

**KPIX-TV
San Francisco, California
STA Request
Exhibit 21**

CIRCUMSTANCES WARRANTING STA

CBS Broadcasting, Inc. ("CBS"), licensee of KPIX-TV, analog Channel 5 and digital Channel 29, San Francisco, California, requests special temporary authority ("STA") to initially operate with reduced facilities following the digital transition.

KPIX-DT is currently operating with licensed facilities from a side-mounted antenna on the multi-user Sutro Tower in San Francisco, at a height above average terrain (HAAT) of 401 meters with fully-authorized power of 1,000 kW. KPIX-TV holds an authorization (BMPCDT-20080603AAG) to construct its final post-transition facilities on Channel 29, which will operate at the same power from a top-mounted antenna at 512 meters HAAT.

Before new DTV antennas can be installed for KPIX-TV and other Sutro Tower stations at the top of the tower, the analog antennas of eleven stations must be removed from the candelabra platform of the tower structure. This work cannot begin until February 18, 2009, in light of the necessity of maintaining analog service until the final transition. Therefore, it will not be possible for KPIX-TV to complete construction of its full authorized facilities by February 17, 2009, due to "unique technical challenges," as defined by the Commission's *Third DTV Periodic Report and Order*.

Accordingly, CBS seeks an STA authorizing KPIX-TV to operate with less than its full authorized facilities following the transition date. During this period, KPIX will operate from its licensed, transitional digital facilities whenever tower work is not in progress, which we anticipate will be at least 12 hours per day, including all prime time hours. This interim operation will serve the entire population in the areas now commonly served by the station's analog and digital signals.

During daylight hours when tower work is being done, it will be necessary to operate from an auxiliary digital antenna at a lower tower location, in order to ensure that tower workers are not exposed to RF radiation in excess of applicable limits. An application for authorization of an auxiliary antenna at the site, to operate at 500 kW ERP (directional) and an antenna HAAT of 412 meters, is being filed simultaneously herewith. As shown in the attached Engineering Statement, KPIX's STA operation from the auxiliary antenna will actually serve a slightly larger population than the station's licensed transitional digital facility, since incoming interference levels will be changed with the elimination of nearby analog stations. The auxiliary operation would thus provide a greater than 100 percent population match of the licensed analog and digital KPIX-TV/DT facilities' common service population.

CBS presently anticipates that KPIX's full authorized digital facilities will be operational by October 18, 2009. However, because the *Third DTV Periodic Report and Order* specifies August 18, 2009 as the end of the maximum initial period for post-transition operation pursuant to a "phased implementation" STA, CBS respectfully request that the authority sought hereby extend to that date.