

ATTACHMENT TO EXHIBIT 21

Rural California Broadcasting Corporation (*RCBC*), the licensee of both TV Translator Station K35DO (the *Translator*) and its primary station, Non-Commercial Educational Station KRCB, Channel 23, Cotati, California, FCC Facility ID No. 57945, hereby requests an Engineering STA to operate the Translator at variance from its licensed parameters.

The Translator is licensed to operate in the NTSC signal mode, and to generate 129 Watts of horizontally polarized Effective Radiated Power from a transmitter site having the NAD 1927 coordinates:

North Latitude 38° 55' 39"; West Longitude 123° 06' 50".

The licensed antenna is a Scala Model No. ODD940404IA directional array, FCC Antenna ID No. 22191. See FCC File No. BLTT-19940509JJ.

By means of this request, RCBC seeks authority from the Commission to operate the Translator with its licensed ERP, HAAT, and antenna, but in the ATSC Digital mode rather than in the NTSC analog mode. Operation in the Digital mode is the only variation from the licensed parameters that this STA request proposes. This authority has been previously conveyed to RCBC by the Commission's grant of RCBC's request, FCC File No. BSTA 20100312 ADB, and as extended by the Commission's grant of RCBC's extension request, BESTA-20100910ABY.

On March 15, 2011, RCBC sought to extend its outstanding STA, but could not do so due to an apparent limitation within CDBS or some quirk related to the Commission's Engineering Data Base. Thus this request for an engineering STA is filed to, in effect, request extension of that previous STA, or viewed another way, a replacement or successor STA.

The circumstances that prompt this request are extraordinary and fully warrant a grant of temporary authority to operate at variance to the Commission's rules.

As RCBC has previously reported to the Commission in RCBC's Dark-Authority Request, FCC File No. BLSTA-20100722HWW, the Translator is currently dark. That is because the transmitter site owner had raised concerns about the risk of fire danger that would be posed by keeping continuously energized during the fire season the transmission line that feeds utility power to the wooded transmitter site. Fire season is now over, and the site owner is willing to allow RCBC to reenergize the utility-power transmission line. RCBC therefore seeks this STA to enable RCBC to resume operation of the translator in the ATSC Digital mode, but otherwise in accordance with licensed parameters.

RCBC has obtained authority to permanently relocate the Translator and to convert it to a Digital facility.¹ In light of the migration of over-the-air television viewers to the Digital mode, temporarily authorizing RCBC to operate in Digital at the licensed site would better serve the public interest.

The grant of this STA request will further the public interest. The grant will enable RCBC to:

1. resume providing Non-Commercial Educational television service to the Translator's rural service area, which, due to terrain shielding, receives limited television service from over-the-air sources;
2. furnish improved-quality signals to the viewing public, due to the inherent, superior nature of Digital transmissions; and
3. provide three audio visual streams to the members of the public served by K35DO, thereby providing that population with a greater selection of public-television programming.

¹ See FCC File No. BDFCDTT-20090824AJS.