

A Production of Victory Videos, Inc.

December 4, 2003

Confirmed

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DEC 18 2003
FCC - MAILROOM

CREATING A POSITIVE INFLUENCE THROUGH MEDIA
513.221.488

FCC, Office of the Secretary
Attn: Media Bureau
445 12th St. SW
Washington DC 20554

FEB 13 2004
Distribution Center

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JAN 21 2004
Distribution Center

To Whom It May Concern:

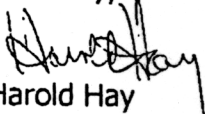
Victory Videos Ministries is requesting a petition from the FCC for an exemption from the closed caption requirements under the code of Fed Regulations Title 47 Section 79.1, Closed Captioning of Video Programming. Under the conditions set forth in Article 79.1(f) we believe this would create an undue burden upon the ministry and in fact, would be at this time financially impossible to overcome. From a logistics point of view, it would also create a major impact on our operations to produce programming due to the number of networks and individual television stations that carry our programming weekly.

Victory Videos Ministries has for the past 4 years produced and distributed a youth program called The Zone to Christian television networks such as Cornerstone and Daystar. The nature of the programming is both religious and educational. 70% of the material within the program is music videos, which in themselves are difficult to close caption.

Victory Videos Ministries is a 501©3 non-profit organization. Our annual budget is approximately \$300,000 and within this calendar year the organization is struggling to meet budget. We have been quoted a rate of \$300 per show to close caption The Zone. It would require increasing our budget to well over \$400,000, which is simply impossible at this time.

Our sources of support come from advertisers, underwriters, and individual contributors. It is our desire to find an underwriter to fund the cost of closed captioning as soon as possible, but this will require some time to do so. Section 1 of Article 79.1 requires video program distributors to provide 1,350 hours of closed captioning programming between Jan 1, 2004 and Jan 31, 2005. As a result, The Zone TV show will be forced off the air, unless we are granted an exemption from the requirements under Title 47, Section 79.1.

Please consider our petition so that we can continue to produce and distribute programs that create a positive impact in the lives of our youth.

Sincerely,

Harold Hay
Executive Director