

CGB-CC-0084

RECEIVED & INSPECTED
DEC 27 2005
FCC - MAILROOM



6737 W. Washington Street
Ste. 2223
West Allis, WI 53214
December 21, 2005

Federal Communications Commission
445 12th Street, S. W.
Washington D.C. 20554

Dear Sir or Madam,

I am co-owner along with my husband of a small communications business called TDS Management Group, Inc. in Wisconsin. We produce a weekly thirty minute television program about diversity that airs twice-on CBS 58 and WMLW TV 41 in Milwaukee, Wisconsin called 'Focus on Diversity with Troy Shaw.' We are requesting a temporary exemption from the closed captioning requirement that the FCC will implement on our program in 2006. We are not against the stipulation, but at this time the increased cost to our post production process would create an undue financial burden on our small business. We are requesting a one year exemption to get our finances in order.

We have received several quotes from subcontractors to add closed captioning to our program. There are two possible ways for us to add it to our program-offline and with our distributor. The cost for each method is broken down as follows:

Offline closed captioning with our distributor CBS 58 in Milwaukee.

** I spoke personally to the station manager, Jim Hall, about having his station add the closed captioning. He said his station would be able to do it for a fee of \$100 per show.*

Weekly	Monthly	Annually
100.00	\$433.00	\$5200.00

Offline closed captioning with subcontractor-Video Caption Corporation

Weekly	Monthly	Annually
\$200.00	\$954.00	\$11,440.00

Adding closed captioning to our television program would impact our operation in several ways. The first impact on our show would be an increase in the time each show has in post production. We would need to adjust our schedules in order to add closed captioning as the final piece to the show. This would cause us an inconvenience, but it

can be done. The second impact on our operation is financial. The increased cost to our production could go up between \$5200.00 and \$11,440.00 a year. That amount might not appear to be much, but any increase to our budget is a major burden for the owners.

Currently, our financial resources for the television program are very tight. As we near the year end of 2005, our total company revenues are less than \$225,000 with a deficit of nearly \$88,000.00. Any increase to our costs would be a serious blow to not only our company, but our family's livelihood. This company is our only source of income at the present time. I have enclosed our financial statements for Nov. 2005 for you to verify this information.

At this time, we do not have any other alternative as a reasonable substitute for closed captioning requirements. Adding any other text of the audio would still require transcribing services and increased editing time-which also increase cost to our current post production of the show.

TDS Management Group, Inc. is a communications company that creates the 'Focus on Diversity with Troy Shaw' television program and other video and audio productions. Most of our revenue came from advertisers of the television show in fiscal year 2005.

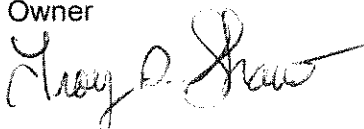
This company recently moved out of 'our basement' 18 months ago with the assistance of a SBA backed loan. We are struggling as a new small business, but feel that we can turn around our finances in 2006 with assistance from local supporters, the SBA and an exemption for one year from the FCC regulation requiring closed captioning. We feel that by January 2007, we will be ready to add closed captioning to our program.

One other factor for the FCC to consider about our petition for allowing us one year extension to be exempt from the FCC's closed captioning requirement is the unique nature of our program. Milwaukee is the most segregated city in the United States and our program serves a unique mission in opening up dialogue about race relations. Although our venture is not breaking even yet in terms of finances, we have been fortunate to have supporters who believe in our work and have given us no-interest loans until this show pays for itself.

We appreciate your careful consideration of our request.

Sincerely,

Troy D. Shaw
Owner



Laura J. Shaw
Co-Owner



L.J. Sutkiewicz & Associates, Inc.
308 E Oak Crest Dr
Wales WI 53183
262-968-1717

November 30, 2005

K758
WLM

December 14, 2005

TDS Management Group, Inc.
6737 W. Washington Street Suite 2223

West Allis, WI 53214

TDS Management Group, Inc.
6737 W. Washington Street Suite 2223

West Allis, WI 53214

K758

November 30, 2005

The accompanying financial statements as of November 30, 2005, and for the 11 Months, then ended, have been compiled by us.

