CGB-CC-0089

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Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20054

Petition for Exemption from Closed Captioning Requirements

Introduction

World Changes Tabernacle is a based out of Columbus, Georgia in the Muscogee County, located at 1241 Alta Vista Drive. It was established and Incorporated in 1991. The mission of World Changes Tabernacle is to teach and preach a simple gospel of our Lord and Savior Jesus Christ, that all may be able to live by.

The title of our program is "The Word Is On" and "The Final Word". "The Word Is On" program consist of biblical based lessons and sermons to assist the listening audience in their faith walk with God through Jesus Christ. This program answers and addresses many questions Christians may have concerning their belief. "The Final Word" is a program that addresses community issues both spiritual and non-spiritual. This program is designed to allow the church to answer everyday issues based on biblical principles. Therefore giving people more positive solutions to their everyday dilemmas.

"The Word Is On" program airs on every Monday and Thursday at 6:30 am and "The Final Word" airs every Tuesday at 6:30 am. Both programs air on WXTX-Columbus Fox 54, channel 9. Volunteers and staff members produce the shows

of World Changes Tabernacle. Our program is designed to reach the listening audience of Christians and non-Christians.

For the reasons set forth below, World Changes Tabernacle hereby requests an undue burden exemption from the closed captioning rules for "The Word Is On" and "The Final Word", pursuant to § 79.1 (f) of the Commission's rules.

Nature and Cost of Closed Captions

World Changes Tabernacle's staff has researched through internet, local produced broadcast shows and referrals from local television station. (See attached)

Impact on the Operation of the Program Provider

The total cost to produce both the "The Word Is On" and "The Final Word" is $16,419.00 (airtime and tapes). Each episode cost $105.25. The closed captioning will increase the cost of production by $150.00 per episode to out service each tape (increasing our budget almost 150%). To purchase the needed equipment, it would cost $8,554.65. There is also the undisclosed cost of training personnel on the new equipment. The cost for out servicing the program, the new machine and training of personnel are not presently in the fiscal years budget. This additional cost would put the production of the broadcast at a great disadvantage. Our present budget is already at its maximum and limited by overhead cost of replacement and repairs of present studio/editing equipment. Considering we have just entered into our next broadcast contract we would be unable to fulfill that contract with the local television station.

Financial Resources of the Program Provider

World Changes Tabernacle is a non-profit organization without tax-exempt status. Because our main source of income comes from the current members of World Changes

Tabernacle, we can only submit our budget to their free will giving. Our monthly income differs from month to month. We are unable at this time to incorporate any additional cost to our already limited budget. Our main expenditures are the mortgage, utilities, media, and salaries. To not be allowed proper time to solicit for supporters to assist in the purchase or production of closed captioning would only cripple our programming, being there is no other resources to divert these funds from. We have asked the local station if they would be able to do closed captioning for us. Unfortunately, they were not able but referred us to Raycom. (Quote attached)

Type of Operation of the Program Provider

We are a Christian based ministry. Our main purpose is to spread the good news of Jesus Christ. We have several outreach ministries within this ministry. We have the adopt a block, Save Our Youth, Men Mentoring (M&M), Youth ministry, Adult ministry, Television Ministry and others. Our efforts are not for profit. Most of our outreach is based on the generosity of others. We are primarily a non-profit religious institution.

Other factors

Petitioner believes that the local, non-news exemption to the closed captioning rules also applies to "The Word Is On" and "The Final Word". As noted above, the program is produced and distributed locally, and the sermons of World Changes Tabernacle are of primarily local public interest. The episodes are not news, they do not have repeat value, and the electronic newsroom technique is not available. Notwithstanding the applicability of the exemption, we have filed this petition in an abundance of caution and for the purpose of establishing certainty.

Conclusion

As shown by this Petition and its attachments, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The costs of captioning would be excessively high and would have significant impact on Petitioner's operations. The Petitioner's type of operations and financial resources are different in kind and magnitude from a mainstream programming provider. Because of the significant difficulty and expense of providing closed captioning, a waiver under § 79.1(f) is warranted. If more information is needed, please contact me at the address provided below.

