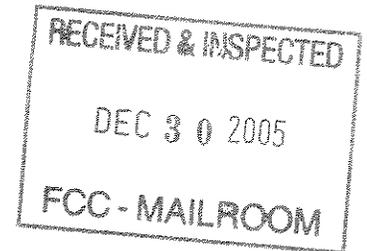


CGB-CC-0168

Office of the Secretary
Federal Communications Commission
Attention: COB Room 3-B431
445 12th Street SW
Washington, DC 20554



Petition for Exemption from Closed Captioning Requirements

Introduction

Word of God Ministries is a nationwide ministry based in Shreveport, Louisiana. The church is located at 5895 Bert Kouns Industrial Loop, Shreveport, LA 71138. Word of God Ministries was founded in September of 1994. James A. McMennis is the pastor. In addition to the television ministry in Shreveport, Pastor McMennis is also heard on radio in Dallas and Houston and travels to those cities to hold meetings. The church's mission is to minister the Word of God and saving knowledge of Jesus Christ. The church believes that Jesus is the manifested Word of God, God's only begotten Son, the Anointed One. Word of God Ministries is a Gospel Ministry that preaches the power of salvation: redemption, healing, deliverance, prosperity and victory by faith – through Jesus, the manifested Word!

Word of God Ministries' television program which airs on KSLA-TV 12 is titled "Ministering the Word." The television ministry helps the church achieve its goal by reaching people around the four state viewing area and enriching their spiritual lives. The ministry is young and rapidly growing and interested in continuing to grow in Louisiana and Texas and beyond. The program also serves shut-ins and members who may not be able to attend a particular service.

Each episode of "Ministering the Word" is thirty minutes long. The message is delivered and videotaped in a one hour sitting and then aired on two consecutive Sundays in half hour increments. The program airs every Sunday at 7 a.m. on KSLA-TV 12. It is videotaped in the sanctuary before a live congregation. Pastor McMennis provides a title to each message and then gives numerous chapters and verses of scripture throughout the message. The show has aired on KSLA-TV 12 since September 2005. Scott Crain, who owns a local production company, and has worked in the market for twenty plus years, shoots and edits the broadcast. He is hired by the church to produce a broadcast quality program. Word of God Ministries is a bible-based, multi-ethnic, Christ-centered ministry. It reaches millions through the avenues of television, radio, literature, audio tapes and assemblies. The church welcomes all and the broadcast is viewed by people from all walks of life. Demographics are young and old from various races.

For the reasons set forth below, Word of God Ministries hereby requests an undue burden exemption from the closed captioning rules for "Ministering The Word", pursuant to 7.1 (f) of the Commission's rules.

Nature and Cost of Closed Captions

“Ministering The Word” is time sensitive and must air in a timely manner. Preparing closed captioning would present a delay in post-production and getting the program to the station by the deadline of Thursday afternoon of each week for airing on Sunday morning. It will also present a burden of an overall production cost increase of 150%. See attached quote from Scott Crain Video Productions.

Impact on the Operation of the Program Provider

Such additional costs would make it quite difficult on the church. Word of God Ministries pays Scott Crain Video Productions \$600.00 per episode, which includes the videotaping, computer editing and delivery of tape to the station for airing each week. This comes to about \$31,200 per year. Having to pay for closed captioning services would increase the church’s production costs by 150 percent. Scriptural references are provided in large text at the bottom of the screen periodically throughout the program along with ministry information.

Financial Resources of the Program Provider

Word of God Ministries is a not for profit ministry and does have tax-exempt status. See attached financial budget of the church. The church’s source of income is the tithes and offerings of the congregation. The note on the building, the media ministry (including the television broadcast), as well as staff and utilities are among the major expenditures of the ministry. The church also maintains a website and produces a magazine which it gives out free of charge.

Type of Operations of the Program Provider

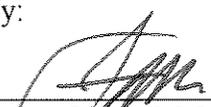
Word of God Ministries is mainly a non-profit religious institution. The church’s major activities are Sunday services which are held at 8 and 9:30 a.m. and 6 p.m. Mid-week Bible study is at 6:30 p.m. Wednesdays. Other major activities include the children’s ministry, teens’ ministry and the praise ministry.

