

WBMA-LP
Birmingham, AL
STA Request
December 2009

Exhibit 39

Explanation Regarding Request for Extension of Reduced Power STA Request

TV Alabama, Inc., licensee of analog low power station WBMA-LP, Birmingham, Alabama, hereby requests an extension of its low power special temporary authority (“STA”) to operate WBMA-LP at 13 percent of authorized power for six months. A tube in WBMA-LP’s analog transmitter failed several months, forcing TV Alabama to operate WBMA-LP at reduced-power. The technical details of WBMA-LP’s operation were specified in its initial application for a reduced-power STA.

An extension of time is necessary since the decision to incur additional expenses either to repair the analog transmitter for WBMA-LP or flash cut it to digital service is integrally related to a potential power increase and antenna move for the full power station that simulcasts the LP programming. WBMA-LP and the full power WJSU-TV simulcast the same programming. TV Alabama, Inc., which is also the licensee of WJSU-TV, is in the process of reviewing its options including a move of WJSU’s side-mounted Channel 9 antenna to a top mount position and increasing the station's power. The decision became more complex because WBIQ, the public broadcasting station in the Birmingham market, recently applied to vacate adjacent channel 10, potentially permitting an increase in power for WJSU. Depending on coverage and costs, TV Alabama may: 1) flash cut the low power facility of WBMA-LP to fill in coverage gaps in central Birmingham, 2) move the WJSU antenna to the top mount position and increase its power or 3) both. Since the application to move WBIQ off channel 10 was recently filed, TV Alabama has commissioned an engineering study to determine whether a power increase is feasible and

what effect a WJSU power increase on Channel 9 will have on actual coverage in the market. Depending on the results of that study, the station will determine how to proceed on both the WJSU and WBMA stations. As a result, additional time is necessary to continue to operate WBMA-LP on a lower power analog basis until the results of the engineering study and related equipment costing issues are resolved.

During the sixth months of the reduced-power STA, TV Alabama will evaluate its options to either the repair the analog transmitter or modify/replace the analog transmitter with a digital transmitter.