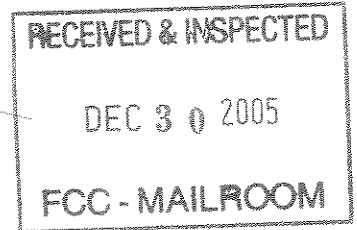


CCB-CC-0133

Apostle Dell Young
Senior Pastor



"built upon the foundation of the apostles and prophets, Jesus Christ himself being the chief cornerstone" - Ephesians 2:20



December 28, 2005

Federal Communications Commission
445 12th Street SW
Washington, DC 20554
Att. Secretaries Office

Dear Sir or Madam,

Cornerstone Connection, the media ministry of Cornerstone Christian Church in Sparks, Georgia is requesting exemption from closed captioning requirements based upon section 79.1 of the Commission's rules.

At this time compliance would impose an **undue burden** upon Cornerstone Ministries under Part 79.1 for the following reasons:

Cornerstone Ministries current annual gross budget falls far under the \$3,000,000 mark as you will see from the attached profit and loss statement. Our media ministry is not currently budgeted for such an increase in production costs and compliance would severely handicap our current television ministries already extremely tight budget.

Cornerstone is a donor supported; non-profit ministry and compliance would impose an undue burden and make production costs unaffordable. Our cost for closed captioning would almost double our current media ministry expense and could cause us to have to terminate our media ministry.

As we are a ministry and reaching people is our main goal. We do fully intend to be sensitive to the needs of the hearing impaired and it is our desire that as our ministry attains the finances to support such an endeavor that we begin closed captioning at that time. We are currently a small media ministry reaching small markets in South Georgia through three local television stations and do not have the thousands of extra dollars needed to buy the necessary equipment or outsource such a task.

Again we ask that you review our request for exemption from current closed captioning laws based upon the undue burden that it would place upon our ministry at this time.

Blessings,

Justin Young
Executive Pastor

CORNERSTONE CHRISTIAN CHURCH INC
Income Statement - CORNERSTONE CHRISTIAN CHURCH
For the Period Ended November 30, 2005

11 Months Ended
Nov. 30, 2005

Revenue		
INCOME : YOUTH	\$	124.00
INCOME: TITHES & OFFERINGS		1,116,217.27
INCOME: RESOURCES TABLE		2,690.79
SALES RETURNS & ALLOW		<u>(672.46)</u>
Total Revenue		<u>1,118,359.60</u>
Gross Profit		1,118,359.60
Operating Expenses		
PURCHASES: SUPPLIES & ETC		30,701.93
PURCHASES: LITERATURE		1,510.00
PURCHASES-YOUTH		3,515.97
TELEPHONE EXPENSE		7,836.11
UTILITIES EXPENSE		18,821.53
REPAIRS EXPENSE		25,114.46
MAINTENANCE EXPENSE		14,462.81
INSURANCE EXPENSE		38,735.75
HOUSING ALLOWANCE		51,228.71
OTHER SALARIES EXPENSE		32,448.53
PASTOR'S SALARY EXPENSE		184,213.42
REVIVAL COST		1,100.00
OTHER MINISTRY EXPENSE		40,325.69
ADVERTISING EXPENSE		70,088.59
CONTINUING ED-CONFERENCES		7,230.00
FLOWERS		2,170.98
PAYROLL TAX EXPENSE		2,598.47
CITY & COUNTY TAX EXPENSE		157.07
TRANSPORTATION EXPENSE		8,393.08
TRAVEL (MOTELS & ETC)		11,276.76
BENEVOLENT FUND & GIFTS		11,802.29
DUES & PUBLICATIONS EXP		606.97
BANK SERVICE CHARGES		230.77
INTEREST EXPENSE		(121.13)
LEGAL & ACCTG EXPENSE		8,230.44
POSTAGE EXPENSE		4,635.05
MISSIONS EXPENSE		13,239.67
OPERATING SUPPLIES EXP.		9,387.88
OFFICE SUPPLIES EXPENSE		14,603.19
RENTAL & LEASE EXPENSE		21,468.56
LICENSE & REGISTRATION		651.58
MISCELLANEOUS LABOR (NEC)		2,612.00
UNIFORM & LAUNDRY EXPENSE		2,433.90
MEALS & ENTERTAINMENT		6,752.76
FELLOWSHIP ENTERTAINMENT		<u>1,226.29</u>

THE THOMAS LAW FIRM, P.C.