Conclusion

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 costs of captioning would be excessively high and would have a significant impact on Petitioner’s operations. The Petitioner’s type of operations and financial resources are different in kind and magnitude from a mainstream programming provider. Because of the significant difficulty and expense of providing closed captions, a

waiver under 79.1 (f) is warranted. If more information is needed please contact me at the address provided below.

Respectfully submitted,
Word of God Ministries
By:



Pastor James McMennis
5895 Bert Kouns Industrial Loop
Shreveport, LA 71138
(318) 364-8977 Phone
(318) 364-8971 Fax

DECLARATION

I, James A. McMennis, am Pastor of Word of God Ministries in Shreveport, LA, and I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of Word of God Ministries in this matter, and, upon information and belief, believe the statements regarding our organization and "Ministering The Word" to be true and accurate.



James A. McMennis, Pastor

Date

12/28/05

Impact on the Operation of the Program Provider

The current cost to produce a Broadcast Quality Program for Word of God Ministries, Inc. is \$600 per 28.5 minute program. This price includes videotaping, computer editing and delivery of tape to the station for airing each week. This comes to about \$31,200 per year. Having to pay for closed captioning services could increase the church's production cost by over 150%. Besides the additional costs, closed captioning would seriously delay the production process by more than two weeks.

Currently, all Scripture References and Ministry information is provided at the bottom of the screen in a lower third throughout the television program.

Respectfully submitted,



Scott Crain
Scott Crain Video Production
1510 Fairfield Avenue
Shreveport, LA 71101
(318) 393-5830 Phone
(318) 220-0494 Fax

12-28-05

Date

Word of God Ministries
2005 Annual Budget

Item #	Income	BUDGET
101	General	\$430,000.00
102	Designated	\$36,000.00
103	Ministry	\$74,000.00
104	Product	\$24,000.00
105	Conference	\$12,000.00
106	Crusade	\$12,000.00
107	Missions	\$12,000.00
Total		\$600,000.00

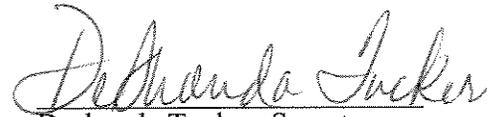
Item #	Expense	BUDGET	%
200	Transfers	\$12,000.00	2%
300	Bank Fees	\$2,400.00	0%
400	Benevolent	\$12,000.00	2%
500	Building	\$130,000.00	22%
600	Commercial Accts	\$36,000.00	6%
700	Conferences	\$9,600.00	2%
800	Insurance	\$12,000.00	2%
900	Internet	\$2,400.00	0%
1000	Loan	\$30,000.00	5%
1100	Maintenance	\$12,000.00	2%
1200	TV/Radio Broadcasts	\$130,000.00	22%
1300	Children/Youth	\$3,600.00	1%
1400	Media	\$3,600.00	1%
1500	Missions	\$12,000.00	2%
1600	Salary	\$99,600.00	17%
1700	Postage	\$4,800.00	1%
1800	Publications	\$12,000.00	2%
1900	Supplies	\$6,000.00	1%
2000	Telephone	\$7,200.00	1%
2100	Utilities	\$12,000.00	2%
		\$549,200.00	92%

Balance Remaining **\$50,800.00** 8%

Word of God Ministries, Inc.
 5895 Bert Kouns Ind. Loop
 Shreveport, LA 71129
 Office: (318) 364-8977
 Fax: (318) 364-8971

DECLARATION

I, Deshonda Tucker, am Secretary of Word of God Ministries, Inc. in Shreveport, LA. I have reviewed the enclosed Petition along with financial documentation and believe these statements are true and accurate.

A handwritten signature in cursive script that reads "Deshonda Tucker".

Deshonda Tucker, Secretary

12-28-05

Date