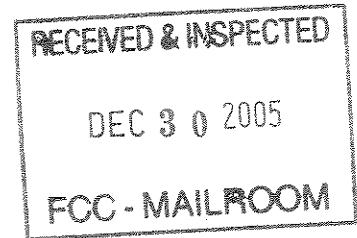


CGB-CC-0080



Kim Morrissey
188 Main Street
New York Mills, NY 13417

December 20 2005

Federal Communications Commission
Disabilities Rights Office
445 12th Street SW
Washington, DC 20554

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

I am a member of the New Testament Church and the producer of our local weekly television show "Glory to Glory" which airs every Sunday at 7:30am on WFXV, a Fox affiliate in Utica, NY. (DMA ranking of 168) We are requesting an exemption from the closed captioning requirements, under Section 79.1 of the Commission's rules,

I believe that the program "Glory to Glory" qualifies for this exemption for the following reasons.

Part 79.1 Section (F)

Compliance would impose an undue burden for the following reasons:

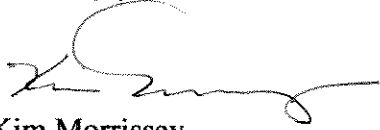
Glory to Glory is a ministry outreach of The New Testament Church, 506 West Dominick Street, Rome NY. New Testament Church is small, averaging about 40 families. Funding for airing the program comes from a few individuals and is not part of the church budget. Further, the church does not own any production or postproduction equipment. The production of the show is donated by Media Partners Group a small production company owned by my husband and myself. We are the companies' only employees. The total costs for the show is \$175 per week, all of it going toward airtime, on WFXV. Except for the local cable companies that must carry WFXV programming, we Glory-to Glory is not broadcast by any other carrier. The program consists of a one-camera shoot of the sermon portion of our church service. Glory to Glory does not solicit donations.

We have received quotes from companies providing closed captioning. The average estimate is \$300 per show. Because we are located in a small, economically weak market finding that much in additional donations is prohibitive at this time. Because Media Partners Group donates production services to New Testament Church we are often under a deadline to complete editing of the current program in time for WFXV's deadline. The additional time requirement to send the tape to another company for Closed Captioning would also make production difficult. There is no local closed captioning service company available in our area.

Glory to Glory will be celebrating its 2nd year on air anniversary in April 2006. We believe that our message is reaching people and that there will be church growth and additional funds at some point in the future. We believe that our message should be available to all and are looking forward to the day when we will be able to afford closed captioning. But for now, if we do not receive an exemption, I believe that we would not have the resources to provide closed captioning and we would have to discontinue broadcasting our message.

I'm sorry that this request comes to you so close to the December 31st deadline for compliance. I had just received a letter from the General Manager of WFXV informing us that the new law applies to our program. The church will send financial information soon. I can be reached at 315-723-2601 or by e-mail kim@mpgfilms.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Kim Morrissey', with a long horizontal flourish extending to the right.


Kim Morrissey
Producer, Glory-to-Glory

Re; Reference : CGB-CC-0080

DECLARATION:

I, Magead Salloum, am pastor of New Testament Church, 506 West Dominick Street, Rome NY 13440. I have reviewed the petition for Exemption From Closed Captioning Requirements filed on behalf of New Testament Church and our television ministry program called "Glory to Glory. I certify that to the best of my knowledge the information presented therein is true and accurate.

Signed :  Date : 3/10/06



ANTHONY J. CARLO
Notary Public, State of New York
Qualified in Oneida County
My Commission Expires Oct. 5, 2009.

3-10-06

March 7, 2005

Federal Communications Commission
Disabilities Rights Office
445 12th Street SW
Washington, DC 20554

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

Re; Reference : CGB-CC-0080

Because we received a notice from WFXV on December 16, 2005 informing us of the closed captioning requirements, there was not enough time to submit a petition for exemption containing all the information the FCC needs to make a determination on our behalf.

We are now sending the rest of the required information including the following:

1. Fact Sheet
2. Three quotes from Closed Captioning Service Providers
3. Financial statements for 2003, 2004, 2005
4. Contract from WFXV with airtime schedule.
5. Signed Affidavit (Declaration)

We thank you for your patience and await your decision in this matter.

