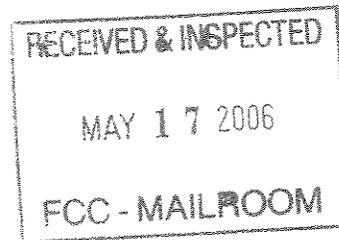
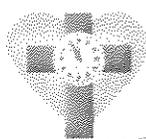




CGB-CC-0526
Channel of Love Ministries

Joan and Marty Pearce
PO Box 3007
Redding, CA 96099
530-357-4711
www.joanpearce.org



Now's the Time

For JESUS!

May 12, 2006

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

To Whom It May Concern:

Enclosed, please find our petition for Exemption to the Closed Captioning Requirements on the Basis of Undue Burden (79.1(f)) as well as attachments 1-5, Including Captioning Cost Quotes, Letter from our editor/programmer, Financial Statements and other Financial back-up.

We pray that you will take our petition into consideration and grant us exemption status.

Sincerely,

Reverend Joan L. Pearce
President/Owner of Channel of Love Ministries

The who wins court is wise Proverbs 11:30

**Petition for Exemption to the Closed Captioning Requirements
On the Basis of Undue Burden**

RECEIVED & INSPECTED

MAY 17 2006

FCC - MAILROOM

Introduction:

Now is the Time For Miracles is a weekly religious television program which is produced by Channel of Love Ministries International. It broadcast on Sky Angel weekly, airing on Monday at midnight. It primarily contains teaching and testimonies on issues of life. We have an 800 number that viewers can call in for prayer and to receive Jesus.

Nature and cost of closed captioning:

Adding closed captioning to our video shows would be a financial burden upon our small ministry.

To send out for captioning: We have looked into the cost of sending our tapes to a closed captioning service, enclosed are some prices from Custom Captions, Talking Type, and Computer Prompting and Captioning Co. (**Attached Price quotes, attachments 1, 2, and 3**) The least of these services would cost \$275.00 per show plus postage expenses from and back to our editing service for proofing and then to the TV station. In addition to the high expense, captioning would also create a delay in getting the program to the TV station in a timely manner as is required by Sky Angel, which is already difficult now.

To provide closed captioning in-house: This would not be an option for our ministry for several reasons. 1) My husband takes the camera's to where we are ministering and solicits volunteers to run the cameras 2) We do not have a facility of our own or any equipment other than the cameras 3) We send our tapes to FLTIM Production Studio where Diane Johnson edits and finishes the shows to completion 4) FLTIM Production Studio does not have the necessary equipment and can not afford the equipment for captioning. (**See attached Letter, attachment 4**) 5) To bring it in-house would require renting a facility, buying all the necessary equipment, and hiring someone who can edit and caption to be on staff at that facility. All of this would be out of our reach financially.

Impact on the operation of the program owner:

Now is the Time for Miracles production expenses are: Editing and Production \$150.00 per show, Shipping to editor and from editor to Sky Angel \$50.00 per show, Plus cost of tapes for camera and for Beta tapes for TV station \$30.00 a show. That is approximately \$230.00 per show (**refer to attachment 4**) To add closed captioning to the program would be an additional production fee of a minimum of \$275.00 plus an extra \$25.00 in shipping fees for an additional cost of \$300.00 per show. That would be an additional cost \$15,600.00 annually. Our production cost now are \$11,960.00 so to add closed captioning would more than double our production cost and be an obvious hardship on our small ministry and would force us off the air.

Financial Resources of the program owner:

Now is the Time for Miracles is not an income producing show. In fact Channel of Love Ministries International is supporting the show through outside donations from individuals and church offerings where we do ministering. Even our camera equipment was donated to us as a love gift years ago. All of our income comes from contributions from individuals. Attached are Channel of Love's 2005 financial reports. (**attachment 5 Pages 1-5**). We had a net income of \$2,333.04 for the year but actually we had a loss of \$23635.71 because the owner loaned money to the ministry in the amount of \$25,968.73 (see pg 3-4) which they got from sale of personal real estate and belongings. It is not something it can repeatedly do. As you can see the owner takes only a very small salary. Also, it shows television expenses as \$14,576.58 but nearly all of our UPS expenses under postage are for TV related production expenses as well. (See pg 5)

The type of operations of the program owner:

Channel of Love Ministries International has many types of ministries, all with a goal of reaching the less fortunate, helping people with food and clothes, and assisting people who are hurting in their daily lives, where we bring them hope and encouragement and share with them the love of Jesus. One of our ministries is providing Tent Meetings, Outreaches, and Missionary work, where we preach Jesus and give out food, clothing and toys etc. Another ministry is our TV program "Now is the Time for Miracles" where we share issues of life and teach the gospel of Jesus. The purpose of the program is to save souls and to provide a crises/prayer line via an 800 number, where viewers can call in for prayer and receive free literature. We minister in churches, prisons, shut-ins, nursing homes and senior citizen facilities. We also teach and train people to go on Mission Trips and take small groups into the mission fields so they can be used of God.