P. O. BOX 540
102 N. HUTCHINSON AVE.
ADEL, GEORGIA 31620

TOM W. THOMAS, SR.
TOM W. THOMAS, JR.

(229) 896-2278
FAX: (229) 896-2279

March 16, 2006

Ms. Amelia Brown
Disability Rights Officer
Federal Communication's Commission
445 12th Street Southwest
Washington, D.C. 20554

RE:CGB-CC0133

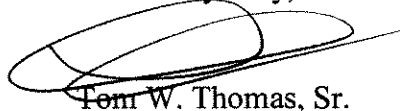
Dear Ms. Brown:

I enclose copy of your letter of February 14, 2006 to Cornerstone Christian Church.

I enclose for your review one original and two copies of affidavit of Pastor Dell Young and Timothy Pecoraro. As you can see the church is quite diversified in its ministry. It would create an undue economic burden and eliminate funds for other ministries if the church does not receive the exemption from closed caption.

Thanks for your consideration.

Yours very truly,



Tom W. Thomas, Sr.

TWTSr:ed

Enclosures



Federal Communications Commission
Washington, D.C. 20554

February 14, 2006

Reference: CGB-CC-0133

Cornerstone Christian Church
Pastor Justin Young
403 Cleveland Street
P.O. Box 618
Sparks, GA 31647

Dear Pastor Young,

The Federal Communications Commission received the petition you filed on behalf of Cornerstone Christian Church, seeking an exemption from the closed captioning requirements for its programming based on the undue burden standard found in Section 79.1(f) of the rules.

Without addressing the merits of your petition for exemption based on the undue burden standard, we note that it is incomplete because, among other things, it does include the nature and costs associated with captioning the show and it does not explain reasonable alternatives to captioning, if any. Your petition must be supported by sufficient evidence to demonstrate that compliance would cause significant difficulty or expense. Your petition also must be, but is not, supported by affidavit. Without this documentation, which is required under the Commission's rules, it is impossible for the Commission to determine whether Cornerstone Christian Church has sufficiently justified an exemption from the closed captioning requirements for its programming.

We request that you promptly supplement the petition with the requested information and support it by affidavit. To assist you in supplementing your petition, enclosed is a copy of the Commission rule governing the filing and processing of petitions for exemption from the closed captioning requirements. Additional information also is available on the web at www.fcc.gov/cgb/dro/caption_exemptions.html.

With regards to the statement that your "annual gross budget falls far under the \$3,000,000 mark," we note that Section 79.1(d)(12) states, "[n]o video programming provider shall be required to expend any money to caption any channel of video programming producing annual gross revenues of less than \$3,000,000 during the previous calendar year other than the obligation to pass through video programming already captioned when received pursuant to paragraph (c) of this section." Because you are claiming an exemption for an individual video program, not a channel of video programming, the specific \$3,000,000 general revenue exemption of Section 79.1(d)(12) does not appear to apply to your particular circumstances.¹

¹ *In the Matter of Maranatha Fellowship Church Video Programming Accessibility, Petition for Waiver of Closed Captioning Requirements, CSR 6308, Memorandum Opinion and Order, DA 05-1706, 2005 WL 1475352 (Media Bureau June 22, 2005).*

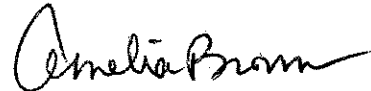
Please note that your petition remains pending. Pursuant to the Commission's rules, while your petition is pending before the Commission, the video programming that is the subject of the petition is considered exempt from the closed captioning requirements.

