

CGB - CC - 0495

COPY

Doug Houston & Associates, Inc.
3315 Demetropolis Road, Suite 307
Mobile, AL 36693
251 - 602 1919

RECEIVED & INSPECTED
APR 5 2006
FCC - MAILROOM

March 31, 2006

Federal Communications Commission
Attention: CGB Room 3-B431
445 12th St, Southwest
Washington, DC 20554

Re: Request for Full and Exemption from Close Captioning Requirements

Ladies and Gentlemen:

Doug Houston & Associates, Inc. hereby files its request for an exemption from the closed captioning rules pursuant to 47 C.F.R. § 79.1 on the basis of undue burden.

Preliminary Statement

Doug Houston & Associates, Inc. is a company with one employee. It was formed in 1999 (year) for the express purpose of creating, filming, and broadcasting a hunting and fishing television show known as Doug Houston Outdoors. The primary objective of the enterprise is to educate sportsmen in the local viewing area about fishing and hunting conditions, techniques, etc.

During a calendar year, 52 (#) television shows are filmed and broadcasted. For the past three years, the gross income from this enterprise, which is solely from advertising, was as follows:

2003:	\$ <u>6,850.00</u>
2004:	\$ <u>47,399.67</u>
2005:	\$ <u>32,193.60</u>

The average production costs for the show for the past three years averaged \$ 18,050.00. These are exclusive of an employee salary of \$ 0 for each of the three years.

Closed Captioning

We have investigated the costs involved in providing closed captioning for the show. They are in excess of the net income for 2003, 2004, and 2005. The costs include charges for captioning, editing, and shipping of the media to and from the captioner. The approximate cost for this process would be \$ 15,600.00, which would leave an approximate net loss to the business of 16,593.00 in 2005.

In calendar year 2006, it is estimated that the captioning expense would also create a net loss for the company. Income is projected as \$30,000.00, and expenses net of salary are expected to be \$ 7,500.00.

Company Financial Resources

The assets of the company are:

Cash	\$ <u>0.00</u>
Filming Equipment	\$ <u>5,000.00</u>
Library of Tapes	\$ <u>2,000.00</u>
Sports Equipment	\$ <u>0.00</u>

As noted above, the sole source of revenue is television advertising. [IF THERE IS INCOME FROM SALES OF THE TAPES, THEN IT NEEDS TO BE IDENTIFIED HERE] The Company always has actively sought additional advertising revenue; however other local broadcast shows actively and competitively compete for the available dollars.

The television station that broadcasts the shows is not willing to bear the cost of closed captioning. See the attached [email, letter, etc] from WB55.

Adverse Impact on Viewers

The company seeks to provide timely information to its viewers about the various hunting and fishing seasons as well as the current "hot spots" for finding game. Closed captioning takes at least a week to accomplish and by that time much of the program's information is of little benefit to the viewer.

Alternatives to Closed Captioning

The company does already provide [OR WILL PROVIDE] as an alternative to closed captioning large identifying graphics of the fish or game. Identifying information can be [ARE] displayed and maps of the relevant area where the game is caught is [WILL BE] displayed as well.

Petitioner submits that the Commission should grant a full exemption of the closed captioning requirements because of the undue burden it causes. In particular, the expense of the enterprise combined with the limited assets of the company may require the business to shut down if the exemption is not granted.

Should you have any questions concerning the foregoing, please contact me. Thank you for your consideration.

Sincerely yours,



Douglas Houston,
President

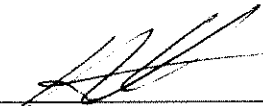
AFFIDAVIT

MOBILE, ALABAMA

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

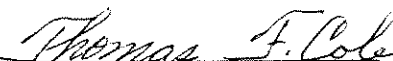
That I am the President of Doug Houston Outdoors and my company handles the television editing and production for Doug Houston Outdoors. The current cost per week for production is \$300.00 not including any closed caption. The cost for closed caption will be an additional \$ 300.00 per broadcast per week for a total additional cost of \$15,600.00 per year.

This the 31st day of March 2006



Doug Houston, President

Sworn to and subscribed
Before me, this 31st day
of March, 2006



N.P.

My commission Expires: June 26, 2008
NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: June 26, 2008
BONDED THRU NOTARY PUBLIC UNDERWRITERS