

**Engineering STA Request  
Exhibit 21  
August 18, 2008**

Eagle Creek Broadcasting of Corpus Christi, LLC (“Eagle Creek”), the licensee of broadcast television station KZTV(TV), Corpus Christi, Texas (Facility ID No. 33079), pursuant to 73.1635 of the Commission’s Rules, hereby requests Special Temporary Authority (“STA”), to the extent it proves necessary, to operate KZTV digitally on its pre-transition channel following the DTV transition on February 17, 2009. Such operation is permitted if certain criteria are met.<sup>1</sup> As demonstrated in the Technical Specifications of this application, KZTV would meet those criteria.

KZTV currently operates on analog Channel 10 and digital Channel 18. KZTV elected to operate on Channel 10 following the digital transition, and was allotted post-transition facilities on that channel (the “Appendix B” facilities).<sup>2</sup> KZTV subsequently filed a construction permit application for its intended post-transition facilities. *See* BPCDT-20080324AAT. That application proposed facilities, the proposed contour of which, extends beyond that of the Appendix B facilities.

Both the Appendix B facilities and the facilities proposed in KZTV’s construction permit application are awaiting Mexican concurrence.

In the event that Mexican concurrence is not obtained for either the Appendix B facilities or KZTV’s construction permit by February 17, 2009, KZTV proposes to continue digital operation on its pre-transition channel, Channel 18, pending Mexican concurrence, and seeks this STA accordingly.

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<sup>1</sup> The station is expected to serve at least the same population that receives its current analog and DTV service and may not cause impermissible interference to other stations or prevent other stations from making the digital transition. *See* Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television, 23 FCC Rcd 2994, 3038 (2007).

<sup>2</sup> *See* Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service, 22 FCC Rcd 15581, Appendix B (2007).