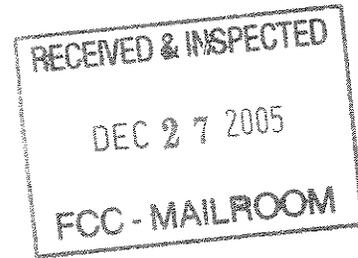


CeB-CC-0086

Petition for Exemption from Closed Captioning Requirements

Seth M. Freeman Jr.
Believers Tabernacle
2000 S. Hillside
Wichita, KS. 67211
(316) 684-4006
(316)684-4180 (fax)



Introduction

Believers Tabernacle is an affiliated member of the Assemblies of God, Springfield, Mo. and holds 501(c)(3) not-for-profit status with the state of Kansas and the Internal Revenue Service. Believers Tabernacle serves a congregation of in Wichita, Kansas. Believe TV is a daily 30 minute broadcast of Believers Tabernacle's worship services that airs on the WB network in the Wichita Metro area and throughout 84% of the state of Kansas. This broadcast has been in operation since February of 2004. Believers Tabernacle's broadcast is a non-news, non-repeating format that directly reaches the needs of thousands of viewers in the broadcast area. Believers Tabernacle hereby petitions for exemption from the closed captioning requirement under Section 79.1(d)(8).

Nature and cost of closed captions

Believers Tabernacle produces five (5) broadcast programs, totally 2 ½ hours of broadcast time per week at an airtime cost of \$60/30 minutes, totaling \$300/week. Production and editing are provided by Gerry Blaksley, an employee of Believers Tabernacle. The WB network currently does not offer closed captioning service to it's broadcasters. KWCH, channel 12 in Wichita offers transcribing and closed captioning at a rate of \$250 per 30 minutes...totaling an additional \$1250 per week, increasing production costs by more than 3 times. Allied Vaughn, a service in Wisconsin, charges \$730 per 30 minutes for roll-up captioning and \$842 per 30 minutes for pop-up captioning. Transcription for 30 minutes is \$375 additional. A search of the internet turned up a firm in Maryland called Closed Caption Maker, which charges \$10/minute plus \$50 plus \$2/minute for transcription, or a total of \$410 per 30 minutes (<http://www.ccmaker.com>). Software is available for closed captioning, but software costs range from \$2499 to nearly \$12,000 and the need to buy much faster computers to run this type of software. It will cost as much as \$15/hour to hire someone to transcribe broadcasts each week in addition to added editing and production time.

Impact on the operation of the program owner

The total cost for producing Believe TV was \$14,934.16. This program is furnished as a public service at the expense of Believers Tabernacle.

This program has proven effective of meeting the spiritual needs of hundreds of shut-ins and providing ministry to many who live in rural communities without ability to locate adequate houses of worship. Believers Tabernacle, being a non profit, does not use this broadcast to solicit sales...but it has been documented that at least 75% of all new visitors to Believers Tabernacle were influenced to visit by the daily broadcast. It is

conceivable, if not probable, that current growth in membership could suffer as a result of not being able to air this daily broadcast.

Other Relevant Factors

The requirement for closed captions has been a long time in the works, but since the primary business of Believers Tabernacle is not television production, they rely on the WB Network for notification of pending changes in FCC regulations. Believers Tabernacle first was informed of the 2006 requirements from another station who was attempting to sell them air time on their station. This information was shared on November 10, 2006. Believers Tabernacle then contacted the WB network and they indicated that they knew very little about the changes and would research it. The WB sent an email to Believers Tabernacle on December 13, 2005. Obviously, the time constraints are prohibitive to either raise more funds to cover the added burden of closed captioning; or to solicit any kind of sponsorship to help cover these added costs before new programs are completed and ready for broadcast in January of 2006, less than 2 weeks from the date of this petition.

Conclusion

While Believers Tabernacle appreciates the intent of giving greater programming access to the hearing impaired, the closed caption requirement will place an undue financial burden on Believers Tabernacle, making future programming impossible and thus depriving the American public by eliminating a unique and specialized broadcast. Believers Tabernacle therefore respectfully petitions for an exemption from the closed captioning requirement under Section 79.1(d)(8).

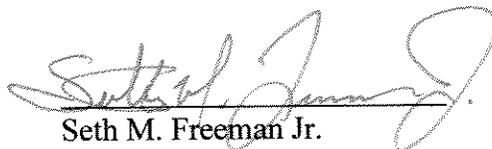
Closed Captioning Compliance Statement

Believers Tabernacle certifies to Station KWCV, community of license that the broadcast by the Station of our weekly church service is exempt from the closed captioning requirements of the Federal Communications Commission (47 CFR§ 79.1) under the § 79.1 (d)(8) exemption for “locally produced and distributed non-news programming with no repeat value” because the weekly church service program, which is co-produced in cooperation with the Station:

- is not news programming;
- is of special local interest to residents of the Station’s service area;
- is not repeated or redistributed; and
- is not scripted so that electronic new room closed captioning would be unavailable.

