

EXHIBIT 12
Request for STA

The Board of Trustees of The University of North Carolina at Chapel Hill (“WUNC”), licensee and permittee of non-commercial educational FM translator station W216BE, Buxton, North Carolina (hereinafter the “Buxton Translator” or “W216BE”), hereby requests special temporary authority (“STA”) to operate at parameters slightly different from those authorized by the Station’s license (BLFT-19990420TB) or construction permit (the “CP”) (File No. BPFT-20070807ABN).

The Buxton Translator is part of the WUNC’s statewide, public non-commercial radio network, which also consists of a main production facility at WUNC(FM), Chapel Hill, North Carolina, and four other full-power analog and digital satellite radio stations. These stations comprise the North Carolina Public Radio network, whose educational public affairs, news, music, and arts programming originates from the WUNC studios in Chapel Hill. The Buxton Translator plays an important role in this network by rebroadcasting WUNC(FM) to the Buxton, North Carolina community. As such, the Buxton Translator brings thousands of hours of local, state, and national public radio broadcast programming to Buxton area residents and visitors every year. Programs such as National Public Radio’s *Morning Edition* and *All Things Considered*, WUNC’s own *The Story with Dick Gordon* and *The State of Things with Frank Stasio*, and BBC’s *World Service* are a few examples of the unique news and information programming provided by the Buxton Translator to listeners who have come to rely on the Station’s service. (A complete schedule of North Carolina Public Radio’s programming is available at <http://wunc.org/schedule/schedule.pdf>.)

As WUNC has previously notified the Commission, W216BE has been experiencing technical issues for some time. *See, e.g.*, BLSTA-20071106AAD (silent STA request, granted Nov. 8, 2007); BLESTA-20080502AAL (extension request for silent STA, pending). Those technical issues appear to have been abated by WUNC’s use of a two bay full wave spaced Shively antenna installed at the licensed transmitter site, at a distance of approximately 5-6 meters from the licensed antenna. The antenna that is subject to the instant request is the same make/model antenna permitted by the Buxton Translator’s current CP.

According to WUNC’s engineers, because the parameters sought by the instant request include an antenna height that is lower than the licensed facility and an ERP that is less than the licensed facility, the Buxton Translator’s STA contour falls entirely within the predicted contour of the licensed facility.

As described in correspondence to the Commission dated February 19, 2009, WUNC, a public, non-commercial educational broadcaster has been working towards fulfillment of its CP while also endeavoring to diagnose, restore, and maintain operation of the Buxton Translator at

The Board of Trustees of The University of North Carolina at Chapel Hill
Request for STA
W216BE, Buxton, North Carolina
Facility ID No. 89947

its present site. These twin goals that affect the same facility present a unique circumstance, and this public, non-commercial educational broadcaster has been carefully balancing achievement of these twin objectives while also attempting to maintain the status quo. The operation contemplated by the instant request allows WUNC to continue to provide service to Buxton, North Carolina, and surrounding areas on North Carolina's Outer Banks. This region is particularly vulnerable, given its location, to hurricanes and other severe weather. As an important source of news and information programming, including emergency information, it is important to Buxton residents and visitors that the Buxton Translator remains on the air under the requested parameters, while WUNC continues to work towards fulfillment of the CP.

Absent a grant of the instant STA, WUNC would likely have to take W216BE off the air again. The loss of the Station's service by going silent would be a significant loss to the public, as the Station is a critical source of emergency information and the only source of the kind of radio programming offered by WUNC. As described above, Buxton is a geographically isolated and remote community where no other station provides the degree or nature of news and informational programming that is provided by the Buxton Translator. Particularly in light of WUNC's good faith efforts to restore service to this community in the face of ongoing technical and operational challenges—including the remoteness of the community and the strained financial and technical resources of this non-commercial public broadcaster—loss of this Station's service would be a substantial detriment to the public interest.

In light of the foregoing, grant of the instant STA request would serve the public interest.

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