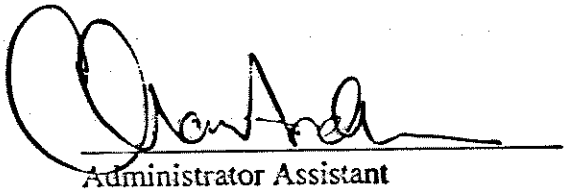
Respectfully submitted,

World Changes Tabernacle
By:

Chandra Anderson, Administrator Assistant
P. O. Box 5264, Columbus, GA 31906
(706) 562-8070
(706) 563-7877

Dated: December 21, 2005

I, Chandra Anderson, am the Administrator Assistant of World Changes Tabernacle, and have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of World Changes Tabernacle in this matter, and, upon information and belief, believe the statements regarding our organization and The Word Is On and The Final Word to be true and accurate.



Administrator Assistant

12/21/05

Date

FOX 54
WXTX

Paid Programming Agreement
WXTX and The World Changes Tabernacle

Programs will air January through December (1/2/06 – 12/28/06) for 52 weeks.

Monday's 6:30am-7:00am
Rate:$100

Tuesday's 6:30am-7:00am
Rate:$100
Thursday's 6:30am-7:00am
Rate:$100
Note: This is not a reserved program. The Monday, Tuesday and Thursday 6:30am program will run only if that time period has not been previously sold. If the program is not available, the program will not air unless WXTX and The World Changes Tabernacle agree upon another time period.

In appreciation of your business, WXTX will provide 510 10-sec commercial spots to build awareness of your program.
Commercial spots will air 10 times per week, Monday through Sunday, 6am-2am for the length of your commitment (1/2/06-12/28/06).

Total Investment: $15,600
Total Promotional Value: $ 10,000

WXTX: Kim O'Connor

Date: 12-1-05

The World Changes:

Date: 12-1-05

6524 Buena Vista Road • Columbus, Georgia 31907
706.568.2900 • Fax: 706.561.5965

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From: SEED23@aol.com Add to Address Book
Date: 2005/12/09 Fri AM 11:57:33 EST
To: risenfromashes@bellsouth.net
Subject: Closed Caption Rates

Sandy, I failed to ask you your format that you produce your show on. The price of $ include dubs. We can provide dubs on DVCPro, Beta SP, 3/4 inch, and Super VHS.I to send us your master and a dub to dub it on the cost remains at $150. If you want dub, the cost is an additional $30.00 or we can take your master and re-record the cl process back on to your master.

Call if you have any questions. Ask for Lester (706) 724-0114.

Download Attachment: Closed Caption Non Production.doc

Reply | Reply All | Forward | Move To: (Choose Folder) Go | Delete | Next

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The total amount of income for 01/01/05-06/30/05, given by World Changes Tabernacle member through tithes and offerings, was $125,391.08. Our total in expense for our main expenditures (mortgages, utilities, media, supplies, and salaries) was $122,279.58. If more information is needed, please contact me at the address below.

Respectfully submitted,

World Changes Tabernacle
By:

Chandra Anderson, Administrator Assistant
P. O. Box 5264, Columbus, Georgia 31906
(706) 562-8070
(706) 563-7877

Dated: December 21, 2005

CDI Media Solutions
1710 Lee Road

Orlando, FL 32810

Invoice No. 399670
Date: 03/25/05
Page No. 1

Sold To WORLD CHANGES TABERNACLE
PO BOX 5264

COLUMBUS, GA 31906

Ship To WORLD CHANGES TABERNACLE
1241 ALTA VISTA DR

COLUMBUS, GA 31907

Cust 371976 Ship date ASAP Ship via UPS Commercial Quote No. 32398
Salesman AG PO No. AG-WAKINIA Terms Ord No. 287592
Ord date 03/08/05

Quantity	Unit	Item Number	Description	Price	Unit	Extension
14	EACH	AY-DVM63PQ	VIDEO TAPE, MINI DV 63 MIN, PANASONIC PRO	5.25	EACH	73.50

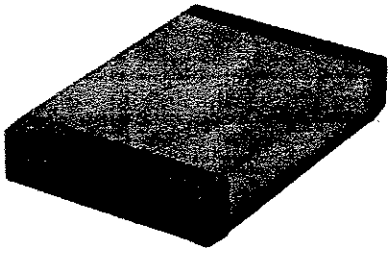
Sale Amt	73.50
Freight	.00
Sales Tax	.00
Total	73.50
Pmt Rec'd	73.50
Bal Due	.00

Do we have your email address?
If not, you're missing out on valuable specials and other information from CDI.
Example: we email order status and tracking numbers!

Nebraska Educational Assistive Technology

1910 Meridian Avenue
Cozad, NE 69130-1159
(308) 784-4525

(NEAT does not sell this product, please contact vendor for purchasing)



Closed Caption Encoder

Closed Caption Encoder (ccE)

ccE is a complete captioning system. It adds broadcast quality captions to your live or existing videos. A combination of a Windows based program along with an external box, which plugs into your PC's serial port. It meets all your FCC and ADA legal requirements for captioning. Unprecedented Ease-of-Use AND extremely cost-effective.

