222 1428	-250.00	
	BRENT		1222 1429	-250.00	
			TOTALS	-33,906.34	20,472.14

GLOBAL MEDIA MARKETING, INC.

GENERAL LEDGER REPORT

From 12/01/04 to 12/31/04

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Acct No.	Description	Date	Check Number	Current Period	Year to Date
1055	Accounts Receivable			500.00	
	C.R.J.	1231		45,210.00	
	C.R.J.	1231		-45,210.00	
			TOTALS	0.00	500.00
1060	Employee Advances			0.00	
	REC. DEC PAYROLL	1231		-7,924.07	
	CHRIS HOLIDAY	1202	1406	4,811.84	
	RYAN	1202	1407	828.96	
	BRENT	1202	1408	558.85	
	WES	1202	1409	1,450.91	
	SHANNON	1202	1410	273.51	
	WES KONG	1222	1427	750.00	
	RYAN BAXLEY	1222	1428	250.00	
	BRENT	1222	1429	250.00	
			TOTALS	1,250.00	1,250.00
1061	Loan to Shareholder - Chri			0.00	
	AM EXPRESS	1220	1424	237.92	
			TOTALS	237.92	237.92
1101	Furniture & Fixtures			400.00	
			TOTALS	0.00	400.00
1110	Equipment			80,236.23	
	AM EXPRESS	1208	1416	5,287.89	
	AM EXPRESS	1220	1424	1,967.02	
			TOTALS	7,254.91	87,491.14
1210	Less Accum. Depreciation			-16,241.64	
	REC. DEPRECIATION	1231		-40,995.00	
			TOTALS	-40,995.00	-57,236.64
1301	Deposits - Rent			1,235.00	
			TOTALS	0.00	1,235.00
2021	F.I.C.A. Payable (Employee			-1,217.36	
	REC. NOV P/R TAXES	1231		1,217.36	
	REC. DEC PAYROLL	1231		-1,063.72	
			TOTALS	153.64	-1,063.72
2023	Fed. W-H Tax			-1,304.47	
	REC. NOV P/R TAXES	1231		1,304.47	
	REC. DEC PAYROLL	1231		-987.20	
			TOTALS	317.27	-987.20
2031	S.D.I.			-187.76	
	REC. NOV P/R TAXES	1231		187.76	
	REC. DEC PAYROLL	1231		-164.07	
			TOTALS	23.69	-164.07
2033	St. W-H Tax			-318.35	
	REC. NOV P/R TAXES	1231		318.35	

GLOBAL MEDIA MARKETING, INC.

GENERAL LEDGER REPORT

From 12/01/04 to 12/31/04

Acct No.	Description	Date	Check Number	Current Period	Year to Date
(continued)					
2033	St. W-H Tax			-250.44	
	REC. DEC PAYROLL	1231			
			TOTALS	67.91	-250.44
2035	Simple I.R.A			-145.00	
	REC. DEC PAYROLL	1231		-1,040.00	
	REC. SIMPLE IRA	1231		1,040.00	
			TOTALS	0.00	-145.00
3001	Paid in Surplus			-52,070.78	
			TOTALS	0.00	-52,070.78
3015	Capital Stock			-100.00	
			TOTALS	0.00	-100.00
3310	Retained Earnings			-53.44	
			TOTALS	0.00	-53.44
4010	Sales			-673,352.86	
	C.R.J.	1231		-45,210.00	
			TOTALS	-45,210.00	-718,562.86
4070	Media Cost			322,909.93	
	KSTS	1202	1403	5,525.00	
	VOID	1202	1404	0.00	
	AM EXPRESS	1208	1416	3,132.25	
	KTNC	1215	1418	12,750.00	
	KWIE	1220	1423	6,077.50	
	AM EXPRESS	1220	1424	15,610.25	
			TOTALS	43,095.00	366,004.93
4075	Production Cost			64,721.07	
	DANNY ZEMANEK	1215	1419	2,000.00	
	MIKE MORAN	1217	1421	250.00	
	NAVARRO ENT.	1217	1422	100.00	
	TUESDAYS GIRLS	1222	1425	450.00	
	JESSIE HOLIDAY	1222	1426	250.00	
			TOTALS	3,050.00	67,771.07
5010	Salary - Officers			60,000.00	
	REC. DEC PAYROLL	1231		7,000.00	
			TOTALS	7,000.00	67,000.00
5015	Wages & Salaries			61,140.72	
	REC. DEC PAYROLL	1231		6,904.76	
			TOTALS	6,904.76	68,045.48
5020	Outside Services			37,018.75	
	STEVE GARRY	1217	1420	2,987.00	
			TOTALS	2,987.00	40,005.75
5070	Telephone			3,881.58	
	MPOWER	1208	1414	180.65	

