

## EXHIBIT 21

### **Request for Approval of Early Commencement of Maximized Post-Transition DTV Operation**

NCE Station WNEO-DT, Alliance, Ohio  
Facility ID: 49439 / FRN: 0002940336

Northeastern Educational Television of Ohio, Inc. (“NETO”) respectfully requests approval for early operation of its maximized post-transition digital television service for noncommercial educational Station WNEO-DT, DTV Channel 45, Alliance, Ohio, as authorized by FCC File No. BMPEDT-20080619AIA. A special operating condition in that maximization construction permit specifies that NETO cannot commence operation pursuant to the permit before February 17, 2009 without prior Commission approval. Accordingly, NETO seeks Special Temporary Authority (“STA”) to begin its maximized DTV Channel 45 operation as soon as possible, in order to remedy reception problems encountered by local over-the-air viewers following the station’s recent implementation of an early DTV transition.

**Background.** NETO operated Station WNEO on analog Channel 45 and pre-transition digital Channel 46. NETO elected to return to Channel 45 for post-transition operations and received a construction permit authorizing 44 kW ERP (*see* FCC File No. BPEDT-20080317AGT). To facilitate its DTV transition, NETO sought STA to commence early operation on post-transition DTV Channel 45, pursuant to that granted (non-maximization) construction permit. The Commission granted that STA in FCC File No. BLDSTA-20080905AAO. Accordingly, WNEO ceased analog and pre-transition digital broadcasts on November 19, 2008, and commenced DTV Channel 45 operation on November 21, 2008. On December 5, 2008, the Commission granted WNEO-DT’s “maximized” construction permit application for operation of its post-transition facility at 500 kW ERP.

**Transition Related Viewer Reception Difficulties.** Since November 19, 2008, when WNEO ceased analog and pre-transition digital broadcasts, WNEO’s call center has received roughly 150 calls from over-the-air viewers reporting reception problems. The station’s call center staff attempted to determine the number of reception problems that were caused by viewer errors, and found there were very few, if any. NETO believes that the majority of viewers who have contacted the call center cannot receive the WNEO-DT signal because of the signal strength of the post-transition 44 kW facility. In addition, the station has received several dozen e-mails from viewers who also reported similar reception issues. Attachment A to this exhibit summarizes the complaints, and identifies the geographic areas where viewers are experiencing reception problems.

**Request for STA.** NETO believes that implementation of its authorized power increase prior to the transition date will immediately alleviate viewers’ reported problems. Operation at 500 kW, the level authorized in its maximization permit, will significantly enhance WNEO-DT’s signal strength and dramatically improve viewer reception. Moreover, based on its consulting engineer’s studies, NETO believes that operation of WNEO’s maximized DTV facility in FCC File No. BMPEDT-20080619AIA prior to February 17, 2009 will not cause impermissible interference to any other station. Please see the attached engineering exhibit.

Early commencement of operation under the granted minor change maximization permit will serve the public interest by restoring service, and WNEO-DT's noncommercial educational programming, to its community of license, thereby meeting viewer's expectations regarding the digital transition and continued service from existing stations.

NETO is a noncommercial educational licensee and it operates WNEO-DT on a noncommercial educational basis. The licensee is therefore exempt from FCC filing fee requirements, pursuant to Section 1.1114 of the Commission's Rules, and the facility is exempt from FCC regulatory fees, pursuant to Section 1.1162 of the Rules.

## **ATTACHMENT A**

### **WNEO-DT: Summary of Call Center Intake from Viewers following Early DTV Transition**

- We received approximately 150 calls since 11/19/08. We had approximately 10 people answering questions, including well-trained employees and temporaries.  
We also received approximately 66 e-mails from the Youngstown/Western Pennsylvania area.
- All of these callers have reported an inability to continue to view the WNEO-DT signal. We tried to ascertain whether the callers were making technical errors including STB installation, type of antenna, incorrect antenna aiming, etc. We estimate that 100% could receive our analog signal and 75% could receive our previous digital signal. (Some viewers did not have STBs or DTV sets prior to the switch making it difficult to get accurate estimates.)  
We feel that the problems were definitely not the result of viewer error. The viewers could receive the commercial DTV stations in the Youngstown market without problems.

Areas reporting that they cannot receive WNEO-DT at 44 kW:

#### **OHIO**

Alliance  
Austintown  
Berlin Center  
Boardman  
Brookfield  
Campbell  
Canfield  
Cortland  
Columbiana  
Girard 44420  
Hiram  
Hubbard  
Kinsman  
Liberty  
Lowellville  
Mahoning County – Southeast of Youngstown  
New Alexander  
Niles  
Poland  
Salem  
Vienna  
Youngstown – 44507, 44509, 44511  
South side of Youngstown  
West side of Youngstown

#### **WESTERN PA**

Cranberry Twp, PA  
Greenville  
Grove City  
Hermitage  
Mercer  
New Castle, PA  
New Wilmington 16142  
Patterson Twp, PA  
Sharpsville 16142  
Sharon  
Western Crawford County, PA  
Western Pennsylvania