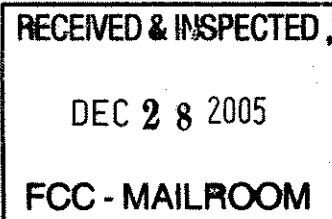


CGB-CC-0104

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20554



Petition for Exemption from Closed Captioning Requirements

Introduction:

Pastor James D. Corbett founded Greenville Community Christian Church, Inc. (CCC) in 1982, DBA Community Christian Church. The church is located in Greenville, NC. The mission of the church is to go into every man's world preaching the good news of Jesus Christ.

The title of the program is the "Door of Faith" television broadcast. The title comes from Acts 14:27 where God opened a door of faith unto the gentiles. Likewise, through the "Door of Faith" television broadcast, a door of faith, offering hope, love and acceptance through the shed blood of Jesus Christ is made available to all who will believe on Him. The program begins with an opening followed by a greeting and briefing on the day's message. A song may follow right before the gospel message is preached. The program closes making products available followed by the broadcast closing. Through the "Door of Faith" broadcast, I, Pastor James D. Corbett and the Community Christian Church family, are able to reach out with the gospel to more people corporately than any of us could individually in any given week.

The broadcast airs each Sunday at 6 am in a 30-minute time slot on WITN-TV 7 from Washington, NC. The actual length of each broadcast is 28:25, allowing for commercials and station identification breaks. Each program is recorded, edited, dubbed and sent to the station by hired church staff. The "Door of Faith" broadcast reaches people from all walks of life, all ages and races as evidenced by viewer response via phone calls, letters and personal visits to the church resulting from watching the broadcast. The "Door of Faith" broadcast gives those convalescing, working and home bound a worship opportunity.

For the reasons set forth below, Community Christian Church hereby requests an undue burden exemption from closed captioning rules for the "Door of Faith" broadcast, pursuant to 79.1(f) of the Commission's rules.

Nature and Cost of Closed Captions:

I have contacted at least two companies offering closed captioning services and depending on the choice of service, it can be a very costly endeavor. Attached is a quote for Real-time display captioning and post-production, roll-up captioning from Carolinas Captioning. Real-time captioning is more affordable, but not necessarily the best option for our ministry who has been entrusted with the responsibility of relaying the truth of the God's Word. Even with a 98.9%

accuracy rate, an error, whether due to misinterpreting dialect or a misprint of the scripture could be costly when dealing with people who are depending on and trusting in the integrity of the ministry they have come to know by consistently watching for a number of years.

We did consider doing the captioning in-house by listening to each message and using a character generator to caption the program. This is something we could do in-house, but the idea was rejected due to enormous amount of time it would take for a limited staff to do this in addition to the other assigned duties. To listen to a message in its entirety, get the information to be captioned, edit the program and then go back and add captioning would take a minimum of 16 hours at ~ \$11.25 per hour for a total of \$135.00. In addition, this would require more staffing to do the remaining duties, which would require skill and expertise in the media production area.

Impact on the Operation of the Program Provider

It is difficult to give the true cost of producing the show per year because paid staff provides this service for the church along with other duties and responsibilities. However, here is an estimation of the cost per year based on a salary approximation. It takes approximately 3 hours to produce a program from start to finish. This includes selecting the message, listing the scriptures and subtitles in the character generator, timing all tags, editing the broadcast message, dubbing the taped message on the station preferred format and labeling the tapes, the tape boxes and the package. At roughly \$11.25 per hour, this comes out to be \$33.75 per broadcast multiplied times 4 broadcasts per month equals \$135.00, multiplied times 12 months equals \$1,620.00 per year. I do not have financial documentation to support this because the service is done in-house and not outsourced. Each broadcast costs the ministry ~ \$135.00 to produce. Post-production, roll-up captioning at a rate of \$225.00 per broadcast (4 broadcasts per month) would increase our monthly cost by \$900.00. This would increase the cost of production by 87%! Due to the limited financial support from viewers, this would have a great financial impact on our ministry who is already in a building program.

Financial Resources of the Program Provider

Our church does have tax-exempt status. Please see document attached. As stated above, there is very limited financial support from the viewers for the broadcast. The cost to broadcast is underwritten by the church. The money to cover the increase listed above would have to be taken from another area because the church's media department, which produces the program, is not close to being self-supported. Income/Expense documents attached.