GLOBAL MEDIA MARKETING, INC.

GENERAL LEDGER REPORT

From 12/01/04 to 12/31/04

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Acct No.	Description	Date	Check Number	Current Period	Year to Date
=====					
5070	Telephone	(continued)			
	T MOBILE	1208	1417	139.15	
		TOTALS		319.80	4,201.38
5080	Legal & Accounting	BEGINNING BAL.		3,151.80	
	REC. P/R FEE	1231		68.00	
		TOTALS		68.00	3,219.80
5090	Dues - Subscriptions	BEGINNING BAL.		135.00	
		TOTALS		0.00	135.00
5120	Operating Supplies	BEGINNING BAL.		8,088.45	
	REC. SUPPLIES	1231		28.01	
	RES MAGAZINE	1208	1411	28.95	
	CAPITAL ONE	1208	1412	512.84	
	PITNEY BOWES	1208	1413	115.40	
	AM EXPRESS	1208	1416	481.13	
	AM EXPRESS	1220	1424	382.30	
		TOTALS		1,548.63	9,637.08
5150	Payroll Taxes	BEGINNING BAL.		9,216.83	
	REC. NOV P/R TAXES	1231		1,217.36	
	REC. NOV P/R TAXES	1231		114.81	
		TOTALS		1,332.17	10,549.00
5161	State Corp. Tax	BEGINNING BAL.		801.00	
		TOTALS		0.00	801.00
5170	Licenses	BEGINNING BAL.		311.00	
		TOTALS		0.00	311.00
5200	Depreciation	BEGINNING BAL.		5,650.64	
	REC. DEPRECIATION	1231		40,995.00	
		TOTALS		40,995.00	46,645.64
5230	Interest	BEGINNING BAL.		144.03	
		TOTALS		0.00	144.03
5240	Laundry	BEGINNING BAL.		50.79	
		TOTALS		0.00	50.79
5350	Office Supplies	BEGINNING BAL.		3,809.10	
	AM EXPRESS	1208	1416	124.22	
	AM EXPRESS	1220	1424	171.56	
		TOTALS		295.78	4,104.88
5360	Postage	BEGINNING BAL.		4,676.67	
	OVERNIGHT EXPRESS	1208	1415	288.72	
	AM EXPRESS	1208	1416	101.96	
	AM EXPRESS	1220	1424	35.75	
		TOTALS		426.43	5,103.10
5400	Advertising	BEGINNING BAL.		277.65	

GLOBAL MEDIA MARKETING, INC.

GENERAL LEDGER REPORT

From 12/01/04 to 12/31/04

Acct No.	Description	Date	Check Number	Current Period	Year to Date
5400	Advertising	(continued)			
		TOTALS		0.00	277.65
5450	Rent			BEGINNING BAL.	13,560.00
	RICHMOND DEV	1202	1405	1,230.00	
		TOTALS		1,230.00	14,790.00
5520	Auto & Truck			BEGINNING BAL.	2,156.36
	AM EXPRESS	1208	1416	139.75	
	AM EXPRESS	1220	1424	392.11	
		TOTALS		531.86	2,688.22
5525	Equipment Rental			BEGINNING BAL.	125.00
		TOTALS		0.00	125.00
5530	Bank Service Charge			BEGINNING BAL.	29.00
	REC. ATM FEE	1231		2.00	
	AM EXPRESS	1220	1424	35.00	
		TOTALS		37.00	66.00
5550	Out-of-Town Travel			BEGINNING BAL.	5,274.00
	AM EXPRESS	1220	1424	651.60	
		TOTALS		651.60	5,925.60
5560	Meals & Entertainment			BEGINNING BAL.	1,112.58
	REC. MEALS	1231		105.15	
	AM EXPRESS	1220	1424	227.82	
		TOTALS		332.97	1,445.55
				0.00	

A.J.E.