A compilation is limited to presenting, in the form of financial statements, information that is the representation of management. We have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

TDS Management Group, Inc.
6737 W. Washington Street Suite 2223

West Allis, WI 53214

BALANCE SHEET
As of November 30, 2005

K758

ASSETS

CURRENT ASSETS

102.1	Checking-M & I Bank	\$	832.26
105	Savings-2735		2,039.19
107	M & I Bank Savings-2086		164.71
110	N/R Officer		18,559.21

TOTAL CURRENT ASSETS

21,595.37

FIXED ASSETS

145	Office Equipment		9,142.95
146	Fixtures & Equipment		105,784.73
147	Computers		48,142.59
148	Vehicles		24,343.49
149	Accumulated Depreciation		(85,414.74)

TOTAL FIXED ASSETS

101,999.02

TOTAL ASSETS

\$ 123,594.39

LIABILITIES AND STOCKHOLDERS' EQUITY

CURRENT LIABILITIES

207.1	American Express	\$	(500.00)
207.10	Citi-MasterCard		352.57
207.9	Discover		6,153.16
209	Capital One Card		1,339.92
214	N/P Richard Blomquist		5,000.00
216	N/P M & I LOC		45,883.41
217	N/P - Harris Bank		16,750.61
232	Accrued Federal & FICA		1,273.21
233	Accrued State Withholding		(804.61)
235	Accrued Unemployment		17.36

TOTAL CURRENT LIABILITIES

75,465.63

LONG TERM LIABILITIES

260	N/P Capital One Loan		28,783.70
265.1	N/P - Am Ex Lease #3		236.28
265.2	N/P - Am Ex Lease #4		1,709.30
266	N/P - Fleet Capital Lease		1,817.52
268	N/P - Richard Blomquist		20,000.00
269	N/P-M & I SBA Loan \$2076.10		157,494.35

TOTAL LONG TERM LIABILITIES

210,041.15

TOTAL LIABILITIES

285,506.78

EQUITY

281	Capital		21,004.96
283	Retained Earnings		(90,420.38)
284	Distributions		(5,300.00)
	Net Profit or (Loss)		(87,196.97)

Total Equity

(161,912.39)

TDS Management Group, Inc.
6737 W. Washington Street Suite 2223

West Allis, WI 53214

BALANCE SHEET
As of November 30, 2005

K758

**TOTAL LIABILITIES
AND EQUITY**

\$ 123,594.39

TDS Management Group, Inc.
6737 W. Washington Street Suite 2223

West Allis, WI 53214

INCOME STATEMENT

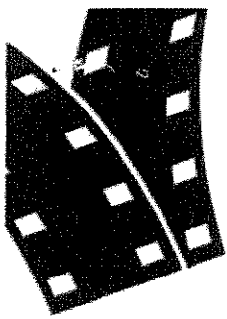
	1 Month Ended	11 Months Ended	Month	YTD
	November 30, 2005	November 30, 2005	%	%
Sales				
302 Sales	\$ 22,500.00	\$ 173,251.64	100.0	100.0
Total Sales	<u>22,500.00</u>	<u>173,251.64</u>	<u>100.0</u>	<u>100.0</u>
Cost of Goods Sold				
402 Purchases		18,930.69		10.9
409 Subcontract	7,980.00	63,233.31	35.5	36.5
415 Direct Labor	430.00	6,026.50	1.9	3.5
Total Cost of Goods Sold	<u>8,410.00</u>	<u>88,190.50</u>	<u>37.4</u>	<u>50.9</u>
Gross Profit	14,090.00	85,061.14	62.6	49.1
Operating Expenses				
508 Credit Card Costs		35.00		
510 Supplies		2,351.52		1.4
512 Postage & UPS	100.39	1,056.37	0.4	0.6
516 Officer Wages	6,350.00	81,460.00	28.2	47.0
520 Rent	2,073.17	17,219.51	9.2	9.9
521 Equipment Rentals		1,188.51		0.7
522 Equipment Lease	165.81	3,308.05	0.7	1.9
526 Utilities		2,753.51		1.6
529 Telephone	304.04	3,480.37	1.4	2.0
530 Repairs & Maintenance	1,034.50	1,034.50	4.6	0.6
534 Advertising & Promotion		5,549.22		3.2
535 Insurance	(695.93)	6,580.01	(3.1)	3.8
538 Meals & Entertainment	10.00	1,906.01		1.1
542 FICA Tax	518.68	6,692.74	2.3	3.9
543 Unemployment Tax	17.20	1,046.05	0.1	0.6
544 Sales Tax		61.67		
548 Licenses & Permits		210.00		0.1
550 Interest Expense	1,413.50	11,425.50	6.3	6.6
552 Vehicle Expense		3,252.67		1.9
558 Charitable Contributions		1,214.00		0.7
564 Legal & Accounting	419.73	3,897.30	1.9	2.2
565 Bank Charges	21.50	380.69	0.1	0.2
566 Office Expense	210.30	3,059.35	0.9	1.8
566.1 Internet	63.36	866.70	0.3	0.5
567 Education Expense		54.00		
575 Depreciation	1,064.59	11,710.49	4.7	6.8
580 Subscriptions		659.95		0.4
Total Operating Expenses	<u>13,070.84</u>	<u>172,453.69</u>	<u>58.1</u>	<u>99.5</u>
Operating Income (Loss)	1,019.16	(87,392.55)	4.5	(50.4)
Other Income				
902 Interest Income	0.14	54.09	-	

