

KTXL-DT
Sacramento, California
Post-Transition STA Request
May 2009

Exhibit 21

Post-Transition STA Request

Channel 40, Inc, permittee of KTXL-DT, Sacramento, California (“KTXL”), hereby requests special temporary authority to operate its post-transition, digital facility at 55 percent of authorized power for six months to enable it to complete the replacement of its analog channel 40 RF system with a new digital system. The technical details of the proposed operation are set forth in the engineering materials submitted with this application. As demonstrated below, KTXL qualifies for a post-transition STA as a station facing a unique technical challenge within the meaning of the *Third DTV Periodic Report & Order*.

KTXL is the Sacramento Fox affiliate and is currently operating on analog channel 40 and digital channel 55. Because its pre-transition digital channel is outside the core, KTXL had no choice but to return to its analog channel for post-transition digital operations. However, KTXL was/is unable to build-out its full-power, post-transition digital facility until after June 12 because it cannot discontinue analog operations and disrupt the viewing patterns of thousands of Fox programming fans.

In the instant STA request, KTXL proposes to operate its post-transition digital facility at an ERP of 550 kW, which represents 55 percent of its authorized power. *See* FCC File No. BPCDT-20080320ABI. The technical statement filed with this STA request confirms that KTXL’s proposed digital operation at 55 percent power is predicted to serve more than 100 percent of KTXL’s analog service population. *See* Technical Statement at 2 (nearly 170,000 more viewers served by proposed digital STA operation than licensed analog operation).

Following June 12, KTXL will remove the old channel 40 analog RF system and install a complete new channel 40 digital RF system. It will also have to move a control cabinet from the old channel 55 digital transmitter and wire it in to the channel 40 transmitter and then re-route the transmission line inside its transmitter building. On top of all this, KTXL will also have to convert the remaining part of its analog transmitter to operate in digital. Although KTXL expects to complete this work by end of summer, it has request a six month STA out of an abundance of caution.

For all these reasons, KTXL submits that it qualifies as a station facing a “unique technical challenge” and that the instant STA request should be granted.