From 12/01/04 to 12/31/04

Date	Description	Check Number	Debit Account	Debit Amount	Credit Account	Credit Amount
123104	REC. DEPRECIATION		5200	40,995.00		

				40,995.00	1210	40,995.00

						40,995.00
123104	REC. MEALS		5560	105.15		

				105.15	1010	105.15

						105.15
123104	REC. SUPPLIES		5120	28.01		

				28.01	1010	28.01

						28.01
123104	REC. ATM FEE		5530	2.00		

				2.00	1010	2.00

						2.00
123104	REC. NOV P/R TAXES		2023	1,304.47		
			2021	1,217.36		
			5150	1,217.36		
			2033	318.35		
			2031	187.76		
			5150	114.81		

				4,360.11	1010	3,739.19
					1010	620.92

						4,360.11
123104	REC. DEC PAYROLL		5010	7,000.00		
			5015	6,904.76		

				13,904.76	2023	987.20
					2021	1,063.72
					2033	250.44
					2031	164.07
					1060	7,924.07
					2035	1,040.00
					1010	2,475.26

A.J.E.

From 12/01/04 to 12/31/04

Date	Description	Check Number	Debit Account	Debit Amount	Credit Account	Credit Amount
						13,904.76
123104	REC. SIMPLE IRA		2035	1,040.00		
				1,040.00		
					1010	1,040.00
						1,040.00
123104	REC. P/R FEE		5080	68.00		
				68.00		
					1010	68.00
						68.00
				60,503.03		60,503.03

C.R.J.

From 12/01/04 to 12/31/04

Date	Description	Check Number	Debit Account	Debit Amount	Credit Account	Credit Amount
123104	C.R.J.		1010	45,210.00		
			1055	45,210.00		

				90,420.00		
					1055	45,210.00
					4010	45,210.00

						90,420.00
				=====		=====
				90,420.00		90,420.00



PEOPLE SUPPORT

THE TRANSCRIPTION
Company

4100 W. Burbank Blvd 3rd Floor Burbank CA 91505

(818) 848-6500 FAX: (818) 450-0516

TM

CONFIDENTIAL PROPOSAL

TRANSCRIPTION & CAPTION SERVICES

GLOBAL MEDIA

TRANSCRIPTION:

• **FIELD TAPES/ RAW FOOTAGE CONTENT**

Verbatim Time-code transcripts

Per 30 minutes of content

\$70.00 per half hour

Transcripts with B-Roll log

\$80.00 per half hour

• **CLOSED CAPTIONING**

Standard 2-3 line Roll-Up

\$185.00 per 30 minutes

(Pop-On) captions

\$195.00 per 30 minutes

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

DBC (4:3) MASTERS going to 1-DBC (4:3) w/Closed Captioning each

ADDITIONAL CHARGES:

Closed Caption Encoding

\$120.00 / 34 minutes

and Conversions

\$230.00/ 64 minutes

TOTAL COST: Digibata Masters

\$305.00 per 30-minute episode

\$600.00 per 60-minute episode

Additional Chargers

Additional Rush Fees:

Surcharge 100% of closed caption rate

Applied only to Closed Caption Programs 30 minutes or less

Delivery with in 24 to 48 hours upon receipt of tapes.