Other relevant factors:

According to **(47 C.F.R. § 79.1 (d) 11) Captioning expenses is excess of 2% of gross revenues.** No video programming provider shall be required to expend any money to caption any video programming if such expenditure would exceed 2% of the gross revenues received from that channel during the previous calendar year. Our gross revenue was \$127,878.28, 2% of that is \$2558.00. At an additional cost of \$300 per show, 4 times a month, it would take just over two months to reach that amount.

We have phone lines with about 18 volunteers to answer calls from the TV show. We greatly desire to remain on the air because of the number of people we are having an impact on. Our desire is so great that we are willing to financially help support the Television Ministry even at our own expense whenever possible.

Conclusion

At this time the air time is given to us free by Sky Angel, but the production and support cost associated with the Television Ministry are extremely expensive for our budget and to add closed captioning at this time would cause an undue burden and force us to go off the air. Please consider our request to be granted exemption to the closed captioning of our show "Now is the Time for Miracles."

Home

Attachment 1

Rates

How Much Will It Cost

For creating the captions, we have an unbelievable rate of...

Roll-Up: \$3.00 per Minute**Pop-Up: \$4.00 per Minute**

Sample rates for shows:

Duration 30 minutes for Roll-Up captioning:**Roll-Up**

Transcription	\$ 60.00
Cost of creating a captioning file (bulk of the work)	\$ 90.00
Encoding	\$125.00
Total:	\$275.00

Pop-On

Transcription	\$ 60.00
30 minutes of pop-on captioning @\$4.00 per minute	\$120.00
Encoding	\$125.00
Total:	\$305.00

If you are set up for encoding yourself then we will only charge you the cost of creating the caption file.

Important:

With closed captioning, time is of the essence. We encourage you to involve us with the project in the early stages of production. When you reach your fine cut, please send us a vhs copy with a VITC or an LTC time code. We'd like to get started on the close caption right away. Nevermind the changes that will happen between the fine cut and the master. We'll incorporate those to the closed captions without any extra cost as long as you let us know what and where they are (unless you completely overhaul the program in a major way). Our costs with captioning are heavily dependent on the turn-around time.

← Transcription
and Video Description
rates

Subtitling
rates →



- Home
- Captioning
- Teleprompting
- Subtitling
- DVD
- Webtv
- V-Chip
- Webcasting
- Realtime Live
- Video On Demand
- Realtime Live
- Post-Production
- Audio Description
- DVD
- Webcast Services
- Realtime Live
- Video-On-Demand

Post Production Captioning/Subtitling

Attachment 2

[Click here for the Order Form](#)

Satisfaction Guarantee

CPC provides a free approval copy to guarantee satisfaction.

Quality

Top quality captioning is our highest priority. It is achieved by:

- State-of-the-art software
- Experienced, highly trained captioners
- Teamwork of captioners & software developers
- 15 years of experience
- Triple quality control

Video Media

- **Videotape:** All formats from VHS to Digital Betacam
- **DVD:** Caption and subtitle files for most major DVD authoring systems
- **Webcast:** Video-on-Demand

Specials

- Major discounts for bulk work
- Extreme discounts to caption Webcasts of previously captioned videos.

Transcription & Translation

Professional Transcription and translation to most major languages available at competitive price.

Languages

Closed & Open Captioning

English, Spanish, French, Portuguese, Dutch, German and Italian

Subtitling

English, plus all Eastern and Western European languages. Unlimited language

Caption/Subtitle Rates Made Simple

Pop-on mode: \$7/min. of video
+ \$150 setup fee

Roll-up mode: \$5/min. of video
+ \$150 setup fee

(You provide transcript & blank tape)

.....
Add \$3/min. of video if CPC transcribes.

Special Bulk Rate for VHS Tapes - \$6.00/Minute

For any VHS job over 5 hours, CPC has a great price of \$6.00/min. of video. You provide the video, we transcribe and caption it in the Roll-up mode.