Sincerely yours,



Kim Morrissey
Producer, Glory-to-Glory

315-768-0277 Daytime phone number

Re; Reference : CGB-CC-0080

“Glory to Glory” is an outreach program of the New Testament Church 506 West Dominick Street, Rome NY, featuring a sermon message given by Pastor Magead Salloum. Kim Morrissey is the producer. The half hour show airs weekly on WFXV Sunday mornings (Contract enclosed). New Testament Church is a 501 (c)(3) organization.

We have obtained three quotes from closed captioning companies and have selected the lowest quote to use in the below budget. (All three quotes are enclosed.)

Quotes for Closed Captioning

Quote #1	Video Caption Corporation	\$ 220.00
Quote #2	Talking Type	\$ 250.00
Quote #3	New Day Media	\$ 315.00

Television Ministry Budget

Air Time	\$ 10,600.00
Tape Cost.....	<u>\$ 850.00</u>
Current Total	\$ 11,456.00

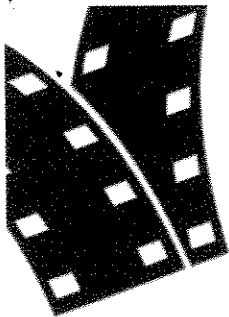
pAdditional Closed Captioning Expenses

CC (\$220 x 52).....	11,400.00
Shipping ((\$25 x 2)x 52).....	<u>2,600.00</u>
Add to Budget	\$ 14,000.00

Church Budget for the past three years: (Income and Expense Sheets enclosed)

<u>Year</u>	<u>income</u>	<u>expenses</u>
2003	98,389.34	96,972.54
2004	118,479.40	124,737.03
2005	142,644.78	128,868.39

Fiscal year 2005 shows a surplus. In actuality, this surplus is already gone. New Testament Church is currently in a growth phase. We have outgrown the building that we currently occupy and have put in a purchase offer of \$275,000 on another building that we deem suitable for our needs. We have already paid a \$5,000 deposit in 2006, and are currently working on a capital campaign to raise a down payment. We are currently unable to find a sponsor to pay for closed captioning expenses.



VIDEO CAPTION CORPORATION

DATE: February 22, 2006
 TO: Kim Morrissey / Media Partners Group
 FROM: Justin K. Macedonia / Video Caption Corporation
 RE: Closed Captioning Proposal

Dear Kim:

It was a pleasure speaking with you and having the opportunity to discuss close captioning your show. Video Caption Corporation very much appreciates the opportunity to submit this proposal to caption programming for Media Partners Group.

As we discussed, Video Caption Corporation (VCC) is a full service captioning communications firm specializing in offline captioning services for broadcasters, corporations, independent producers, schools, libraries, churches, and government agencies.

VCC is proposing to close caption the following programs at the discounted rates set forth below. **Reduced rates reflect discounts for volume.**

<u>Program Titles</u>	<u># Shows / Length</u>
Weekly Church Program	52 half-hour shows
Total number of shows	52

Pricing

Captioning Rate Breakdown:

Roll-up Captioning.....\$300 / 30 minutes

Reduced Rates for Media Partners Group:

Roll-up Captioning.....\$200 / 30 minutes

Tape Stock (DVCPPro).....\$20 / 30 minutes

Transcription.....Included

Caption Encoding.....Included

Kim, we will always do our very best to make this process as easy and affordable as we can. If you have any questions or concerns, please do not hesitate to contact me at any time. I will call you in a few days to follow up. I am certain we can develop a partnership that is mutually beneficial.

Thank you for your time and your consideration of our proposal. We look forward to working with you.

Contact Information

I am available if you have any questions about this proposal. Please contact me anytime.

Telephone: (800) 705-1203
Facsimile: (845) 868-1188
Email: jkmacedonia@vicaps.com
Website: www.vicaps.com

Justin K. Macedonia
Video Caption Corporation

CC Quote # 2

From: <contact_us@talkingtypecaptions.com>
Subject: **RE: CC for weekly local TV program**
Date: February 22, 2006 1:23:08 PM EST
To: "'Walt Morrissey'" <walt@mpgfilms.com>

Hi Kim:

Thanks for considering Talking Type for your captioning needs. We are A&E approved captioning vendors. Please find below a quote for the captioning.