WITN-TV 7 states they do not offer captioning service.

Type of Operation of the Program Provider

We are a church whose total support comes from the tithes and offerings of the parishioners. We offer services and fellowships to strengthen the family, which in turn strengthens the community. There are fellowships/services tailored specifically for the children, youth, singles, women, men, married and older saints of the church. These fellowships take place weekly, monthly and/or quarterly. Without doubt, we fall under the non-profit religious institution category.

Other Factors

The "Door of Faith" broadcast is aired on more than one station, but only one station (WITN-TV7) is requiring captioning due to the operating income of 3 million dollars or more. The other stations we broadcast on are low-powered stations and were exempt from the captioning requirements.

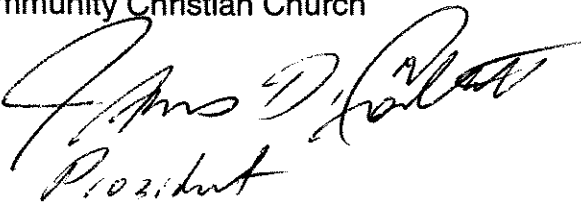
Conclusion

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 a 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 captions, a waiver under 79.1 (f) is warranted. If more information is needed, please contact me at the address provided below.

Respectfully submitted,

Community Christian Church

By:



James D. Corbett
President

James D. Corbett, Pastor, Executive Producer
1104 North Memorial Drive
Greenville, NC 27834

Phone: (252) 752-5683 Ext. 22

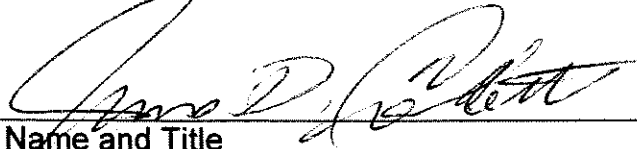
Fax: (252) 752-0315

Dated:

12/27/05

Declaration:

I, James D. Corbett, am Pastor of Community Christian Church and Executive Producer of the Door of Faith broadcast, and I have reviewed the Petition for Exemption for closed Captioning Requirements filed on behalf of Community Christian Church in this matter, and, upon information and belief, believe the statements regarding our organization and the Door of Faith broadcast to be true and accurate.

 President
Name and Title

12/27/05
Date

"Door of Faith" Television Broadcast

WITN

STATION	DATES	MESSAGE TITLES	TAPE NUMBER	TAPE OFFER #	LENGTH
WITN					
Sunday	1/2/05	The Marriage Covenant	JM110704B	713	28:28:00
Sunday	1/9/05	The Marriage Covenant	JM110704B	713	28:30:00
Sunday	1/16/05	The Marriage Covenant	JM110704B	713	28:30:00
Sunday	1/23/05	Ten Commandment: Part 1: Have No Other God Before Me	JM091204B	711	28:22:00
Sunday	1/30/05	Ten Commandment: Part 2: Thou Shall Have No Graven Image	JM091904B	711	28:24:00
WITN					
Sunday	2/6/05	Ten Commandment: Part 5: Honor Thy Mother and Father	JM101004B	711	28:29:00
Sunday	2/13/05	Ten Commandment: Part 5: Honor Thy Mother and Father-B	JM101004B	711	28:27:00
Sunday	2/20/05	Ten Commandment: Part 5: Honor Thy Mother and Father-C	JM101004B	711	28:22:00
Sunday	2/27/05	Ten Commandment: Part 5: Honor Thy Mother and Father-D	JM101004B	711	28:28:00
WITN					
Sunday	3/6/05	Resurrection from the Dream Killers	JE011605B	721	28:29:00
Sunday	3/13/05	Resurrection from the Dream Killers-B	JE011605B	721	28:28:00
Sunday	3/20/05	Resurrection from the Dream Killers-C	JE011605B	721	28:24:00
Sunday	3/27/05	Hosanna	JM032005A	731	28:25:00
WITN					
Sunday	4/3/05	The Father's Love-A	JE021305B	728	28:25:00
Sunday	4/10/05	The Father's Love-B	JE021305B	728	28:27:00