Seamless integration with existing Windows Applications. ccE works with Win95 and Win3.1 operating systems and applications. Cut, Edit, and Paste from/to your existing applications like Microsoft Word. ccE's built in editor is always only one mouse click away. Context sensitive help is also only one mouse click away.

Just start ccE up, (there are 5 icons available) click the LIVE icon and whatever you type is immediately encoded as captions. It's simultaneously being saved in the built in

editor so you can edit it at a later time. Two icons allow selecting between the Edit mode and the Caption mode where you select which lines are sent out as captions. The last two icons are primarily used when a live video feed is shared with precaptioned videotape, such as a live newscast interrupted by a commercial break. Many users only use one or two icons ever.

Cost: $8990.00

International Computers
7245 South 76th Street
Franklin, WI 53132
Phone: (414)764-9000
Web site: www.intlc.com

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RAYCOM POST PRODUCTION

Closed Captioning Services - 2006

Your internal post production facility, Raycom Post, can help your station with all of your closed captioning needs. The below pricing is based on a 30 minute post produced program. Pricing for additional run times and tape formats are available. Real time (live) closed captioning services can be quoted as well and will based on program length and periods covered. Please contact us for those rates.

- **Offline Captioning:** Transcribing of the actual verbatim program content in preparation for closed captioning encoding (shown below). Price includes (1) VHS work tape which is required for transcribing: **$272.00**
- **Closed Captioning Encoding:** Making use of the verbatim transcription file prepared above, this fee is for the actual CC encoding on line 21 of your master and will be in addition to the basic duplication rates. **$30.00**
- **Duplication to Betacam SP or DVC Pro: $35.00**
- **Duplication to Digital Betacam: $60.00**
- **Live Real Time Captioning:** *Please call for these rates. Pricing is based on the volume of live programming captioned.
- **Video Descriptive Services:** (aural description of screen content for the visually impaired): Call for rates.
- **Spanish and Multilingual captioning:** Call for rates.

Example: To create a 30 minute offline closed captioned DVC Pro master, it would cost **$337.00**.

Raycom Post Production – 4450 Lakeside Dr. # 300 - Burbank, CA 91505
818-846-0101 – 818-846-0277 –www.raycompost.com

Computer Prompting and Captioning Co. 1-800-977-6678 | info@cpcweb.com

>> Click below for Windows	>> Click below for Macintos
CaptionMaker CPC-500	CCaption-DV
CaptionMaker CPC-600/700	CCaption-NLE
CaptionMaker CPC-700NL	MacCaption-DV
CaptionMaker CPC-700NLE	MacCaption-NLE/Mpeg
CaptionMaker CPC-710	MacCaption-NLE/Mpeg/Sub
Printer-Friendly Brochure	**Printer-Friendly Brochure**

CPC-600 & CPC-700 CaptionMaker® (For Windows)

Capabilities at a Glance

- **Traditional Post-Production (Off-line) Captioning**
- **DVD Post-Production (Off-line) Captioning & Subtitling**
- **Non-Linear Post-Production (Off-line) Captioning**
- **Realtime (On-line) Captioning**
- **Webcast (Off-line & On-line) Captioning**
- **Traditional Post-Production (Off-line) Subtitling**
- **Caption/subtitle directly on the digital video withoutout any generation loss.**

Features

Post-Production Captioning

- Captions analog and digital video formats.
- Video is displayed in a window of the CaptionMaker software. Captions are dragged and dropped to the desired screen location using a mouse.
- All attributes of captions (e.g. color, italics) appear in the CaptionMaker as they would on a television monitor, providing a precise picture of how the captions will look in your final product.
- Software automatically converts raw text into basic captions.
- Built-in word processor designed from the ground up for captioning.
- Frame precise synchronization between dialogue and captions using time code with the CPC-700. Time code may even be assigned off-line using an inexpensive stereo VCR with 2 audio channels (one for LTC time code, one for dialogue).
- Synchronization is done on the fly or using the computer timer with the CPC-600. Although this does not provide the perfect frame-by-frame precision of the CPC-700, it is a cost-effective and time saving alternative for your captioning needs.
- Final captioning process is fully automated using time code with the CPC-700. This reduces the time needed with expensive VTRs to the time it takes to make a dub.