Transcription:	\$60.00
Roll-up captions:	\$90.00
Making DVC-Pro master:	\$100.00

Would you be able to give us a VHS dub of the show with BITC? If we do it we'll have to charge you \$40.00 per minute.
The turnaround time is 4 days.

Many thanks,

Sanjay Chabra

President
Talking Type Captions
10812 St. Paul St., Kensington, MD 20895
301-933-1900
sanjay@talkingtypecaptions.com
www.TalkingTypeCaptions.com

-----Original Message-----

From: Walt Morrissey [mailto:walt@mpgfilms.com]
Sent: Wednesday, February 22, 2006 11:01 AM
To: contact_us@talkingtypecaptions.com
Subject: CC for weekly local TV program

Hello,

I am the producer of a local weekly television program. I would like a quote to provide CC for our program. The length is half hour (28:30) and it is for a church, the pastor preaching the entire time (except for intro and outro). There is of course no script. What is a standard around time that I can count on? What format? We shoot on DVC Pro - which is what the TV station also requires. Roll-up is fine.

Kim

Media Partners Group
188 Main Street

Closed Captioning Quote from New Day Media

For Kim Morrisey

Address: Media Partners Group
188 Main Street
New York Mills, NY 13417

Phone: 315/768-0277

Fax: 315 768-0278

Email: tmcneil@wave3tv.com

Length 28:30

Weekly Programs

Top left 2 line roll up

New Day Media, Inc. will provide transcription

Client will provide audio mp3 file of program before tape is sent

BetaSP to DVCPro Captioning

NDM will provide BetaSP tape with label

Shipping and Handling extra (Please provide return address and FedEx number for shipping.)

3-Day Turn around service

Rate: \$ 275.00 per program (Price includes Mastering to BetaSP)

Note: A DVCPro Dub costs \$30.00 ministry discounts (reg. \$45.00)

Checks payable to: New Day Media Inc.
Mailing Address: 8282 S. Memorial Suite 102
Tulsa OK 74133
Phone: (918) 250-4588
Email: kat@newdaymedia.com

Please fax back the Customer information attached and send us the date you expect to have the tape to us and the date you need it back. Also communicate to us how you want the label to read on the finished CC Master i.e. prog# etc.

NDM Representative:

Accepted By:

Printed Name:

FROM: FRANK PUMA

FAX NO.: 3152810091

02-24-06 03:11A P.01

Fax 768-0278

FRANK PUMA, ACCOUNTANT
310 E. CHESTNUT STREET
WEST WING SUITE 3
ROME, NEW YORK 13440
(315) 336-8226

FAX COVER SHEET

DATE: 2/24/06 PAGES (INCLUDING THIS SHEET) 10

FROM: Pastor Salloway

TO: Kim

FAX: (315) 281-0091

MESSAGE: Enclosed 2003, 2004, 2005
Support of Expenses for New Testament
Church.

New Testament Church
Income Statement 2003, 2004 & 2005

2003

General Fund	\$ 91,287.09
Love Offering (Guest Speaker)	4,170.96
Building Fund	1,525.00
Missions	514.77
Tape Ministry	101.50
Other	<u>790.02</u>
TOTAL - 2003	\$ 98,389.34

Checking Account Balance 12/30/03 - \$ 2889.94

2004

General Fund	\$ 105,587.22
Love Offering (Guest Speaker)	2,350.00
Building Fund	2,225.00
Youth Group	1,291.17
Missions	1,984.04
Benevolent Fund	256.00
Other	<u>4,785.97</u>
TOTAL - 2004	\$ 118,479.40

Checking Account Balance 12/31/04 - \$ 2116.95

2005

General Fund	\$ 113,855.80
Love Offering (Guest Speaker)	1,900.00
Building Fund	13,670.53
Youth Group	1,524.76
Missions	404.17
Benevolent Fund	11,000.00
Other	<u>261.52</u>
TOTAL - 2005	\$ 142,646.78