"Door of Faith" Television Broadcast

WITN

Sunday	4/17/05	The Healing Ministry of Jesus-A	JM112104B	729c	28:26:00
Sunday	4/24/05	The Healing Ministry of Jesus-B	JM112104B	729c	28:25:00
WITN					
Sunday	5/1/05	Walking in the Blessing of Abraham-C	JM010905B	722	28:24:00
Sunday	5/8/05	Church Life-Part 3a (Membership in the Local Church)	JM022005B	732c	28:20:00
Sunday	5/15/05	Church Life-Part 3b (Membership in the Local Church)	JM022005B	732d	28:26:00
Sunday	5/22/05	Church Life-Part 4c (A Portrait of the Church)	JM022705B	732d	28:29:00
Sunday	5/29/05	Church Life-Part 4d (A Portrait of the Church)	JM022705B	732d	28:29:00
WITN					
Sunday	6/5/05	Church Life-Part 6a (Finding Purpose and Meaning in Your Christian Walk)	JM030605B	732f	28:27:00
Sunday	6/12/05	Church Life-Part 6b (Finding Purpose and Meaning in Your Christian Walk)	JM030605B	732f	28:28:00
Sunday	6/19/05	Church Life-Part 6c (Finding Purpose and Meaning In Your Christian Walk)	JM030605B	732f	28:28:00
Sunday	6/26/05	What Happened the 3 Days/Nights Jesus was in the Grave-a	JM041005B	733a	28:30:00
WITN					
Sunday	7/3/05	Established in Sonship-a	JE061905A	740	28:20:00
Sunday	7/10/05	Established in Sonship-b	JE061905B	740	28:29:00
Sunday	7/17/05	Established in Sonship-c	JE061905B	740	28:30:00
Sunday	7/24/05	Working Out You Salvation-b	JM050105B	736b	28:28:00
Sunday	7/31/05	Working Out You Salvation-c	JM050105B	736b	28:28:00
WITN					
Sunday	8/7/05	You Shall Be Witnesses-B	JM051505B	737	28:27:00

"Door of Faith" Television Broadcast

WITN

Sunday	8/14/05	Christian Maturity-b	JM071005B	742b	28:28:00
Sunday	8/21/05	Christian Maturity-c	JM071005B	742b	28:28:00
Sunday	8/28/05	Finding Fulfillment in Your Service to the Lord-c	JM062605B	745b	28:24:00
WITN					
Sunday	9/4/05	When Your Ways Please God-c	JM073105b	748b	28:20:00
Sunday	9/11/05	When Your Ways Please God-d	JM073105B	748b	28:28:00
Sunday	9/18/05	When Your Ways Please God-e	JM073105B	748b	28:28:00
Sunday	9/25/05	When Life Seems Too Tough to Handle-a (add COLC)	JM073105B	748b	28:29:00
WITN					
Sunday	10/2/05	God Always Causes Us to Triumph-b	JM091105B	753c	28:28:00
WITN					
Sunday	10/9/05	God Always Causes Us to Triumph-c	JM091105B	753c	28:30:00
Sunday	10/16/05	Thou Shall Have No Other Gods-c	JM082105B	752	28:26:00
Sunday	10/23/05	Thou Shall Have No Other Gods-d	JM082105B	752	28:25:00
Sunday	10/30/05	Thou Shall Have No Other Gods-e	JM082105B	752	28:23:00
WITN					
Sunday	11/6/05	Growing Up in Christ-c	JM091805B	754a	28:25:00
Sunday	11/13/05	Growing Up in Christ-d	JM091805B	754a	28:24:00
Sunday	11/20/05	Growing Up in Christ-e (Part 2)	JM092505B	754b	28:30:00
Sunday	11/27/05	Be Ye Thankful (Thanksgiving Message)	JM112904A	NA	28:25:00
WITN					
Sunday	12/4/05	Growing Up in Christ-(Part 5)j	JM100905B	754e	28:25:00
Sunday	12/11/05	Growing Up in Christ-(Part 5)k	JM100905B	754e	28:30:00
Sunday	12/18/05	Spiritual Warfare-Part 1c	JM103005B	758a	28:25:00