Software and Systems

Comparison of CPC-500/600/710/ 700/700NL/700NLE
System requirements
Software Prices
Hardware Prices
Systems and Prices
Ask the Customers
Our Awards

Software Prices

CPC-700NLE: Script Preparation, Encoding from hard drive & videotape (with TC) & Encoding without any CC Hardware **$7,995**

CPC-700NL: Script Preparation and Encoding from hard drive and videotape (with TC) **$5,995**

CPC-700: Script Preparation and Encoding from videotape only (with TC) **$4,995**

CPC-600: Script Preparation and Encoding from videotape only (non time code) **$2,995**

CPC-500: Realtime captioning using Speech Recognition **$1,995**

CPC-710: Encoding only. Use with hardware CC encoders **$995**
(Requires prepared caption file)

Software Encoders:
(No generation loss!)
CCaption-DV - $495
CCaption-NLE - $895
(When purchased with CPC-700 or CPC-700NL caption preparation software)
Click here for details.

Apple Mac Software CCaption/ MacCaption
(No generation loss when encoding captions)

A Few Sample Systems Listed

- Works with all brands of closed caption encoders.
- Simple-to-follow icons and intuitive design let you use the software right out of the box.
- Caption features comply with all EIA-608 specifications, including all the available modes: Pop-on, Paint-on & Roll-up.
- Machine control may be used to control VTRs using a mouse or the computer keyboard.

- All languages supported by closed caption decoders are available (English, Spanish, French, German, Italian, & Dutch).
- After captioning a video in one language, it can be captioned in additional languages in less than half the time it took to do the original.
- Import files from the following formats:
  - Microsoft Word®, WordPerfect® (any language)
  - Text with or without time code in and out
  - Cheetah, Inc.(*.asc) files
  - Captions, Inc.(*.cin) files
  - Caption Center (*.tds) files
  - Softni (*.sub) files
- Export caption/subtitle files for
  - Almost all major DVD authoring systems: Sonic Solutions, Spruce, Daikin, Pinnacle, CVC etc.
  - Webcasting using all three major Webcast players: RealPlayer, Media Player, QuickTime

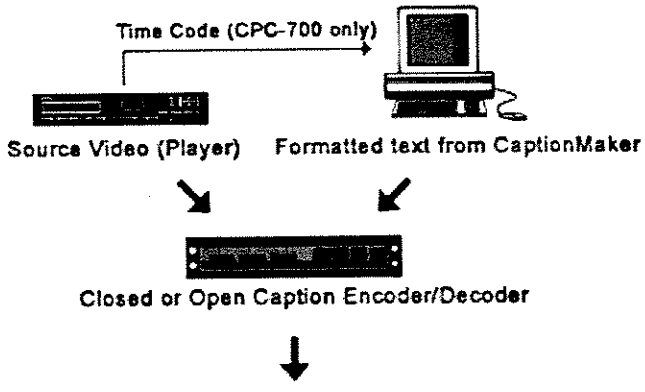
Realtime Captioning
The CaptionMaker software can caption live events using:

- Stenograph RapidWrite Pro® or Stenovation Catnip software to take steno input
- Speech recognition software (e.g. ViaVoice®)
- Speed typing software

Subtitling
The CaptionMaker software can be used to subtitle videos using the following devices:

- Chyron Codi (analog)
- MagniCoder Pro (analog and digital)
- Ultech DV-2000 (analog and digital)
- Almost all major DVD authoring systems: Sonic Solutions, Spruce, Daikin, Pinnacle, CVC etc.

Post-Production System Diagram



below are a few typical system prices. Visit our Systems and Prices for a complete overview and description of all our available systems.

Closed Captioning (Analog - Composite)
CPC-700, InsertaCap analog encoder, a time code card and a video display device
$7,435

Closed Captioning (Digital - D1)
CPC-700, Link PDE-890 serial digital encoder, a time code card and a video display device
$8,690

Open Captioning (Analog - Composite)
CPC-600, EEG DE241CG and a video display device
$4,095

What else can you do with CaptionMaker?

