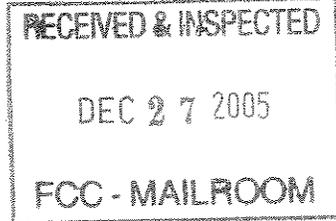


CGB-CC-00000  
90

## Springfield Community Church

Church office: 1101 J. W. Hunt Boulevard  
Panama City, Florida 32404  
Telephone (850) 785-4097



December 23, 2005

Office of Secretary  
Federal Communications Commission  
Attention: CGB Room 3-B431  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: REQUEST FOR EXEMPTION FROM COMMISSION'S  
CLOSED CAPTIONED RULES

To Whom It May Concern:

The Springfield Community Church respectfully submits this petition requesting exemptions from the closed captioning requirements under Section 79.1 of the Commission's rules, 47 C.F.R. and 79.1

The Springfield Community Church was founded in 1951 and is located in Springfield, Florida. The City has a population of 8,900 and is located in Northwest Florida. The City of Springfield is one of eight municipalities in Bay County. The mission of the Church is to serve the spiritual needs of the individual, the family and the community.

The Living Word of Faith Telecast, which began in 1962, is the longest running live broadcast in the United States. The program is produced by volunteers of the Springfield Community Church. The primary purpose of the telecast is to spread the gospel to persons unable to physically attend church, which includes shut-ins, the elderly, persons in the hospital and others. In addition to the message and songs, the program provides public service announcements for the community as a whole. The telecast assists the Church in its religious outreach mission.

Specifically, the telecast airs for one hour each Sunday at 8:00 a.m., and on only one television station. There are no repeat broadcasts. In addition to the production efforts of the volunteers, the Church also pays the television station for their production staff and equipment. The coverage area of the broadcast is described as the tri-state area, meaning Northwest Florida, South Alabama and South Georgia. The viewing audience has been estimated to be between 350,000 and 400,000 viewers.

For the reasons set forth below, the Springfield Community Church hereby requests an undue burden exemption from the closed captioning rules for the Living Word of Faith Telecast, pursuant to § 79.1 (f) of the Commission's rules.

1. The Springfield Community Church does not have closed captioning equipment, therefore it would have to pre-tape the programs and then send them to an outside source for captioning, then deliver them back to the station for broadcast. This would severely impact on meeting air time deadlines and eliminate the value of public service announcements. Currently, the cost per week paid to the television station for the telecast is \$612.00 for a total annual cost of \$31,840.00.

2. For closed captioning the television station has quoted the Church a price per Sunday telecast of between \$400.00 and \$600.00, effectively doubling the cost per week to an estimated annual cost of \$63,000. There appears to be no feasible alternatives for this type of programming.

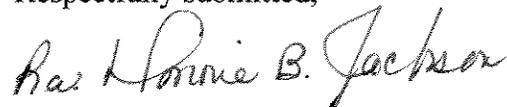
3. Springfield Community Church has very limited resources and is without the means to fund the doubling of any one expense. The reallocation of resources is not feasible because the largest expense categories are essential operational costs such as utilities and insurance. The attached quarterly financial statements attest to the fact that added cost would be an undue burden on the Church.

4. Without the exemption the Church would have to discontinue its outreach telecast.

The Church further believes that the local, non-news exemption to closed captioning rules also applies to the Living Word of Faith Telecast. As noted above, the program is produced and broadcast locally, and the sermons of the Springfield Community Church are of primarily local public interest. The telecasts are not news, they do not have repeat value and the electronic newsroom technique is not available. Notwithstanding the applicability of the exemption, we have filed this petition in an abundance of caution and for the purpose of establishing certainty.

As shown by this Petition and its attachments, the Commission should grant a waiver 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 have a significant impact on the Church's operations and mission. The Church's 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 close captions, a wavier under §79.1 (f) is warranted. If more information is needed, please contact me at the address provided below.

Respectfully submitted,



Rev. Donnie B. Jackson, Pastor  
Springfield Community Church  
1101 J.W. Hunt Boulevard  
Panama City, FL 32404  
(850) 785-4097

**DECLARATION**

**STATE OF FLORIDA  
COUNTY OF BAY**

I, Donnie B. Jackson, am the Pastor of the Springfield Community Church and I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of the Springfield Community Church in this matter, and upon information and belief, believe the statements regarding our organization and the Living Word of Faith Telecast to be true and accurate.

*Rev. Donnie B. Jackson*

Rev. Donnie B. Jackson, Pastor

*12/23/05*

Date

The foregoing instrument was acknowledged before me this 23 day of December, 2005, by Donnie B. Jackson, who is personally known to me or has produced his Florida Driver's License, Number \_\_\_\_\_, and who did take an oath.

