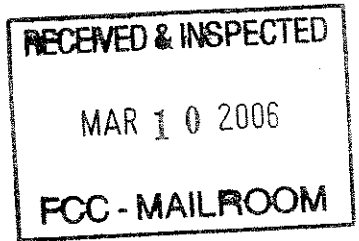


CGBCC-0467

A. D. BURNS

Reaching, Teaching & Preaching A Word of Faith

MINISTRIES



March 6, 2006

FCC
Attn: Secretary's Office
Closed Captioning
445 12th Street SW
Washington, DC 20554

RE: REQUEST FOR EXEMPTION FROM COMMISSIONS'S CLOSED CAPTIONING RULES

A.D. Burns Ministries is on local TV once a week for 30 minutes with a program known as Reaching The World Through Faith. The purpose of this petition is to request an exemption from the Closed Captioning Requirements, under Section 79.1 of the Commission's rules, 47 C.F.R. and 79.1. We believe our program, "Reaching The World Through Faith", qualifies for exemption for the following reasons:

Part 79.1 Section (D)

Item (8) "Reaching The World Through Faith" is a locally produced and distributed non-news program. The program is of local public interest, is not a news program, and the "electronic news room" technique of captioning is unavailable.

Part 79.1 - Section (F)

Compliance would impose an undue burden to A.D. Burns Ministries for the following reasons:

1. It would be necessary to send the programs to an outside source for captioning. This would impact meeting airdate deadlines and the added production cost would make production unaffordable.
2. A.D. Burns Ministries would have to consider discontinuing our program and cease broadcast operations.
3. A.D. Burns Ministries is a donor supported, non-profit organization and the added cost would be an undue burden on the ministry at this time.
4. A.D. Burns Ministries total income from all sources is less than \$ 22,000.00 per year.
5. *Program Scheduling.* The ministry show is filmed once per week. Filming requires one full day, while editing takes another 4 or 5 days. Each show is distributed by Wednesday for airing the following Sunday. The very essence of the show is providing timely information. The addition of closed captioning to the production schedule would mean that each show would air two or three weeks after filming. The delay would significantly reduce the value of the information the show provides our viewers. The time required for closed caption would eliminate that element of being current that the viewers expect from the programming.
6. *Workload.* With the activities of filming, producing, editing and distributing the show each week, an additional staff person would have to be hired, at least on a part-time basis, to insure audio translation accuracy. Again, budgetary constraints do not allow for the additional expense.

As shown by this Petition, the Commission should grant a full exemption of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The cost of captioning would be excessively high, and would substantially increase the ministries operating loss. As a consequence, and because of our limited assets, the ministry may have to consider ceasing operations if it is forced to bear the expense of closed captioning. The ministry type of operation and financial resources are different in kind and magnitude from a mainstream program provider. Because of the significant difficulty and expense of providing closed captions, a full exemption under 79.1(f) is warranted.

A.D. Burns Ministries was formed in 2003 and purchased a 30-minute program currently aired regionally in Milwaukee, Wisconsin. The show's staff consists of volunteers. The only paid person is an independent contract worker who answers phones, and tracks donors. The cost of closed captioning is proof reading for accuracy, which would require a minimum of 1 hour to ensure the text matches the audio. This cost at \$37.50 per hour per week would be \$1,950 annually as well as the \$400.00 per week and \$20,800 annually for outsourcing for the captioning. Therefore, the total annual cost for closed captioning is estimated to be \$22,750.00. Gross revenue in 2005 was approximately \$ 16,304.10, and a deficit of \$5,511.50 was donated by Jericho Church Without Walls. (See financial statement) Expenses as detailed below, were approximately \$21,815.00.

Television Broadcast	\$ 16,380.00
Administration	\$ 3,150.00
Operations	\$ 1,685.60
Partnership	<u>\$ 600.00</u>
	\$ 21,815.60

Closed Captioning	<u>\$ 22,750.00</u>
-------------------	---------------------

APPROXIMATE TOTAL ANNUAL COST \$ 44,565.60

If more information is needed, please contact the undersigned at the address listed below.

