

Exhibit 38

Request for STA

Applicant Vermont ETV, Inc. (“Vermont ETV”), licensee of WVTB-TV, NTSC Channel 20, and WVTB-DT, DTV Channel 18, both St. Johnsbury, VT (“the Station”), respectfully requests Special Temporary Authority (“STA”) to operate WVTB-DT with facilities at variance from those authorized by the Station’s license (File Number BLEDT-20060703ABN). Grant of the requested relief will not result in expansion of the Station’s digital service contour and therefore would be consistent with the Commission’s pending “freeze” concerning expansion of service area.¹

Vermont ETV is filing this application in order to address a discrepancy between the authorized and as-built effective radiated power (“ERP”) for WVTB-DT. While the Station license specifies a digital power level of 75 kW ERP, WVTB-DT is presently operating at 67 kW ERP, and it has determined that based on the current status of its equipment, it will be necessary to operate at that power level going forward. Concurrently herewith, Vermont ETV is filing an application for a construction permit for minor modification of WVTB-DT’s technical parameters to conform to the facilities as constructed.

¹ Public Notice, “Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes,” DA 04-2446 (rel. August 3, 2004).