TDS Management Group, Inc.
6737 W. Washington Street Suite 2223

West Allis, WI 53214

INCOME STATEMENT

	1 Month Ended November 30, 2005	11 Months Ended November 30, 2005	Month %	YTD %
905 Misc. Income		228.49	-	0.1
Total Other Income	<u>0.14</u>	<u>282.58</u>	<u>0.0</u>	<u>0.2</u>
Other Expenses				
960 Fines & Penalties		87.00		0.1
Total Other Expenses	<u>0.00</u>	<u>87.00</u>	<u>0.0</u>	<u>0.1</u>
Net Income (Loss)	<u>\$ 1,019.30</u>	<u>\$ (87,196.97)</u>	<u>4.5</u>	<u>(50.3)</u>



VIDEO CAPTION CORPORATION

Date: 12/19/2005
 TO: Laura Shaw / TDS Management Group, Inc.
 FROM: Justin K. Macedonia / Video Caption Corporation
 RE: Closed Captioning Proposal

Dear Laura:

It was a pleasure speaking with you and having the opportunity to talk about closed captioning. Video Caption Corporation appreciates the opportunity to submit this proposal to caption programming for TDS Management Group, Inc.

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 discount for volume.**

<u>Program Titles</u>	<u># Shows / Length</u>
Diversity Talk Show	52 half-hour shows
Total number of shows	52

Pricing

Captioning Rate Breakdown:

Roll-up Captioning.....\$325 / 30 minutes

Reduced Rates for TDS Management Group, Inc.:

Roll-up Captioning.....\$220 / 30 minutes

Caption Encoding.....Included

Laura, 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

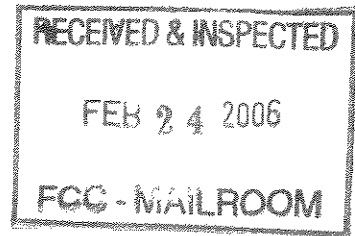
Facsimile: (845) 868-1188

Email: jkmacedonia@vicaps.com

Website: www.vicaps.com

Justin K. Macedonia
Director, Marketing and Business Development
Video Caption Corporation

CGB-CC-0084



6737 W. Washington Street
Ste. 2223
West Allis, WI 53214
December 21, 2005

February 22, 2006

Federal Communications Commission
Amelia Brown, Disability Rights Office
445 12th Street, S. W.
Washington D.C. 20554

Dear Amelia,

This letter is our affidavit swearing that the statements we made in our December 2005 petition to you are all true.

Sincerely,

A handwritten signature in cursive script, appearing to read "Troy D. Shaw".

Troy D. Shaw
Owner
TDS Management Group, Inc.

A handwritten signature in cursive script, appearing to read "Laura J. Shaw".

Laura J. Shaw
Co-Owner
TDS Management Group, Inc.