Retrieve/Convert Captions Between Different Formats

- Webcasting with Captions
- DVD Captioning/Subtitling

[Click here for rates and details of all file formats supported](#)

Sample Video w/ Captions

Sample Video captioned for the Web
DSL/Cable users: [Click here](#);
56K users: [Click here](#)

Faith Life Tabernacle



Pastor Barbara Reis
Post Office Box 25568 • Richmond, Virginia 23260

Attachment 4

May 13, 2006

To Whom It May Concern:

I, Diane Johnson, edit and produce Channel of Love Ministries television show "Now is the Time for Miracles." All work is done at FLTIM Production Studio, which is located at Faith Life Tabernacle International Ministries in Richmond, VA on a voluntary base. We currently use the Velocity Non Linear System.

We looked into the cost of adding closed caption equipment to our system and found it to be too costly at this time as well as having insufficient staffing to run it.

FLTIM Production Studio currently receives \$150.00 per show from Channel of Love Ministries. Channel of Love provides their own tapes and pays for the shipping of all programs.

The station, Sky Angel, who airs "Now is the Time for Miracles" requires the produced tape to be at their station no later than 10 days before the show is to air, which I am hardly able to make because of my part time availability. Because of Sky Angel's deadline it is very time consuming to edit and send the program to a closed caption company. The time it takes to receive the program back to proof it would cause Channel of Love Ministries to miss their airing deadline.

Sincerely,

Diane Johnson

Go ye into all the world and preach the gospel.

Channel of Love Ministries International
Profit & Loss
January through December 2005

Attachment 5
Pg 1

	Jan - Dec 05
Ordinary Income/Expense	
Income	
Contributions	127,843.86
Interest	34.42
Total Income	127,878.28
Total Income	127,878.28
Expense	
Advertisement	812.50
Airline	4,003.99
Automobile Expense	11,980.67
Bank Service Charges	426.52
Books	429.82
Credit Protect	100.71
Dining	4,729.12
Dues and Subscriptions	45.00
Equipment	3,595.50
Gifts Given (Contributions)	15,471.39
Insurance	
Auto	2,110.67
Health	6,124.00
Liability Insurance	808.00
Total Insurance	9,042.67
Interest Expense	
Finance Charge	2,937.09
Interest Expense - Other	47.40
Total Interest Expense	2,984.49
Internet service	2,162.45
Licenses and Permits	50.00
Medical	880.97
Miscellaneous	-107.50
Mission	
Clothes	100.00
Lodging	300.00
Mission - Other	500.00
Total Mission	900.00
Office Supplies	5,075.25
Outreach	
books	0.00
clothes, etc.	0.00
food	475.49
toys	0.00
Outreach - Other	800.00
Total Outreach	1,275.49
Outside Labor	1,525.00
Postage and Delivery	\$ 7,210.75
Printing and Reproduction	2,475.30
Professional Fees	
Accounting	580.00
Total Professional Fees	580.00
Rent	3,100.00
Repairs	
Computer Repairs	354.40
Equipment Repairs	70.00
Total Repairs	424.40
Salary	9,100.00
Supplies	1,411.34
Taxes	2,013.55

MOST OF THIS IS
FOR TV

9:57 PM

05/11/06

Accrual Basis

Channel of Love Ministries International
Profit & Loss
January through December 2005

Attachment 5

Pg 2

	Jan - Dec 05
Telephone	
Prayer Line	1,853.49
Telephone - Other	4,833.95
Total Telephone	<u>6,687.44</u>
Television	
Crises Line Phones	2,207.91
Postage	416.63
Television - Other	11,952.04
Total Television	<u>14,576.58</u>
Tent	
Auto	1,458.64
Clothes	0.00
Food	1,980.89
Gifts	126.11
Lodging	192.13
Misc	203.04
Travel	137.66
Tent - Other	1,961.21
Total Tent	<u>6,059.68</u>
Travel & Ent	
Entertainment	147.93
lodging	2,340.89
Travel	1,133.38
Travel & Ent - Other	6.53
Total Travel & Ent	<u>3,628.73</u>
Utilities	
Firewood	453.30
Gas and Electric	887.98
Sewer	141.19
Water	413.51
Total Utilities	<u>1,895.98</u>
Total Expense	<u>124,547.79</u>
Net Ordinary Income	3,330.49
Other Income/Expense	
Other Expense	
Other Expenses	997.45
Void	0.00
Total Other Expense	<u>997.45</u>
Net Other Income	<u>-997.45</u>
Net Income	<u><u>2,333.04</u></u>

