

**REQUEST FOR
SPECIAL TEMPORARY AUTHORIZATION**

Pursuant to the Commission's *Public Notice* released February 5, 2009, FCC 09-6, and the *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Report and Order, 23 FCC Rcd 2994 (2007) (the "*Third Order*"), ¶¶ 121-123, Young Broadcasting of Sioux Falls, Inc. ("Young"), the licensee and permittee of KDLO-TV and KDLO-DT, Reliance, South Dakota, hereby respectfully requests special temporary authorization ("STA") to operate satellite television station KDLO-DT on its post-transition digital channel as of February 18, 2009 (KDLO is a satellite of KELO-TV, Sioux Falls, South Dakota).

KDLO-DT's pre-transition DTV facility is licensed for Channel 2 operation in FCC File Number BLCDT-20030820ADF. KDLO-DT's post-transition DTV facility is authorized for Channel 3 operation by construction permit in FCC File No. BMPCDT-20080618AJF. KDLO-TV's analog operation is also licensed for Channel 3 operation (in FCC File No. BMLCT-20040920AAV). In other words, KDLO-DT will be going back to its analog channel for final post-transition operation.

On December 5, 2008, Young notified the Commission that its Channel 2 pre-transition DTV facility would be permanently silent as of January 12, 2009. As described in that notification (and in Young's various DTV Transition Reports filed for KDLO on FCC Form 387), termination of KDLO-DT's pre-transition digital operation was necessary in order to prepare for the station's post-transition digital operation on February 18, as the digital transmitter had to be physically moved to a new location and converted from Channel 2 operation to Channel 3 operation in order for the station to effectuate a timely transition to final post-transition operation on February 18. The early termination of KDLO's pre-transition digital operation was directly related to the station's post-transition digital operation, and it would be economically unreasonable and irresponsible for Young to re-convert the transmitter back to Channel 2 digital operation (if Young could even schedule Harris to make such a re-conversion in a timely fashion) and re-move the transmitter back to its prior physical location; in short, Young is faced with a decision to operate KDLO only as an analog facility on Channel 3 or to operate KDLO only as a digital facility on Channel 3.

In connection with its necessary early termination of the pre-transition digital facility, the station has been notifying viewers that its digital signal would return to the air on February 18. Since January 12, the station has received viewer complaints about the lack of a digital signal after this satellite station had served its viewers with a full-power digital signal for more than five years. Thus, since January 12, the station has been limping along as an analog-only facility and wishes to be able to once again provide viewers with a digital service.

**Young Broadcasting of Sioux Falls, Inc.
KDLO-DT, Florence, SD
Post-Transition DTV STA Request**

According to the *Public Notice* and *Third Order*, a station may request permission to operate its post-transition facility before the national transition deadline, provided it demonstrates that it will (1) not cause impermissible interference to any authorized analog or pre-transition digital stations; (2) maintain at least its current digital service; and (3) commence full, authorized post-transition operations on the transition deadline.¹

To establish compliance with these three STA criteria, Young engaged consulting engineer Joseph M. Davis, P.E. Mr. Davis's engineering statement is attached hereto (the "Engineering Statement"). The Engineering Statement demonstrates that all three criteria are met by Young's proposed operation of KDLO-DT's post-transition facility. Indeed, the Engineering Statement demonstrates that KDLO-DT's post-transition facility will serve more viewers than either KDLO-TV's analog facility or pre-transition digital facility ever did.

For the foregoing reasons, KDLO-DT is eligible and respectfully requests STA to operate with its post-transition digital facility, effective on February 18, 2009.

Contemporaneously herewith, Young is notifying the Commission, via CDBS, of its intent to terminate analog operations on February 17, 2009, which is necessary in order for Young to put the post-transition facility on the air with a digital signal. Termination of the station's analog signal has triggered the viewer notification requirements set forth in the *Public Notice*, and Young has commenced those notifications and has scheduled all required notifications.

* * * * *

¹ See *Public Notice* at 6; *Third Order*, 23 FCC Rcd at 3051-52, ¶¶ 121-23.