Retrieve caption data including time code and positioning information automatically from previously captioned videos using low cost hardware. You can then use the caption data to do the following:
» Generate a **DVD** caption or subtitle files
» Generate a **Webcast** caption file
» **Reinsert captions** onto time compressed video, which is often used in television re-runs
» **Reinsert captions** onto a newly edited version of a video that had been previously captioned

Webcast captioning
You can caption your existing videos on the Web with the CPC-700NL. To caption an existing video, which is known as a Video-on-Demand Webcast, the process is the same as that described earlier up to the point of AutoSync. Instead of AutoSync, the CaptionMaker exports a caption file for your Webcast. The CaptionMaker can create files for all three video players: Windows Media Player, RealPlayer,

Video With Captions (Recorder)

Software Prices

Original

Software	Price
CPC-700 NLE	$7,995
CPC-700 NL	$5,995
CPC-700	$4,995
CPC-600	$2,995
CPC-500	$1,995
CPC-710	$995
CCaption-DV	$995
CCaption-NLE	$1,995

Upgrades

Software (Within Windows)	Price
CPC-700NLE-UWW (from CPC-700)	$3,995
CPC-700NLE-UWW (from CPC-700NL)	$2,495
CPC-700NL-UWW (from CPC-700)	$1,995
CPC-700-UWW (from CPC-600)	$1,995
CPC-600-UWW (from CPC-500)	$995

Upgrades

Software (Dos to Windows)	Price
CPC-700NLE-UDW (from CPC-700)	$4,995
CPC-700NL-UDW (from CPC-700)	$2,995
CPC-700-UDW (from CPC-700)	$1,995
CPC-710-UDW (from CPC-710)	$495
CPC-600-UDW (from CPC-600)	$995

Bulk Discount: Discounts are offered for multiple software purchases.

Customer Support

Free 5 hours of phone support is provided for 12 months from the date the software was purchased; and 2 hours of free phone support for 6 months from the date a software upgrade was purchased. The following plan picks up when that free support ends.

Number of years	Price
1 Year (5 hours)	10% of the current price of the software
2 Year (10 hours)	18% of the current price of the software
3 Year (15 hours)	24% of the current price of the software
4 Year (20 hours)	28% of the current price of the software

QuickTime and Flash.

For captioning a live webcast, click here.
For a sample archived video of a live webcast, click here.

DVD Captioning/Subtitling can also be done in just a few minutes using a previously time stamped caption file. Simply import a time stamped file from the CaptionMaker or virtually any other captioning software; then export the file in the format of any major DVD authoring system.

V-Chip ratings can be added while captioning a video, and also added to a video with existing captions. Ratings can be changed second-by-second to reflect the changing program content.

WebTV Crossover Links can also be added while captioning a video, and added to a video with existing captions.

Why CPC is the Smart Choice

"The software is very user friendly. We were captioning the day we received our system."
Kevin Reeve
Utah State University

"With our CPC closed captioning software we don't have the expense of an outside service, nor do we have to wait for them to get it done . . .we can do it ourselves. Now it is done in-house, for less money, and in much less time."
John Linn
Xerox Corporation

"We have subtitled hundreds of videos on DVD with excellent results."
Jeremy Stuart
Visual Sound, Inc.

"It's as if the software were designed by a captioner, not a

Lifetime (Unlimited)	30% of the current price of the software

Deduct 15% from above prices if the above Support Plan is purchased at time of software purchase.

Pay as You Go Plan: If you do not like to purchase a yearly plan, or you have used up your hours allocated in your yearly support, you can always purchase our minute plan $3.00/minute. This will be billed at the time support is given.

Telephone Support Contracts
In addition to our quickly growing base of technical support documents, CPC also offers telephone support.

- New and Existing customers
- Support Contract

For more info. on necessary hardware and complete systems
Hardware Prices | Complete Systems and Prices

System Requirements

Post-Production Captioning

- A Windows 98/2000/XP/NT Computer
  (Recommended requirement is 1 GHz, 512 MB of memory.
  For CPC-700NLE, a faster computer with more memory will give better results)
- Minimum 1 serial port required to communicate with a CC encoder.
- Any video display device like a Dazzle DVC-80 (external) or an ATI VGA Wonder Pro card (internal) to see video on the computer screen.
- A Time Code Reader to read time code or external USB box (for CPC-710 and CPC-700/700NL/700NLE only)

Realtime Captioning

- A Windows 98/2000/XP/NT Computer
  (Recommended requirement is 1.5 GHz, 1 GB of memory.)

programmer. Caption features are presented in a very intuitive manner."
Burwell Ware, Caption Perfect, Inc.

"We have received excellent technical support. CPC has always been there for us, with knowledgeable support staff, providing answers in language we can understand."
Jeff Johnson ADR International

CPC Computer Prompting & Captioning Co.
1010 Rockville Pike, Suite 306
Rockville, MD 20852, USA
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E-mail: info@cpcweb.com
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Toll Free: 800-977-6678