ADDITIONAL DUBS

Quantity:	30:00	60:00
Beta- SP	42.25	56.50
1-10		
Digibeta	58.50	75.50
1-10		
VHS		
1	\$14.00	18.80
2-4	\$11.60	\$13.40
5-19	\$9.40	\$11.80
20-49	\$5.40	\$6.20
50-99	\$3.80	\$4.60

• **REAL-TIME CAPTIONING**

Closed Caption Service for Broadcast – Real-time \$125.00 per hour
Includes: News, Sports, Kids and Telethons

Segment Cut-in \$ 70.00 per each
 Segments 30 minute or less

OTHER AVAILABLE SERVICES:

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

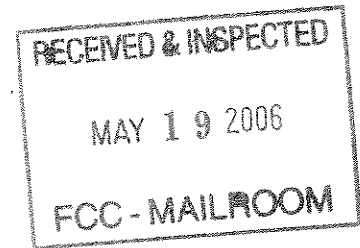
PAYMENT TERMS

NET 30 DAYS UPON RECEIPT OF INVOICE.

TERMS AND CONDITIONS:

Prices effective through December 31, 2006

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



May 18, 2006

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

Re: Reference Number CGB-CC-0074 – In response to your request for additional financial information and Affidavit.

Dear Commission's Secretary:

Attached please find a copy of 2005 financial information for Global Media in compliance with your request for information accompanied by Affidavit. This is all in regard to our current Petition for exemption from closed captioning.

Please feel free to contact us if you require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Alice Ensor".

Alice Ensor
Global Media



1032 W. Yale Ave. Orange, CA 92665

RECEIVED & INSPECTED
MAY 19 2006
FCC - MAILROOM

May 17, 2006

FCC Commission on Closed Captioning

Re: Petition CGB-CC-0074

The following is my sworn statement with regard to the attached financial information for Global Media Marketing.

I, Christian Holiday, do swear and affirm that the financial information attached is, to the best of my knowledge, true and accurate. This sworn statement has been attested to by a Notary Public as noted below.

Sincerely,



Christian Holiday
Global Media Marketing

State of California
County of Orange } ss.

SUBSCRIBED AND SWORN TO BEFORE ME ON

MAY 17, 2006

BY Christian Holiday


NOTARY PUBLIC

GLOBAL MEDIA MARKETING, INC.
STATEMENT OF PROFIT AND LOSS

	From 12/01/05 To 12/31/05		For The Year Ending 12/31/05	
Income				
Sales	\$ 538,388.61	100.0%	\$ 1,461,941.31	100.0%
Total Income	<u>538,388.61</u>	100.0%	<u>1,461,941.31</u>	100.0%
Cost of Sales				
Media Cost	474,563.90	88.1%	931,422.58	63.7%
Production Cost	51,359.97	9.5%	113,128.78	7.7%
Total Cost of Sales	<u>525,923.87</u>	97.7%	<u>1,044,551.36</u>	71.4%
 GROSS PROFIT	 <u>12,464.74</u>	 2.3%	 <u>417,389.95</u>	 28.6%
Operating Expense				
Salary - Officers	382.80	0.0%	82,000.00	5.6%
Wages & Salaries	53,000.17	9.8%	151,499.10	10.4%
Outside Services	12,380.00	2.3%	66,836.95	4.6%
Simple I.R.A.	0.00	0.0%	9,170.00	.6%
Insurance	2,312.50	.4%	4,325.50	.3%
Telephone	1,234.62	.2%	6,070.34	.4%
Legal & Accounting	578.00	.1%	3,132.05	.2%
Dues - Subscriptions	71.70	0.0%	71.70	0.0%
Operating Supplies	8,207.07	1.5%	24,460.32	1.7%
Payroll Taxes	-8,957.94	-1.5%	19,140.36	1.3%
State Corp. Tax	800.00	.1%	800.00	0.0%
Licenses	0.00	0.0%	223.00	0.0%
Depreciation	3,058.50	.6%	12,234.00	.8%
Interest	315.15	0.0%	712.65	0.0%
Laundry	222.55	0.0%	222.55	0.0%
GASOLINE	11.87	0.0%	11.87	0.0%
Office Supplies	543.13	.1%	1,225.55	0.0%
Postage	2,562.96	.5%	9,027.73	.6%
Advertising	430.55	0.0%	730.55	0.0%
Rent	4,590.00	.9%	17,765.00	1.2%
Auto & Truck	1,262.07	.2%	7,648.06	.5%
Bank Service Charge	61.95	0.0%	281.25	0.0%
Bank Cr-Card Fees	0.00	0.0%	1.23	0.0%
Out-of-Town Travel	667.30	.1%	10,360.89	.7%
Meals & Entertainment	1,051.46	.2%	3,395.79	.2%
Total Operating Expense	<u>84,786.41</u>	15.7%	<u>431,346.44</u>	29.5%
 NET INCOME or <LOSS>	 <u>\$ -72,321.67</u>	 -13.4%	 <u>\$ -13,956.49</u>	 -.8%