Checking Account Balance 12/31/05 - \$ 8542.92

Savings Account Balance 12/31/05 - \$ 14,008.78

PREPARED 1/24/2006
BY James P. Ples
TREASURER

2003

<i>Description</i>	<i>Account</i>	<i>Amount</i>
Children's Ministry		
<i>Summary for 'Account Number' = 144 (2 detail records)</i>		
Sum		\$127.00
Television Ministry		
<i>Summary for 'Account Number' = 147 (9 detail records)</i>		
Sum		\$5,150.00
Temporary Help		
<i>Summary for 'Account Number' = 148 (2 detail records)</i>		
Sum		\$270.00
Transfer Funds		
<i>Summary for 'Account Number' = 149 (1 detail record)</i>		
Sum		\$325.00
Grand Total		\$96,972.54

DISCRETIONARY ALLOWANCE

Summary for 'Account Number' = 113 (13 detail records)

Sum \$2,038.84

Office Supplies

Summary for 'Account Number' = 114 (3 detail records)

Sum \$241.43

Church Supplies

Summary for 'Account Number' = 115 (12 detail records)

Sum \$573.24

Auto Expense

Summary for 'Account Number' = 116 (54 detail records)

Sum \$8,436.54

Advertising

Summary for 'Account Number' = 117 (5 detail records)

Sum \$886.95

Missions

Summary for 'Account Number' = 118 (11 detail records)

Sum \$2,447.00

Postage

Summary for 'Account Number' = 119 (5 detail records)

Sum \$116.75

Capital Improvement

Summary for 'Account Number' = 123 (1 detail record)

Sum \$2,000.00

Hoag Road Taxes

Summary for 'Account Number' = 132 (1 detail record)

Sum \$132.51

Tuesday, January 24, 2006

Millington Aye Property

Summary for 'Account Number' = 134 (1 detail record)

Sum \$1,397.00

Miscellaneous

Summary for 'Account Number' = 140 (19 detail records)

Sum \$4,729.24

Bank Expense

Summary for 'Account Number' = 141 (2 detail records)

Sum \$144.75

Benevolence

Summary for 'Account Number' = 142 (2 detail records)

Sum \$3,039.45

Music Ministry

Summary for 'Account Number' = 143 (5 detail records)

Sum \$1,150.00

Children's Ministry

Summary for 'Account Number' = 144 (1 detail record)

Sum \$104.94

Television Ministry

Summary for 'Account Number' = 147 (8 detail records)

Sum \$6,650.00

Legal Expense

Summary for 'Account Number' = 150 (1 detail record)

Sum \$56.25

Grand Total

124,737.03

Expense Summary 2005

Description	Account	Amount
Annuity		
Summary for 'Account Number' = 100 (12 detail records)		
Sum		\$1,200.00
Payroll Pastor		
Summary for 'Account Number' = 101 (45 detail records)		
Sum		\$31,702.42
Housing Allowance		
Summary for 'Account Number' = 102 (27 detail records)		
Sum		\$13,268.66
Payroll Taxes		
Summary for 'Account Number' = 103 (19 detail records)		
Sum		\$9,791.65
Church Mortgage		
Summary for 'Account Number' = 104 (12 detail records)		
Sum		\$6,603.61
Church Utilities		
Summary for 'Account Number' = 105 (10 detail records)		
Sum		\$5,321.71
Church Insurance		
Summary for 'Account Number' = 106 (5 detail records)		
Sum		\$2,543.49
Church Maintenance		
Summary for 'Account Number' = 107 (3 detail records)		
Sum		\$1,546.79
Medical Insurance & Exp		
Summary for 'Account Number' = 108 (26 detail records)		
Sum		\$6,929.52
Guest Speaker Disbursemen		
Summary for 'Account Number' = 109 (5 detail records)		
Sum		\$1,748.00
Guest Speaker Expense		
Summary for 'Account Number' = 110 (1 detail record)		
Sum		\$42.25
Church Telephone		
Summary for 'Account Number' = 111 (7 detail records)		
Sum		\$434.82

2005

Description	Account	Amount
Music Ministry		
Summary for 'Account Number' = 143 (1 detail record)		
Sum		\$1,812.98
Children's Ministry		
Summary for 'Account Number' = 144 (2 detail records)		
Sum		\$444.98
Television Ministry		
Summary for 'Account Number' = 147 (9 detail records)		
Sum		\$8,145.95
Transfer Funds		
Summary for 'Account Number' = 149 (4 detail records)		
Sum		\$1,670.00
Grand Total		\$128,868.39

