

046-10-0513

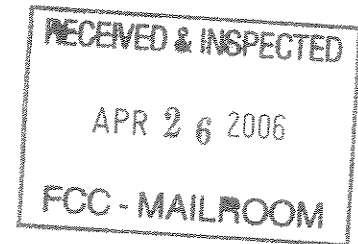
"Reaching  
America..."

**RALPH SEXTON**  
MINISTRIES

"...To Reach  
The World"

April 4, 2006

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



**RE: REQUEST FOR EXEMPTION FROM COMMISSION'S CLOSED CAPTIONING  
RULES**

Ralph Sexton Ministries is a non-profit evangelistic ministry which airs a 28 minute 30 second broadcast entitled, "Restore the Landmarks" airing on WLOS Asheville, NC at 7:30 A.M. on Sundays. The broadcast is essentially for homebound individuals to have the opportunity to view a worship service. The ministry is funded primarily by contributions from individuals, churches, and board members and does not solicit contributions in the broadcast. Due to the limited finances and employee resources of this ministry, we request the FCC consider waiving closed captioning requirements for this broadcast.

We were notified of the regulation in December of 2005, and were given little time to research resources for closed captioning. After notification, the station then claimed closed captioning for our broadcast was not necessary. Then the station said they would provide the captioning. Finally, the ministry was notified it would be responsible for captioning the weekly broadcast. This station's confusion made it difficult to begin and complete the process by the government deadline. Upon further investigation of both the equipment and necessary manpower, providing closed captioning would create an undue burden on the ministry which would result in many who watch losing the opportunity to worship.

This petition seeks relief from the Closed Captioning ruling based on Part 79.1 section (F). Compliance would cause an undue burden to Ralph Sexton Ministries in the following ways:

1. If the program were sent to an outside source for captioning, the cost would be approximately \$700 weekly (\$36,400 annually). If the program were captioned in house, the software and equipment would cost approximately \$15,000. In addition, a full time staff member would need to be hired to complete the task.
2. The broadcast is made possible by unsolicited contributions and monthly support.

RALPH SEXTON MINISTRIES

P.O. Box 6465 • Asheville, NC 28816 • 1-800-293-0808

3. The cost for the broadcast per week, including airing and post production editing, is \$1650.00 (\$85,800 annually). Adding the additional captioning cost would prohibit the broadcast entirely.
4. Ralph Sexton Ministries' total annual income is \$127,924.53. According to the FCC report and order on captioning, "Providers with less than \$3,000,000 in gross annual revenue will not be required to spend any money to caption programming."

We respectfully request permanent exemption from the closed captioning rule. For any questions, please contact us at:

Ralph Sexton Ministries  
566 Old County Home Road  
Asheville, NC 28806  
828-281-2160

Sincerely,

Dr. Ralph Sexton, Jr.

Enclosure: Affidavit of Cost

"Reaching  
America..."



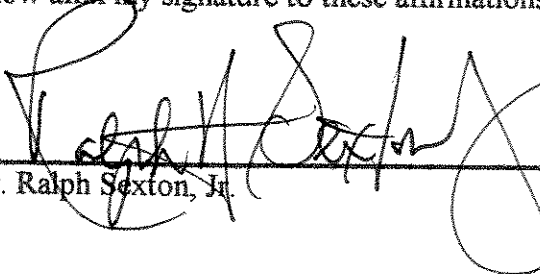
"...To Reach  
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### AFFIDAVIT OF COST

I, Dr. Ralph Sexton, Jr., founder of Ralph Sexton Ministries, by my signature affixed to this document, do hereby make the following statement of fact and affirm:

1. Total gross revenues of Ralph Sexton Ministries are \$127,924.53.
2. The cost for the broadcast per week, including airing and post production editing, is \$1650.00 (\$85,800 annually).
3. Captioning costs would be a minimum addition of \$700.00 per week for the broadcast and is not financially feasible.

I now affix my signature to these affirmations:

  
4-14-06  
\_\_\_\_\_  
Dr. Ralph Sexton, Jr.

Notary - Kimberly R. Bucke  
Exp - Sep. 26<sup>th</sup> 2006  
Date - April 14, 2006