GLOBAL MEDIA MARKETING, INC.

BALANCE SHEET
For The 12 Months Ended 12/31/05

ASSETS

Current Assets

Bank of America	\$	-24,483.73
Employee Advances		390.07
Loan to Shareholder - Chris		4,407.16

Total Current Assets			\$	-19,686.50
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Fixed Assets

Furniture & Fixtures		3,135.97
Equipment		113,952.21
Vehicles		42,004.15
Less Accum. Depreciation		-69,470.64

Total Fixed Assets				89,621.69
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Other Assets

Deposits - Rent		1,235.00
Deposit - Other		199.80

Total Other Assets				1,434.80
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TOTAL ASSETS			\$	<u>71,369.99</u>
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LIABILITIES and EQUITY

Long Term Liabilities

Chrysler Fin.	\$	36,587.35
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Total Long Term Liabilities			\$	36,587.35
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Capital

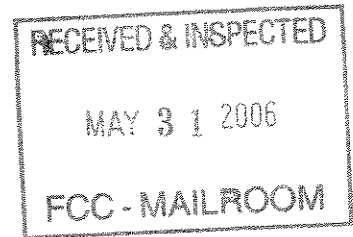
Paid in Surplus		49,070.78
Capital Stock		100.00
Retained Earnings		-431.65
NET PROFIT or LOSS		-13,956.49

Total Capital				34,782.64
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TOTAL LIABILITIES and EQUITY			\$	<u>71,369.99</u>
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Global Media Marketing

1032 W. Taft Ave. Orange, CA 92865
(714) 974-5074



May 18, 2006

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

Re: Reference Number **CGB-CC-0074** – In response to your request for a revised Affidavit.

Dear Commission's Secretary:

Attached please find an Affidavit covering all paperwork submitted by Global Media thus far with regard to our current Petition for exemption from closed captioning.

Please feel free to contact us if you require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Alice Ensor".

Alice Ensor
Global Media



Global Media Marketing

1032 W. Taft Ave. Orange, CA 92865
(714) 974-5074



May 30, 2006

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

Re: Petition Reference Number CGB-CC-0074 – Closed Captioning

The following is my sworn statement with regard to all filings, all information and all financial information, submitted thus far by Global Media Marketing with regard to the Petition for exemption from Closed Captioning.

I, Christian Holiday, do swear and affirm that all information submitted to The Federal Communications Commission, up to and including today, is to the best of my knowledge, true and accurate. This sworn statement has been attested to by a Notary Public as noted below.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christian Holiday".

Christian Holiday
Global Media Marketing



RECEIVED & INSPECTED
MAY 31 2006
FOG MAIL ROOM

JURAT

State of CALIFORNIA

} ss.


County of ORANGE

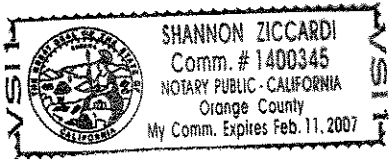
Subscribed and sworn to (or affirmed) before me

this 30th day of MAY, 2006, by
Date Month Year

(1) CHRISTIAN HOLIDAY
Name of Signer (s)

(2) _____
Name of Signer (s)


Signature of Notary Public



Place Notary Seal Above