**WITNESS** my hand and official seal in the County and State last aforesaid this 23 day of December, 2005.

*Christina Denise Craig*

Notary Signature

Printed Name \_\_\_\_\_

Notary Public, State of Florida at Large

Commission No.: \_\_\_\_\_

My Commission expires: \_\_\_\_\_



Christina Denise Craig  
MY COMMISSION # DD116357 EXPIRES  
May 12, 2006  
BONDED THRU TROY FAIR INSURANCE, INC.

**Springfield Community Church Quarterly Financial Summary**  
**January 1, 2005 thru March 31, 2005**

<b>Beginning Balance January 1, 2005</b>	\$	<b>59,503.09</b>
 <b>INCOME</b>		
Helping Hands Campground / Lynn Haven	\$	15,447.87
Interest Earned	\$	15.45
Rental / Office	\$	7,308.50
Telecast Sponsors	\$	3,910.00
Tithes & Offerings	\$	82,490.22
Sale of Bus	\$	2,000.00
<b>TOTAL INCOME:</b>	<b>\$</b>	<b>111,172.04</b>
Daycare Income Collected:	\$	27,045.06
Daycare Estimated EEC Accounts Receivable Due For March:	\$	7,308.00
<b>Total Daycare Income:</b>	<b>\$</b>	<b>34,353.06</b>
 <b>EXPENSES</b>		
Advertising	\$	2,186.10
Auto Expenses (Insurance, Fuel and Maintenance)	\$	2,816.44
Bank Charges (Checks & Deposit Books etc.)	\$	75.50
Cafeteria Expenses	\$	1,748.23
Church Supplies and Cleaning	\$	4,157.19
Decorating	\$	366.32
Flower Fund	\$	469.00
Helping Hand Expenses (Campgrounds and Lynn Haven)	\$	14,203.30
Insurance	\$	20,874.11
Ministerial Salaries	\$	7,400.00
Missions (The Needy, Mission Field, Prison Ministry)	\$	3,879.78
Office Expenses	\$	1,142.49
Payroll Expenses / Salaries	\$	12,813.36
Repairs & Maintenance (Includes Demolition of 3801 E. 6th Plaza & Part of Helping Hand)	\$	9,021.42
Retirement Funds	\$	10,267.12
Softball	\$	500.00
Special Occasions (Gifts, Birthdays etc.)	\$	1,470.86
Telecast	\$	5,200.00
Utilities (Electric, Gas, Water, Phone)	\$	16,230.51
<b>TOTAL EXPENSES:</b>	<b>\$</b>	<b>114,821.73</b>
<b>NET INCOME:</b>	<b>\$</b>	<b>(3,649.69)</b>
 <b>Ending Balance in General Fund Account:</b>	 <b>\$</b>	 <b>55,853.40</b>
 <i>**The Church paid an extra insurance premium of \$10,454.86 this quarter and a one-time payout of \$6,000.00 for the demolition of 3801 E. 6th Plaza and part of the Helping Hand Store on the Campgrounds.**</i>		
Daycare Expenses (Insurance, Salaries, Supplies, Utilities etc.)	\$	28,011.16
 <b>Springfield Community Church Account Balances As Of March 31, 2005</b>		
Building Fund Account	\$	317.28
Children's Ministry Account	\$	4,786.17
Church Account	\$	55,853.40
Daycare Account	\$	21,597.74
Money Market Account	\$	120,783.47
Museum Account	\$	638.77
 <b>OVERALL TOTAL:</b>	 <b>\$</b>	 <b><u>203,976.83</u></b>

**Springfield Community Church Quarterly Financial Summary**  
**April 1, 2005 thru June 30, 2005**

<b>Beginning Balance April 1, 2005</b>	\$	<b>55,853.40</b>
 <b><u>INCOME</u></b>		
Campmeeting	\$	3,648.80
Helping Hands Campground / Lynn Haven / Bailing	\$	19,388.37
Interest Earned	\$	11.12
Rental / Office	\$	4,775.00
Telecast Sponsors	\$	1,740.00
Tithes & Offerings	\$	82,990.35
Transfer from Money Market Account for purchase of Pastor's vehicle	\$	18,605.50
<b>TOTAL INCOME:</b>	<b>\$</b>	<b>131,159.14</b>
Daycare Income Collected:	\$	35,576.64
Daycare Estimated EEC Accounts Receivable Due For June:	\$	8,254.00
 <b><u>EXPENSES</u></b>		
Advertising	\$	1,977.83
Auto Expenses (Insurance, Fuel, Tags, Maintenance and Purchase of new car for Pastor)	\$	22,128.91
Bank Charges (Checks & Deposit Books etc.)	\$	108.95
Cafeteria Expenses	\$	4,429.55
Campmeeting Expenses	\$	3,949.43
Church Supplies and Cleaning	\$	2,501.38
Decorating	\$	866.85
Flower Fund	\$	595.00
Helping Hand Expenses (Campgrounds and Lynn Haven)	\$	14,876.68
Insurance	\$	6,582.80
Ministerial Salaries	\$	6,620.82
Missions (The Needy, Mission Field, Prison Ministry)	\$	2,657.09
Office Expenses	\$	899.34
Payroll Expenses / Salaries	\$	15,991.69
Repairs & Maintenance (Includes termite treatment \$2000.00 & A/C Unit \$6,800.00)	\$	14,244.61
Retirement Funds	\$	11,291.60
Softball	\$	110.00
Special Occasions (Homecoming and Special Events etc.)	\$	1,190.07
Telecast	\$	10,400.00
Utilities (Electric, Gas, Water, Phone)	\$	16,060.33
Miscellaneous Expense Purchase of Mobile Home	\$	500.00
<b>TOTAL EXPENSES:</b>	<b>\$</b>	<b>137,982.93</b>
<b>NET INCOME:</b>	<b>\$</b>	<b>(6,823.79)</b>
 <b>Ending Balance in General Fund Account:</b>	 <b>\$</b>	 <b>49,029.61</b>
Daycare Expenses (Insurance, Salaries, Supplies, Utilities etc.)	\$	42,064.91
 <b>Springfield Community Church Account Balances As Of June 30, 2005</b>		
Building Fund Account	\$	4,728.86
Children's Ministry Account	\$	5,104.11
Church Account	\$	49,029.61
Daycare Account	\$	20,399.45
Money Market Account (Transf. \$18,605.50 to Church Account for purchase of Pastor's Car)	\$	99,465.12
Museum Account	\$	765.02
 <b><u>OVERALL TOTAL:</u></b>	 <b>\$</b>	 <b><u>179,492.17</u></b>