202454
 COMMUNITY CHRISTIAN CHURCH
 1104 N MEMORIAL DRIVE
 GREENVILLE NC 27834

REP...: KEVIN SCOTT COLLIER
 SLSP.: COMMUNITY CHRISTIAN CHURCH
 ADV.: COMM CHRISTIAN CH/
 PROD: COMM CHRISTIAN CH/

ORDER TYPE	STANDARD	PAGE	1	BROADCAST MONTH	NOVEMBER
INVOICE NO.	51110022	SCHEDULE DATES	1/09/05- 1/08/06	CONTRACT YEAR	
BILLING INSTRUCTIONS					
STANDARD BROADCAST CALENDAR					

REF# :
 DESC :

SCHEDULE			ACTUAL BROADCAST				RECONCILIATION					
DESCRIPTION	PRICE	RT/SS#	PER	DATE	DAY	TIME	LENGTH	M/G FOR	PRODUCT DESCRIPTION	PRICE	REMARKS	DR/CR
6-630A	330	1	4	11/06	SU	06:00A				330		
				11/13	SU	06:00A				330		
				11/20	SU	06:00A				330		
				11/27	SU	06:00A				330		
<p>PERIOD COST</p> <p>PER CONFIRMATION 1,320.00</p>												
<p>We warrant that the actual broadcast information shown on this invoice was taken from the program log and will be available on request, for inspection by Advertiser or Agency for at least 12 months.</p>												
<p>standing to whom bills are rendered, Advertiser, Agency and Service, jointly and severally shall remain obligated to pay to station the amount of any bills rendered within the time specified, and until payment in full is received by station. Advertiser to Agency or to Service, shall not constitute payment to this</p>												
<p>4 TOTAL UNITS</p> <p>ACTUAL GROSS BILLING 1,320.00</p> <p>AGENCY COMMISSION .00</p> <p>NET DUE 1,320.00</p>												
<p>SUB-TOTALS</p> <p>TOTAL RECONCILING ITEMS .00</p>												

TERMS: DUE UPON RECEIPT

ORIGINAL

Internal Revenue Service

Department of the Treasury

**P. O. Box 2508
Cincinnati, OH 45201**

Date: September 1, 2000

Person to Contact:

Conrad Gillstrap 31-02830
Customer Service Specialist

Toll Free Telephone Number:

8:00 A.M. to 9:30 P.M. EST
877-829-5500

Fax Number:

513-263-3756

Federal Identification Number:

58-1483739

Greenville Community Christian Church, Incorporated
P.O. Box 968
Greenville, NC 27835-0968

Dear Sir or Madam:

This is in response to your request for a copy of your organization's determination letter. This will take the place of the copy you requested.

In December 1991 we issued a determination letter that recognized your organization as exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code. That letter is still in effect.

We classified your organization as one that is not a private foundation within the meaning of section 509(a) of the Code because it is an organization described in sections 509(a)(1) and 170(b)(1)(A)(i). This classification was based on the assumption that your organization's operations would continue as stated in your application. If your sources of support, character, method of operations, or purposes have changed, please let us know so we can consider the effect of the change on your organization's exempt and foundation status.

All exempt organizations (unless specifically excluded) are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more paid each employee during a calendar year. Your organization is not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

If your organization is a church or a qualified church-controlled organization as defined in section 3121(w)(3) of the Code, it may elect to exclude wages paid to its employees (other than for services performed in an unrelated trade or business) for social security taxes. This election must be made by filing Form 8274 by the day before the date the organization's first quarterly employment tax return would be due under the revised law. If your organization makes this election, its employees who earn \$100 or more during a calendar year become liable for the payment of the self-employment tax on the wages the organization pays them.

Donors may deduct contributions to your organization as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to your organization or for its use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Your organization is not required to file federal income tax returns unless it is subject to the tax on unrelated business income under section 511 of the Code. If your organization is subject to this tax, it must file an income tax return on the Form 990-T, Exempt Organization Business Income Tax Return. In this letter, we are not determining whether any of your organization's present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

Organizations that are not private foundations are not subject to the excise taxes under Chapter 42 of the Code. However, these organizations are not automatically exempt from other federal excise taxes.