Again we respectfully request that A.D. Burns Ministries be exempted from the closed captioning requirement for the above stated reasons. We may be reached at:

A.D. Burns Ministries
Attn: Anthony D. Burns
1923 North 12th Street
Milwaukee, Wisconsin 53205
414-562-8767

Sincerely,



Rev. Anthony D. Burns

A. D. BURNS

Reaching, Teaching & Preaching A Word of Faith

MINISTRIES

Affidavit of Costs

I, Rev. Anthony D. Burns, President of A.D. Burns Ministries, by my signature affixed to this document, do hereby make the following statement of fact and affirm:

1. Total income of A.D. Burns Ministries, including all sources is \$21,900.00.
2. The amount paid to WCGV for the weekly show is the sum of \$315.00 per week, total expenditure for television show is \$16,380.00 yearly.
3. All other costs involved in the television show are performed by myself and members of the church with no charge.
4. The income of A.D. Burns Ministries is so small that salaries are not paid to its ministers.
5. Captioning costs would average \$437.50 per weekly show.
6. Total members in A.D. Burns Ministries is approximately 50.

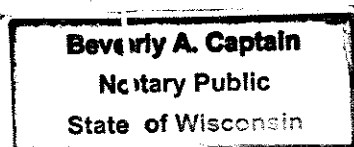
I now affix my signature to these affirmations:

Rev. Anthony D. Burns

Rev. Anthony D. Burns
President

The foregoing was subscribed and sworn to me, a Notary Public, of the State of Wisconsin, County of Milwaukee this 9
day of March, 2006.

Beverly A. Captain
Notary Public




A.D. Burns Ministries
Financial Statements
For the period ended December 31, 2005

To the Board of Directors:

A.D. Burns Ministries
1923 North 12th Street
Milwaukee, WI 53205

We have compiled the accompanying balance sheet of A.D. Burns Ministries as of December 31, 2005, and the related statements of income, retained earnings, and cash flows for the period then ended (and supplementary information), in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.

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


Michael Peavy

Milwaukee, WI 53223
March 8, 2006

A.D. Burns Ministries
Table of Contents
December 31, 2005

	PAGE
ACCOUNTANT'S REPORT	
BALANCE SHEET	1
STATEMENT OF INCOME AND RETAINED EARNINGS	2
STATEMENT OF CASH FLOWS	3
NOTES TO FINANCIAL STATEMENTS	4

A.D. Burns Ministries
Balance Sheet
December 31, 2005

Assets	
Total Assets	\$ <u>.00</u>
Liabilities and Stockholders Equity	
Long-term liabilities	
Long-term debt	5,511.50
Stockholders Equity	
Retained earnings	(5,511.50)
Total Liabilities and Stockholders Equity	\$ <u>.00</u>

See accompanying accountant's compilation report.

A.D. Burns Ministries
Statement of Income (Loss) and Retained Earnings
For the period ending December 31, 2005

Operating revenue	16,304.10
Sales	
Cost of goods sold	<u>3,150.00</u>
Purchases	13,154.10
Gross profit/(loss)	
Operating expenses	
Office expenses	40.95
Other expenses	16,980.00
Utilities	<u>778.23</u>
Total Operating expenses	17,799.18
Income/(loss) from operations	(4,645.08)
Other expenses	
Other expenses	<u>866.42</u>
Net income/(loss)	<u>(5,511.50)</u>
Retained earnings, ending	\$ <u>(5,511.50)</u>

See accompanying accountant's compilation report.

A.D. Burns Ministries
Statement of Cash Flows
For the period ending December 31, 2005

Cash flows from operating activities:	
Net Income/(Loss)	\$ (5,511.50)
Adjustments to reconcile net income/(loss) to net cash provided by (used in) operations:	
Cash flows from financing activities:	
Repayments on long-term debt	<u>5,511.50</u>
Net cash provided by (used in) financing activities	5,511.50
 Net Increase(Decrease) in Cash	 .00
 Cash at Beginning of Period	 <u>.00</u>
 Cash at End of Period	 \$ <u><u>.00</u></u>

See accompanying accountant's compilation report.

A.D. Burns Ministries
Notes to Financial Statements
December 31, 2005

Accounting Policies

1. *Cash and Cash Equivalents:* Cash and cash equivalents consist of cash, bank deposits and temporary cash investments with a maturity of three months or less when purchased.
2. *Other Securities:* Other securities consist of marketable securities stated at cost which approximates market.
3. *Inventories:* Inventories are stated at lower of cost or market, with cost generally determined on a first-in, first-out basis.
4. *Other Assets:* Other assets include goodwill, patents, other intangibles and other noncurrent assets. Goodwill is generally amortized on a straight-line basis over 10 years. Other items are amortized on a straight-line basis over their estimated economic lives.
5. *Depreciation:* Depreciation of property, plant and equipment is generally computed on a straight-line basis over the estimated useful lives of these assets.