STATION: WFXV-TV

PAGE: 01 OF 01



5956 Smith Hill Road
Utica, NY 13503
(315) 797-5220
(315) 797-5222 Fax

MEDIA PARTNERS GROUP
290 MAIN ST.
NY MILLS, NY
WALT MORRISSEY
13417

AGENCY: MEDIA PARTNERS GROUP
ADVERTISER: NEW TESTIMENT CHURCH
TO BE LOGGED AS: NEW TESTIMENT/PAID P.
ORDER DATE: 02/08/06
CONTRACT NUMBER: 2744
REVISION DATE: 02/08/06
REVISION NUMBER: 00
ORDER START DATE: 02/12/06
ORDER END: 09/24/06
BILLING PERIOD: STANDARD
AGENCY - ADV #: 0296-0739
SALESPERSON: GOOD, KEITH - AGENCY
SALES OFFICE: AGENCY
RATE CARD: AGENCY
AGENCY ESTIMATE: 40
TOTAL OCCASIONS: 40
BUYER NAME:

INDICATES LINE ITEM REVISION

ITEM	BROADCAST DATES	SPOTS	LENGTH	SCHEDULE	BROADCAST PATTERN	MON	TUE	WED	THU	FRI	SAT	SUN	YTD	YTD	RATE/PLAN
1	02/12/06-03/26/06	5	30:00	10:00A-10:30A									1	1	175.00
2	02/12/06-03/26/06	5	30:00	07:30A-08:00A									1	1	50.00
3	04/02/06-09/24/06	5	30:00	07:30A-08:00A									1	26	175.00

Feb-March

CONTRACT/CONFIRMATION

MONTH	OCC	RATE	EXTENSION
FEB	3	175.00	525.00
	3	50.00	150.00
			675.00
			573.75
MAR	4	175.00	700.00
	4	50.00	200.00
			900.00
			765.00
APR	5	175.00	875.00
			875.00
			743.75
MAY	4	175.00	700.00
			700.00
			595.00
JUNE	4	175.00	700.00
			700.00
			595.00
JULY	5	175.00	875.00
			875.00
			743.75
AUG	4	175.00	700.00
			700.00
			595.00
SEPT	4	175.00	700.00
			700.00
			595.00
GROSS AMOUNT			6,125.00
AGENCY COMM			918.75
DISCOUNT TOTAL			5,206.25
CONTRACT TOTAL			5,206.25

STATION: WFXV-TV

PAGE: 01 OF 02



5956 Smith Hill Road
Utica, NY 13503
(315) 797-5220
(315) 797-5222 Fax

MEDIA PARTNERS GROUP
200 MAIN ST.
NY MILLS, NY
WALT MORRISSEY
13417

AGENCY: MEDIA PARTNERS GROUP
ADVERTISER: NEW TESTIMENT CHURCH
TO BE LOGGED AS: NEW TESTIMENT/PAID P.
ORDER DATE: 02/08/06
CONTRACT NUMBER: 2745
REVISION DATE: 02/08/06
REVISION NUMBER: 00
ORDER START: 10/01/07
ORDER END: 09/30/07
BILLING PERIOD: STANDARD
AGENCY - ADV #: 0296-0739
SALESPERSON: GOOD, KEITH - AGENCY
SALES OFFICE: AGENCY
RATE CARD
AGENCY ESTIMATE
TOTAL OCCASIONS: 53
BUYER NAME:

ITEM	BROADCAST DATES	LENGTH	SCH SCHEDULE	BROADCAST PATTERN	SPOTS	RATE/PLAN
A	10/01/06-09/30/07	30:00	10:00A-10:30A	1	1	53 200.00

*1 year - Sept 07
Oct 06 - 10 AM*

CONTRACT/CONFIRMATION

ACCEPTED-AGENCY/ADVERTISER: _____ DATE: _____ ACCEPTED-STATION: _____ DATE: _____

MONTH	OCC	RATE	EXTENSION
OCT	5	200.00	1,000.00
NOV	4	200.00	800.00
DEC	5	200.00	1,000.00
JAN	4	200.00	800.00
FEB	4	200.00	800.00
MAR	4	200.00	800.00
APR	5	200.00	1,000.00
MAY	4	200.00	800.00
JUNE	4	200.00	800.00
JULY	5	200.00	1,000.00