(2)

Greenville Community Christian Church, Incorporated
58-1483739

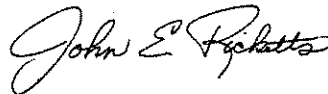
The law requires you to make available for public inspection a copy of your organization's exemption application, any supporting documents and the exemption letter to any individual who requests such documents in person or in writing. You can charge only a reasonable fee for reproduction and actual postage costs for the copied materials. The law does not require you to provide copies of public inspection documents that are widely available, such as by posting them on the Internet (World Wide Web). You may be liable for a penalty of \$20 a day for each day you do not make these documents available for public inspection.

Because this letter could help resolve questions about your organization's exempt status and foundation status, you should keep it with the organization's permanent records.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

This letter affirms your organization's exempt status.

Sincerely,

A handwritten signature in cursive script that reads "John E. Ricketts".

John E. Ricketts, Director, TE/GE
Customer Account Services

GREENVILLE COMMUNITY CHRISTIAN CHURCH INC
STATEMENT OF ACTIVITIES
FOR THE PERIOD ENDED: December 31, 2004

REVENUE:

Community Christian Church			
Tithes and Offerings	\$	1,549,815	
Interest Revenue			
Breakfast Sales		7,367	
Other Revenue		43,601	
Total Church Revenue		<u>43,601</u>	\$ 1,600,783
Community Christian Academy			
Tuition		125,192	
Donations			
Fees		39,581	
Lunch Sales		16,266	
Fundraising		2,248	
Other Revenue		11,225	
Total Academy Revenue		<u>11,225</u>	194,512
Community Christian Childcare			
Tuition		458,837	
Fees		12,894	
Fundraising		2,120	
Other Revenue		45,359	
Total Childcare Revenue		<u>45,359</u>	519,210
Building Fund			
Donations		3,345	
Pledges Paid		371,209	
Interest		239	
Other		51,086	
Total Building Fund Revenue		<u>51,086</u>	425,879
Community Christian Church Bookstore			
Book Sales		22,675	
Tape Sales		944	
Other Merchandise Sales		1,613	
Other		2,329	
Total Bookstore Revenue		<u>2,329</u>	27,560
Media			
Supplements		21,972	
Offerings		4,012	
Door of Faith Donations		384	
Other Revenue		1,210	
Total Media Revenue		<u>1,210</u>	27,578

GREENVILLE COMMUNITY CHRISTIAN CHURCH INC
STATEMENT OF ACTIVITIES
FOR THE PERIOD ENDED: December 31, 2004

Special Events		
Payments for Events	48,344	
Other Revenue	10,924	
Total Special Events Revenue		<u>59,268</u>
Total Revenues		<u><u>\$ 2,854,791</u></u>

OPERATING EXPENSES:

Church Activities:		
General and Administrative Expenses	\$ 813,930	
Salary and Wages Expense	727,516	
Honorariums	35,850	
Missions and Outreach	5,350	
Benevolence	10,540	
Gifts to Other Ministries	2,070	
Total Church Expenses		<u>\$ 1,595,257</u>
Community Christian Academy		
General and Administrative Expenses	76,975	
Salary and Wages Expense	119,538	
Total CCA Expenses		196,513
Community Christian Childcare		
General and Administrative Expenses	209,089	
Salary and Wages Expense	307,706	
Total CC Childcare Expenses		516,796
Building Fund		
Salary and Wages Expense	126,404	¹
Construction Costs	316,171	²
Fundraising Expenses	13,463	
Gifts to Other Ministries	9,450	
Other	98	
Total Building Fund Expenses		465,587
Community Christian Church Bookstore		
Inventory	9,692	
Supplies	6,719	
Equipment	572	
Other	11,510	
Total Bookstore Expenses		28,492
Media		
Radio Airtime	3,756	
TV Airtime	21,860	
Other	1,032	
Total Media Expenses		26,648

GREENVILLE COMMUNITY CHRISTIAN CHURCH INC
STATEMENT OF ACTIVITIES
FOR THE PERIOD ENDED: December 31, 2004

Special Events		
Events	43,857	
Guest Speaker Honorariums	5,225	
Other Expenses	11,609	
Speakers Expense	1,750	
Supplies	2,046	
Total Special Events Expenses	<u>64,486</u>	<u>64,486</u>
Total Expenses		<u><u>\$ 2,893,779</u></u>
Net Changes in Assets		<u><u>\$ (38,987)</u></u>

