

## EXHIBIT 21

### KRCR-TV, Redding, California

KRCR-TV, Redding, California (the “Station”) respectfully submits this request for Special Temporary Authority (“STA”), which supplements and supersedes the STA request in FCC File No. BDSTA- 20090624ACX.

The Station seeks authorization to operate with facilities at variance from those authorized by the Station’s construction permit (*see* FCC File No. BMPCDT-20080613ABE) and currently subject to an application for license to cover (*see* FCC File No. BLCDDT-20090622AEG). By this request, the Station seeks authorization to operate with an effective radiated power (“ERP”) of 25.2 kW. Although this ERP would exceed the benchmark power level established by Section 73.622(f) of the Commission’s rules (47 C.F.R. § 73.622(f)), grant of the requested relief would be in the public interest and consistent with the Commission’s rules as well as other recent, granted STA requests.<sup>1</sup>

The Station’s pre-transition digital operations were on UHF channel 34, but its final digital operations are on VHF channel 7.<sup>2</sup> Since its transition to final digital operations on June 12, 2009, the Station has received numerous reports from viewers of reception problems with respect to the Station’s digital signal.

In response to a request from Commission staff for supplemental factual information regarding the superseded STA request, the Station notes the following:

**Widespread Viewer Impact.** Since making its transition to VHF digital operations, the Station has received approximately 1,200 calls from viewers experiencing difficulty receiving the Station’s signal.<sup>3</sup> In addition, the Station has received approximately 120 e-mails about this issue. The calls primarily have come from the following communities:

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<sup>1</sup> The FCC recently granted the request of WCYB, KRCR’s sister station, to increase power to 29.9 kW on VHF channel 5 in order to address similarly widespread reception problems. *See* FCC File No. BDSTA-20090708AGZ (filed July 8, 2009, granted July 15, 2009).

<sup>2</sup> Press reports indicate that many stations that have moved their digital operations from UHF to VHF channels are experiencing this problem. *See, e.g.,* Glen Dickson, “DTV: A Few Tweaks Left,” *Broadcasting & Cable* (June 20, 2009) (noting that “many of these stations were received reliably on their former UHF assignments but are now hard for viewers to find, even for those with an adequate UHF/VHF antenna”).

<sup>3</sup> In a recent application similar to the instant request, Station WPVI-TV requested and received an STA to increase its power on channel 6 by 6 dB, from 7.56 kW to 30.2 kW. *See* FCC File No. BLDSTA-20090619ABQ (filed and granted on June 19, 2009). We note that WPVI-TV’s application did not indicate how many viewer calls regarding reception problems had been received by WPVI-TV, and the engineering statement submitted with a related application noted only that the station “has been receiving calls from its viewers who are no longer able to receive WPVI’s DTV signal on channel 6.” *See* FCC File No. BPCDDT-20090617ADQ.

Anderson, Chico, Happy Valley, Redding (the Station's community of license), and Shingletown. Approximately 16 percent of the 297,000 viewers in the Station's market, or 47,520 people, rely on over-the-air television signals. Thus, to date, over 2.5 percent of the market's over-the-air viewers have called the Station because of difficulty in receiving the Station's signal.

Approximately ninety percent of over-the-air viewers reporting problems use indoor antennas, although a significant number use outdoor antennas. The Commission has been flexible in granting relief to television stations attempting to provide more robust digital television service to formerly served viewers, including those viewers relying on indoor antennas. *See, e.g.*, FCC File No. BDSTA- 20090623ABC (STA request in which the applicant noted that "the majority of callers to KTVB's call center were either unwilling or unable to install roof-top VHF antennas. To resolve the indoor reception issue, KTVB is requesting [a] special temporary authorization ('STA') to increase its power...") (filed June 23, 2009, granted June 24, 2009).

**Necessary Power Increase.** The Station seeks authorization to operate with an effective radiated power ("ERP") of 25.2 kW. As explained in the attached engineering statement, this power increase is not expected to entirely solve the problem, but it is the highest power level that the Station can achieve with its existing equipment.

**De Minimis Interference.** The facilities specified in this request for STA would not cause excessive interference to other television stations. Section 73.616(e) of the Commission's rules provides that "[a]n application will not be accepted if it is predicted to cause interference to more than an additional 0.5 percent of the population served by another post-transition DTV station." As shown in the attached engineering analysis, only one station would receive interference from the proposed power increase (KGO-TV), and the increased interference would be *de minimis* (0.14 percent to KGO-TV's Appendix B facilities and 0.21 percent to that station's current construction permit).

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A rule waiver "is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule."<sup>4</sup> First, special circumstances warrant a deviation from the power limit specified in § 73.622(f) because the Station's actual coverage is severely limited due to the unique characteristics of the VHF spectrum. The Station believes that increased power would enable it to overcome the significant coverage difficulties described above and provide a more robust digital television signal to the public. Second, strict adherence to § 73.622(f) would deprive a significant number of viewers of the free, over-the-air television service that they used to receive. "It is a priority of the Commission that all Americans continue to receive the

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<sup>4</sup> *Douglas-Omaha Tech. Comm'n*, 21 FCC Rcd 9277 at para. 5. *See also WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969); 47 C.F.R. § 1.3 (providing for waiver of FCC rules "for good cause shown").

television broadcast service that they are accustomed to receiving following the digital transition.”<sup>5</sup> The Station respectfully submits that a waiver is warranted in these special circumstances, which mirror the circumstances faced by other stations for which the FCC has granted relief.

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<sup>5</sup> See *Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations*, Notice of Proposed Rulemaking, 23 FCC Rcd 18534, at para. 3 (2009).