12:07 PM

05/12/06

Accrual Basis

Channel of Love Ministries International

Account QuickReport

As of December 31, 2005

Attachment 5

Pg 3

Balance

13,429.24
 12,929.24
 12,729.24
 12,129.24
 12,129.24
 13,910.20
 14,289.66
 14,589.70
 14,089.70
 13,589.70
 14,962.89
 14,762.89
 15,496.84
 15,641.13
 15,491.13
 14,991.13
 14,491.13
 13,491.13
 13,691.13
 15,570.45
 15,070.45
 14,770.45
 15,211.85
 15,211.85
 13,711.85
 12,911.85
 13,111.85
 14,315.44
 13,315.44
 12,315.44
 12,790.44
 13,872.54
 13,372.54
 12,972.54
 14,518.76
 13,718.76
 13,891.37
 13,191.37
 -2,783.63
 7,216.37
 13,727.50
 21,524.05
 20,824.05
 21,324.05
 22,877.19
 23,492.07
 23,192.07
 22,692.07
 24,571.23
 25,039.05
 24,539.05
 25,039.05
 24,539.05
 29,746.19
 29,985.61
 30,666.30
 31,266.30
 30,766.30
 36,066.30
 36,766.30
 36,266.30
 36,466.30
 35,766.30
 38,329.73
 38,829.73
 39,129.73
 39,329.73
 39,105.96

↓
beg. loan to
owner

Attachment 5

12:07 PM

05/12/06

Accrual Basis

Channel of Love Ministries International
Account QuickReport
As of December 31, 2005

pg 4

Balance
39,483.19
40,401.45
36,901.45
36,950.15
37,573.30
37,873.30
38,004.70
38,023.70
38,602.54
39,221.76
39,397.97
<u>39,397.97</u>
<u>39,397.97</u>

ending
loan to owner

difference of \$25,968.73

12:20 PM
05/12/06
Accrual Basis

Channel of Love Ministries International
Expenses by Vendor Summary
January 1 through May 12, 2006

pg 5
Attachment 5

	<u>Jan 1 - May 12, 06</u>
AT&T	832.08
Bank of America - Visa	7,593.87
Barbara Reis	2,420.00
Bethel Bible College	550.00
Bill Ballinger	464.12
Campana Propane Service	222.42
Carrie Lemricks	12.00
Charles B Merrill Office Equip & Supplies	648.26
Chase Card Services	378.87
Citi-Card	613.32
Clear Creek Community Services District	151.07
Copy Right Printing	1,348.26
Costco	45.00
Cruz Reynero	95.00
Dianna Johnson	400.00
Discover	10.00
Dish Network	177.96
Dominion Foundation	200.00
Donna Woods	61.85
Durst Properties	1,750.00
Farmers Insurance	1,047.20
FreshFires International	275.00
Gospel Crusade	80.00
House of Refuge	-950.00
International Fellowship of Christian & J	150.00
Issues of Life Ministries	325.00
Joan Pearce-V	739.29
Kaiser Permanente	1,560.00
Lea Anna Bacon	144.38
Lifesat TV	300.00
Lori J Scott Treasurer Tax Collector	764.81
Mariana La Luz	250.00
Mary Jo-Kaiser	195.66
Merchant Account	70.00
N.T.C. Ministries	352.00
Nancy Widdifield	1,497.46
Pamela Thomas	350.00
PG&E	124.67
Postmaster	518.94
Qwest	655.25
Ray Rodriguez	190.00
Schembri Vision	1,000.00
Secretary of State	10.00
Sky Angel	149.90
TBN	200.00
TDS Telecom	249.77
Teresa Harris	100.00
Unknown	-1,167.00
UPS	1,546.80
Verizon Wireless	777.34
Waste Management of Anderson Cottonwood D	127.14
Windy Inman	120.00
Wings of Faith Missions	500.00
TOTAL	<u>30,227.69</u>

GENERAL AFFIDAVIT

State of California

County of Amador

Before me, the undersigned Notary, Lu Ella Fulton

on this 15th day of May, 2006, personally appeared Joan L Pearce, known to me to be a credible person and of lawful age, who being by me first duly sworn/affirm, on affirming her oath, deposes and says:

I, Joan L. Pearce do affirm that the information contained in this **Petition for Exemption to the Closed Captioning Requirements on the Basis of Undue Burden** to be true and accurate to the best of my knowledge.

Joan L Pearce

Joan L. Pearce
P.O. Box 3007
Redding, CA 96099
Phone: 530-357-4711
Cell: 530-515-5044
e-mail: revjpearce@aol.com

Subscribed and sworn/affirm to before me, this 15 day of May, 2006.

Proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Luella Fulton