**Springfield Community Church Quarterly Financial Summary  
July 1, 2005 thru September 30, 2005**

<b>Beginning Balance July 1, 2005</b>	\$	<b>49,029.61</b>
<b><u>INCOME</u></b>		
Helping Hands Campground / Lynn Haven / Bailing	\$	19,534.55
Hurricane Offering	\$	3,697.12
Interest Earned	\$	14.69
Rental / Office	\$	4,519.64
Telecast Sponsors	\$	1,860.00
Tithes & Offerings	\$	84,047.29
<b>TOTAL INCOME:</b>	<b>\$</b>	<b>113,673.29</b>
Daycare Income Collected:	\$	46,984.12
Daycare Estimated EEC Accounts Receivable Due For September:	\$	2,112.30
<b><u>EXPENSES</u></b>		
Advertising	\$	2,068.60
Auto Expenses (Insurance, Fuel and Maintenance)	\$	4,478.27
Bank Charges (Checks and Deposit Books etc.)	\$	44.00
Cafeteria Expenses	\$	832.17
Campmeeting Expenses	\$	305.20
Church Supplies and Cleaning	\$	2,574.19
Decorating	\$	186.22
Flower Fund	\$	219.00
Helping Hand Expenses (Campgrounds and Lynn Haven)	\$	16,229.86
Hurricane Katrina Donations (The remaining balance of donations will be reflected in next quarter's report)	\$	1,877.31
Insurance / Property Taxes / Licenses	\$	1,906.39
Ministerial Salaries	\$	7,119.35
Missions (The Needy, Mission Field, Prison Ministry)	\$	2,239.97
Office Expenses	\$	954.72
Payroll Expenses / Salaries	\$	17,560.54
Repairs & Maintenance	\$	10,015.59
Retirement Funds	\$	11,813.83
Special Occasions (Gifts and Special Events etc.)	\$	627.42
Telecast	\$	7,750.00
Utilities (Electric, Gas, Water, Phone)	\$	20,574.30
<b>TOTAL EXPENSES:</b>	<b>\$</b>	<b>109,376.93</b>
<b>NET INCOME:</b>	<b>\$</b>	<b>4,296.36</b>
<b>Ending Balance in General Fund Account:</b>	<b>\$</b>	<b>53,325.97</b>
Daycare Expenses (Insurance, Salaries, Supplies, Utilities etc.)	\$	50,496.26
<b>Springfield Community Church Account Balances As Of September 30, 2005</b>		
Building Fund Account	\$	4,377.01
Children's Ministry Account	\$	5,365.84
Church Account	\$	53,325.97
Daycare Account	\$	16,887.31
Money Market Account	\$	99,589.18
Museum Account	\$	786.32
<b><u>OVERALL TOTAL:</u></b>	<b>\$</b>	<b><u>180,331.63</u></b>

Springfield Community Church  
Balance Sheet  
As of December 21, 2005

	<u>Dec 21, 05</u>
<b>ASSETS</b>	
Current Assets	
Checking/Savings	
Peoples First - Building Fund	3,326.67
Peoples First - Daycare	12,473.18
Peoples First - Money Market	29,687.29
Peoples First - Museum	786.52
Peoples First Children Minis...	4,952.98
SunTrust - General Fund	37,513.03
Total Checking/Savings	<u>88,739.67</u>
Total Current Assets	<u>88,739.67</u>
<b>TOTAL ASSETS</b>	<u><u>88,739.67</u></u>
<b>LIABILITIES &amp; EQUITY</b>	