If there is any change in the above information, we will provide immediate written notice to the Station.

Believers Tabernacle


Seth M. Freeman Jr.

Dated: Dec 22, 2005

GENERAL AFFIDAVIT

State of Kansas
County of Sedgwick

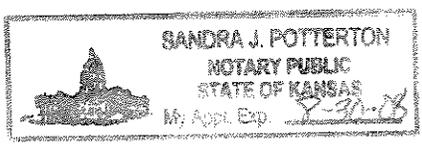
BEFORE ME the undersigned Notary,
Sandra J. Potterton, on this 22nd
day of December, 2005, personally appeared Seth M. Freeman Jr., known to me to be a
credible person and of lawful age, who being by me first duly sworn, on his oath, attests
to and affirms the above facts.

Seth M. Freeman Jr.
Seth M. Freeman Jr.
2219 Rio Vista
Wichita, KS 67204

Subscribed and sworn to before me, this 22nd day of December 2005.

Sandra J. Potterton
(signature of Notary)

Sandra J. Potterton
(typed name of Notary)



NOTARY PUBLIC

My commission expires: August, 30, 2008.

**Believers Tabernacle
Annual Report
January - December
2004**

Income		
General Funds		\$488,091.97
Covenant AG Church		\$12,117.27
Proceeds of Loan		<u>\$33,320.05</u>
		\$533,529.29
Gross Income		\$533,529.29
Expense		
Accounting		\$541.63
Advertising		\$1,790.89
Auto		\$9,577.44
Bank Charges		\$1,140.60
Bond Payment		\$277.50
Church Functions		\$8,304.36
Conferences		\$370.00
Dues & Memberships		\$318.64
Faith Kidz		\$3,500.62
Gifts		\$8,346.82
Guest Speaker		\$1,220.42
Insurance		\$15,926.22
Joy Fellowship		\$120.00
Junior Bible Quiz		\$545.21
Licenses & Permits		\$175.00
Master's Commission		\$4,556.00
Meal's & Entertainment		\$4,835.44
Media		\$14,934.16
Men's Ministry		\$559.62
Misc.		\$278.43
Missionettes		\$1,675.51
Missions-Benevolence		\$55,928.45
Mom's Day Out		\$831.15
Mortgage		\$49,492.36
Music Ministry		\$2,204.27
Nursery		\$818.43
Office Expense		\$20,971.11
Payroll Expense	\$159,600.87	
Covenant AG	\$12,617.27	
Payroll Expense Total		\$172,218.14
Petty Cash		\$401.50

Postage & Delivery		\$2,944.32
Property Expense		
Build/Improve Capitol Exp	\$46,975.79	
Decorating	\$416.11	
Furniture & Fixtures	\$5,356.70	
Janitorial Services	\$527.00	
Kitchen Supplies	\$116.00	
Grounds	\$2,340.63	
Pest Control	\$535.00	
Parsonage	\$376.02	
Permits	\$21.30	
Small Tools	\$442.95	
Supplies	\$8,755.69	
Taxes	\$49.19	
Wichita Dream Center (Annex)	\$16,725.40	
Property Expense Total		\$82,637.78
Promotional		\$1,537.30
Publications		\$3,231.27
Royal Rangers		\$696.91
Sunday School		\$1,631.62
Travel		\$4,074.04
Utilities		\$38,357.56
Women's Ministry		\$5,312.94
Youth		<u>\$4,208.06</u>
Total Expenses		\$526,491.72
Total Income		-\$533,529.29
		\$7,037.57
Balance in Checking		\$7,037.57
Balance in Savings		<u>\$68,248.14</u>
Total Net Revenue		\$75,285.71

**Believers Tabernacle
2000 So. Hillside
Wichita, Kansas 67211**

Financial Statement as of December 31, 2004

Current Assets	
General Checking	\$7,037.57
Savings	<u>\$68,248.14</u>
Total Current Assets	\$75,285.71
Fixed Assets	
Furnishings & Equipment	\$143,424.48
Building & Property	<u>\$750,000.00</u>
Total Fixed Assets	\$893,424.48
Total Assets	\$968,710.19
Long Term Liabilities	
Valley State Bank Loan (Refinance)	\$489,171.12
Bank of America (Truck Loan)	\$717.81
Bank of America (Van Loan)	<u>\$3,361.99</u>
Total Liabilities	\$493,250.92
Net Worth	<u><u>\$475,459.27</u></u>