

KATV, LLC  
KATV-DT, Little Rock, Arkansas  
December 2007

**EXHIBIT 36**

**EXPLANATION OF REQUEST TO EXTEND SPECIAL TEMPORARY AUTHORITY**

KATV, LLC (“KATV”), licensee of KATV(TV), NTSC Channel 7/DTV Channel 22, Little Rock, Arkansas, hereby requests an extension of its special temporary authority (“STA”) to continue operating KATV-DT with a slightly smaller service area than its certified, maximized digital construction permit. As discussed more fully below, KATV will be unable to achieve a 100 percent coverage match with its certified facilities until after the transition ends when it can remove its top-mounted analog antenna and replace it with its digital antenna. Until then, KATV is providing substantial service to the market. KATV’s current DTV STA operation provides service to approximately 97.5 percent of the population predicted to receive service from KATV’s certified DTV facilities.

KATV-DT is operating with an ERP of 750 kW and a HAAT of 514 meters pursuant to STA. *See* FCC File No. BDSTA-20060817ADZ. KATV certified that its post-transition DTV operations would match the service area of its maximized DTV construction permit that authorizes an ERP of 750 kW with an HAAT of 574 meters. *See* FCC File No. BPCDT-19991027ABF. The minor coverage difference (approximately 2.5 percent) between KATV’s DTV STA and its certified DTV facility results from the side-mounted installation of the STA antenna compared to the top-mounted antenna in the certified DTV facility, resulting in an HAAT decrease of approximately 60 meters. Although the DTV STA facility serves approximately 30,000 fewer people than KATV’s certified DTV construction permit, the STA facility serves approximately 6,000 more people than KATV’s analog channel 7 licensed facility.

An extension of DTV STA is needed because KATV's DTV antenna must remain side-mounted until the DTV transition ends and the analog antenna of KATV (channel 7) is removed from the top of KATV's tower. Any attempt to remove KATV's top-mounted, 36,000 pound, analog antenna before February 17, 2009 would inevitably cause a significant loss of analog service. In addition, the channel 2 analog antenna of KETS, which is mounted immediately below the KATV analog antenna, will only be removed after analog broadcasting ceases.

KATV submits that its request for an extension of its DTV STA is decidedly in the public interest and should be granted. The DTV STA operation provides service to 97.5 percent of the population predicted to receive service from KATV's certified DTV facilities and approximately 6,000 more people than KATV's licensed channel 7 operation. The DTV service from the STA facility provides ABC digital programming, including the many hours of HD programming the network now provides, to virtually all of the Little Rock market without seriously disrupting long-established analog viewing patterns.