

**Exhibit 21**

**Request for STA**

Applicant BlueStone License Holdings Inc. (“BlueStone”), licensee of KAEF(TV), NTSC Channel 23, and KAEF-DT, DTV Channel 22, both Arcata, California (the “Station”), respectfully requests Special Temporary Authority (“STA”) to operate KAEF-DT with facilities at variance from those authorized by the Station’s license (File Number BLCDDT-20070126AFH). Grant of the requested relief will not result in expansion of the Station’s digital service contour and therefore would be consistent with the Commission’s pending “freeze” concerning expansion of service area.<sup>1</sup>

In reviewing its stations’ technical facilities in light of the recently released post-transition digital Table of Allotments,<sup>2</sup> BlueStone discovered certain discrepancies between the as-built KAEF-DT facilities and those authorized by the Station’s license. Specifically, the license authorizes a height of radiation center above average terrain (“HAAT”) of 535 meters and a height of radiation center above ground (“AGL”) of 114.3 meters. It appears that the antenna would have been installed at this height had it been possible to attach the antenna underneath a candelabra arm appurtenance on the tower that KAEF-DT shares with another station (KEET(TV), Eureka, California). However, due to structural engineering concerns that arose at the time of installation, the antenna was installed on the top of the candelabra. Therefore, the antenna’s HAAT is 550 meters (127.7 meters AGL).

BlueStone is filing this application for an STA in order to address the discrepancy between the authorized and as-built antenna height for KAEF-DT. BlueStone notes that to avoid an expansion of the KAEF-DT noise-limited service contour beyond that authorized by the license, the Station has reduced its effective radiated power (“ERP”) from that authorized by the license (50 kW) to 45 kW. Concurrently herewith, BlueStone is filing an application for a construction permit for minor modification of KAEF-DT’s technical parameters to conform to the facilities as constructed.

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<sup>1</sup> Public Notice, “Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes,” DA 04-2446 (rel. August 3, 2004).

<sup>2</sup> See *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking, at Appendix B, MB Dkt. No. 87-268, FCC 07-138 (rel. August 6, 2007).