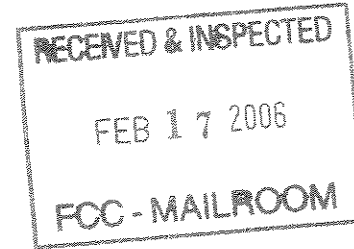


CGB-CC-0439



February 16, 2006

Commission's Secretary
Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
9300 East Hampton Drive
Capitol Heights, MD 20743

Dear Secretary:

Please accept this document and the enclosed affidavit as a petition for exemption from Section 79.1 of the Commission's rules, implementing Section 713 of the Communications Act of 1934, as amended on the basis of undue hardship.

Type of Service Provided

WOUB Public Television is a non-commercial station licensed to Ohio University. All of WOUB's pledge programming is broadcast with closed caption with the exception of the live segments, or pledge breaks, during fundraising pledge drives. Pledge breaks that are produced and distributed from a national level are close captioned. Local pledge breaks make up less than 10% of our total programming during an average pledge drive.

Pledge breaks are from 2.5 to 11.5 minutes in duration and occur before, after and during pledge programming.

In addition to broadcasting of television programming, WOUB provides training to students of Ohio University, GED on TV programming, interconnected classrooms, outreach services in the form of Ready to Learn workshops, programming to be used in the classrooms, collaborative efforts in local public service events and much more.

Financial hardship

WOUB receives revenue in the form of CPB grants, local support through collaboration with ETech Ohio, eTSEO and other state agencies, Ohio University,



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AFFIDAVIT

The information stated in the accompanying petition is true to the best of my knowledge.

Jeanne Jeffers 2-16-06
Jeanne Jeffers Date

Carolyn B. Lewis 2-16-06
Carolyn B. Lewis Date

Notary Public State of Ohio

Conni Lu Smith My Commission Expires 9/15/2007

member and underwriting support, and other miscellaneous receipts. Last year WOUB TV recorded over \$7 million in gross revenues (direct and in-kind support) but a significant portion of those revenues were tied to grants for equipment and implementation of digital transmission.

Last year WOUB realized approximately \$315,000 in fundraising (membership and underwriting) revenues. For FY2007, WOUB is anticipating at least a 12% reduction in Ohio University support and other potential cuts from State and Federal sources. It is crucial that we maximize our private fundraising abilities. Inquiries regarding closed captioning costs resulted in an estimate of \$160.00 per hour for services outside the station. This would require a variation of turn around time in order to tape live, outsource the production for closed captioning in order to replay. The cost multiplies in order to have this service done in real time.

During our December 2005 drive, WOUB had 81+ hours of pledge breaks (not total pledge programming) with about 20% of that being locally produced and taped live for repeat programming. If this were done in real time at double the cost, the result would be a bill of over \$5,000. The total dollars pledged during December was \$39,723. That cost would represent 13% of our fundraising for that pledge drive. This does not include the cost of the equipment necessary to accomplish this service.

Station Impact

The impact to the station would be significant. With a decrease in funding from Federal, State, and local sources and a decrease in private funding the station would be forced to reduce services to the region that we cover. This may result in employee lay-offs, reduced broadcast hours, reduced outreach services to the region, or other detrimental actions.

This exemption will allow us to maintain our local presence, which is critical during fundraising drives.

Available Alternatives

During the live breaks, we have graphic screens that use script and images to explain how to pay for your pledge, pictures of thank you gifts available and the dollar amounts associated with those gifts, and screens thanking volunteer groups and supporters (example: Tonight's phone volunteers are The Athens AM Rotary Club. Example: Thank-you Pepsi for providing refreshments for volunteers.) We also have automated lower-third crawls that provide message points and a continuous phone number is displayed. (example: WOUB is viewer supported Public Television, Please pledge now to support the programming you enjoy on WOUB. WOUB is committed to providing local programming for the region. Your support now keeps the quality programming you enjoy on WOUB.)

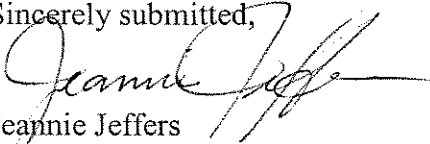
Other Factors

The live segments constitute un-scripted appeals made by WOUB staff and volunteers encouraging viewers to become members of the station by donating money to the station. These appeals follow an outline but rely on the ability to make situational or impromptu appeals. For example: An individual standing in front of a county map of our coverage area, which has flags placed in each county representing each pledge received from that county, may say "we just received a call from Adams County, challenging other Rotary members to make a pledge to WOUB". We also read the names of people who make pledges during our live breaks unless they would prefer that we do not.

These impromptu appeals have proven to be effective incentives that enhance our fundraising ability by connecting with our audience on a "local" level. We're not just some TV station but their local Public TV station. Obviously these impromptu appeals may stray from the message points that are running on the lower third of the screen, but they are within the spirit of the message of local programming for the local population.

Thank you for your consideration of this appeal which will allow us to maintain our local presence during fundraising campaigns.

Sincerely submitted,



Jeannie Jeffers
Membership Manager



Carolyn B. Lewis
Director and General Manager