

EXHIBIT 21

Request for Special Temporary Authorization

NCE Station KUHT-DT, Houston, TX (Facility ID No. 69269)

The University of Houston System (“UHS”), licensee of noncommercial educational television station KUHT-DT, Houston, Texas, respectfully requests Special Temporary Authority (“STA”) to operate at a variance from its DTV station’s authorized parameters. As explained below, UHS plans to license KUHT’s initial post-transition DTV facility shortly to meet its transition-related build-out requirements, and then operate as proposed by this STA to improve local reception and better serve its community.

Station KUHT is currently operating on NTSC Channel 8 and pre-transition DTV Channel 9, and will convert to post-transition operations on DTV Channel 8. UHS applied for and received KUHT’s initial post-transition DTV Channel 8 construction permit in FCC File No. BPEDT-20080314ABU, and a “maximization” permit in File No. BMPEDT-20080619AJE. UHS currently plans to license the initial, smaller post-transition DTV facility in File No. BPEDT-20080314ABU by the February 17, 2009 transition date.

The current KUHT analog Channel 8 operation utilizes a directional antenna, and the initial post-transition DTV Channel 8 permit specifies the same directional antenna and 20 kW ERP. KUHT’s DTV Channel 8 maximization permit specifies a non-directional antenna at 34.3 kW ERP. With this application, KUHT seeks STA to operate on DTV Channel 8 using the station’s existing directional antenna, but at the higher power level of 34.3 kW ERP, in order to aid viewer reception (given that viewers with indoor antennas have reported significant reception difficulties). The attached application and engineering statement specify the complete technical details for the proposed STA.

A grant of STA will serve the public interest by allowing KUHT to improve local coverage and reception of its noncommercial educational television service in the Houston area following its digital Channel 8 conversion. UHS will have already met its DTV build-out requirements with the completion of its full, authorized post-transition DTV facilities. Operation under the STA at the maximization power level (but using the existing directional antenna) will allow KUHT to improve service and coverage until the full maximization facility can be completed with the new omnidirectional antenna.

The Commission has acknowledged that the “stations that face the most significant amount of construction to finalize their post-transition facilities are those that are moving to a different channel for post-transition operation” – such as KUHT.¹ In addition, as the Commission has recognized throughout the transition process, special regulatory relief is appropriate for noncommercial educational and non-top-four network stations (such as noncommercial PBS affiliate KUHT).²

¹ Report and Order, MM Docket No. 07-91, FCC 07-228 (Rel. Dec. 31, 2007) at ¶ 64.

² See *id.* at ¶ 97.

UHS is noncommercial educational licensee and operates KUHT-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. KUHT was America's first public television station and was one of the founding stations of the Public Broadcasting Service (PBS) in 1969. The station serves to empower, engage and enrich the lives of the people of Southeast Texas.