Please include the case identifier number CGB-CC-0133 in all correspondence with the Commission regarding this matter. Please send an original and two copies of the supplementary material to

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

Please follow the directions found on the above website for mailing or delivering materials to the Commission. Any inquiries regarding this matter should be directed to Amelia Brown at (202) 418-2799 (voice), (202) 418-7804 (TTY), or Amelia.Brown@fcc.gov. Please refer to the case identifier number in any email correspondence or phone conversations with Commission staff.

Sincerely,



Amelia Brown
Senior Attorney
Disability Rights Office
Consumer & Governmental
Affairs Bureau

AFFIDAVIT

GEORGIA, COOK COUNTY

Before me, the undersigned officer, duly authorized under the laws of the State of Georgia to administer oaths, personally appeared **DELL YOUNG**, who, after oath was duly administered, deposes and on oath states the following:

That I am senior pastor of Cornerstone Christian Church, Inc. We are a 15 year old church with a membership of 280 people consisting of blacks, whites and hispanics. The church is located in Sparks, Georgia whose population is 1755 people.

That we are quite diversified in our ministry, trying to reach the world for Christ, but our major thrust is the area in which we are located. Our ministry includes the following with the cost associated therewith: Missionaries, TV, Radio, Benevolence, Prison, Rehabilitation, - \$99,800.00 in 2005; Youth, Children, Men's, Lady's, Divorce Care, Single's, Pregnancy Crisis, Help's (Food Pantry) - \$9,300.00 in 2005. In addition, we operate a school for K-12 grades at a cost to the church of \$129,000.00 in 2005.

That our TV ministry is on three TV stations, Savannah - 8:00 a.m. Sunday morning, Albany - 7:00 a.m. Sunday morning, and Valdosta 12:00 a.m. Thursday midnight. We don't offer closed caption because the cost would be

an undue economic burden. However, we do utilize lower thirds on screens throughout the show emphasizing scripture references, as well as contact information and main points throughout the broadcast. Our commercials are also very text heavy, which allows the hearing impaired to be able to comprehend the products, special events etc. that we offer.

This the 16th day of March, 2006.

Dell Young LS
DELL YOUNG

Sworn to and subscribed
before me, this 16th day
of March, 2006.



N.P.

My Commission Expires: _____

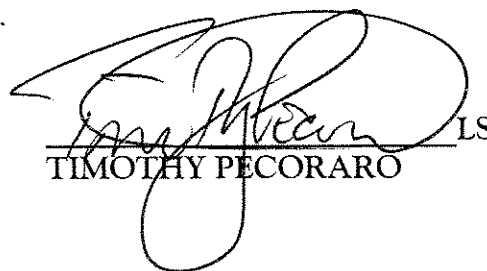
AFFIDAVIT

SIMPSONVILLE, SOUTH CAROLINA

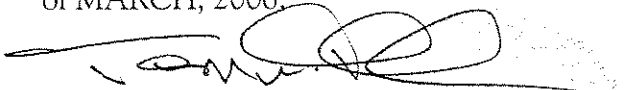
Before me, the undersigned officer, duly authorized under the laws of the State of Georgia to administer oaths, personally appeared **TIMOTHY PECORARO**, who, after oath was duly administered, deposes and on oath states the following:

That I am president and CEO of Peculiar Production's and my company handles the television editing and production for Cornerstone Christian Church, Inc. The current cost per week for the production is \$320.00 not including any closed caption. The cost for the closed caption will be an additional \$310.00 per broadcast per week for a total additional cost of \$16,120.00 per year.

This the 14th day of March, 2006.


TIMOTHY PECORARO LS

Sworn to and subscribed
before me, this 14th day
of MARCH, 2006.


N.P.
My Commission Expires: _____