Note 1

These expenses were associated with work performed for the building campaign

Note 2

The construction cost includes contractor administrative fees and materials (steel) and retainer fees

GREENVILLE COMMUNITY CHRISTIAN CHURCH INC
STATEMENT OF ACTIVITIES
FOR THE PERIOD ENDED: October 31, 2005

REVENUE:

Community Christian Church			
Tithes and Offerings	\$390,054		
Breakfast Sales	2,400		
Other Revenue	39,612		
Total Church Revenue			\$432,067
Community Christian Academy			
Tuition	\$39,881		
Donations	0		
Fees	19,301		
Lunch Sales	5,270		
Fundraising	0		
Other Revenue	781		
Total Academy Revenue			\$65,232
Community Christian Childcare			
Tuition	\$131,387	1	
Fees	8,997		
Fundraising	0		
Other Revenue	11,096	2	
Total Childcare Revenue			\$151,479
Building Fund			
Donations	\$71,327	3	
Interest	0		
Total Building Fund Revenue			\$71,327
Community Christian Church Bookstore			
Merchandise Sales	\$6,334		
Total Bookstore Revenue			\$6,334
Special Events			
Payments for Events	\$17,321		
Other Revenue	0		
Total Special Events Revenue			\$17,321
Total Revenues			\$743,760

OPERATING EXPENSES:

Church Activities:			
General and Administrative Expenses	\$250,042		
Salary and Wages Expense	229,538		
Honorariums	26,140		
Missions and Outreach	3,200		
Benevolence	485		
Total Church Expenses			\$509,405
Community Christian Academy			

GREENVILLE COMMUNITY CHRISTIAN CHURCH INC
STATEMENT OF ACTIVITIES
FOR THE PERIOD ENDED: October 31, 2005

General and Administrative Expenses	\$26,252	
Salary and Wages Expense	37,945	
Total CCA Expenses		\$64,197
Community Christian Childcare		
General and Administrative Expenses	\$60,423	
Salary and Wages Expense	112,022	
Total CC Childcare Expenses		\$172,444
Building Fund		
Bank Charges	\$45	
Expenses	0	
Total Building Fund Expenses		\$45
Community Christian Church Bookstore		
Inventory	\$5,500	
Other	0	
Total Bookstore Expenses		\$5,500
Media		
Bank Fees	\$9	
Total Media Expenses		\$9
Special Events		
Events	\$10,704	
Total Special Events Expenses		\$10,704
Total Expenses		\$762,304
Net Changes in Assets		(\$18,543)

Note 1

Includes private pay and third-party agency payments

Note 2

Includes Food Program supplement for \$14,130.26

Note 3

Contributions received through Sunday offerings

Sharon Watford

From: Carolinas Captioning [carolinascaptioning@carolina.rr.com]
Sent: Tuesday, November 29, 2005 7:47 AM
To: scwatford@earthlink.net
Subject: Your captioning quote

Good morning, Sharon, below is your captioning quote and description per our phone conversation yesterday.

I appreciate the time you took to listen to Carolinas Captioning's abilities.

Realtime Display for half-hour program:

This is what you see when you turn on CNN. It is a captioner listening to the audio and writing live to the tape/TV.

There are some errors, but our captioners have 98.9% accuracy. This is how most church services are being captioned.

The rate is \$75 for the half hour. Client is to provide tape stock and any materials that can be used to help the captioner prepare for the program, i.e., church bulletin, pastor's sermon outline, and song titles/lyrics.

Post-Production, roll-up captioning:

This is a more finished product, virtually error free. The tape is listened to several times to create a script and then captions are laid on the tape in a roll-up fashion, 3 lines or 2 lines, at the top or bottom of the screen. This is a much more time-consuming process.

The rate is \$225 for a half-hour program. Client is to provide tape stock and any materials that can be used to help with spellings.

Again, Sharon, I do appreciate your call. Please don't hesitate to email or call with any further questions you may have.

I know you said you have a meeting today where the captioning issue will be discussed. If questions arise during that meeting, please call. Have a wonderful day.

Christine Woods
704.552.6753
email: info@carolinas-captioning.com
www.carolinas-captioning.com

