

## **Exhibit 21 to Request for Engineering STA**

In accordance with paragraph 92 of Report and Order, *Third Periodic Review of the Commission's Policies Affecting the Conversion to Digital Television*, FCC 07-228 (2008) ("Third Periodic DTV Report and Order"), Sunflower Broadcasting, Inc. ("Sunflower"), licensee of KSCW-DT, Wichita, KS (Facility ID Number 72348), files this request for Special Temporary Authority (STA) to remain on its pre-transition digital channel 31 for a period of time, not to exceed four months, past the February 17, 2009 DTV transition date while construction of its post-transition facilities is finalized. KSCW-DT requests approval to continue operations on its pre-transition digital channel 31 using its pre-transition licensed facilities until KWCH-DT, Hutchinson, KS (Facility ID Number 66413), begins post-transition operations on digital channel 12. At that point, KSCW-DT will switch its digital operations to channel 19, using the existing KWCH-DT channel 19 facility, a change which, other than changing the feed from the KSCW studios to use the existing link to the channel 19 digital transmitter and antenna, will require no construction.<sup>1/</sup>

As required by Paragraph 92 of the *Third Periodic DTV Report and Order*, Sunflower performed Longley-Rice analyses comparing KSCW's current analog and digital service populations. As shown in Appendix A, these analyses confirm that no analog TV over-the-air viewers will lose service if KSCW-DT is permitted to stay on its pre-transition digital channel 31

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<sup>1/</sup> An application specifying the KWCH-DT pre-transition channel 19 facility as the post-transition facility for KSCW-DT is pending before the Commission. File No. BPCDT-20080408AAK.

after the transition date. And because KSCW-DT will continue providing digital service on channel 31 at its full authorized facilities, no over-the-air digital TV viewers will lose service.

Appendix B is an engineering statement demonstrating that continuing operation on digital channel 31 past the transition date will not cause impermissible interference to any other station in excess of the 0.5% limit established in the *Third Periodic DTV Report and Order*. In addition, KSCW-DT will not prevent any other stations from making their transition due to its post-transition operation on its pre-transition facility.

Sunflower will, in accordance with the *Third Periodic DTV Report and Order*, make all required announcements to the public.

Therefore, Sunflower requests that the Commission grant this request to permit KSCW-DT to remain on its pre-transition digital channel 31 for a period of time, not to exceed four months, past the DTV transition date.

## **Appendix A**

### **Population Analysis**

In order to confirm that if it were to remain on its pre-transition digital channel 31 past the DTV transition date KSCW-DT will be able to serve at least the same population that receives its current analog TV service, Sunflower had the engineering firm of Cavell, Mertz & Associates, Inc. perform a Longley-Rice analysis using Census 2000 population counts. The results of this analysis are below:

#### **KSCW NTSC Ch. 33 Facility (BLCT-20010717AAW)**

698,208 persons within Grade B contour

698,181 not affected by terrain

#### **KSCW DTV Ch. 31 Facility (BPCDT-20080408AAK)**

748,059 not affected by terrain

747,336 Interference Free

## **Appendix B**

## ENGINEERING STATEMENT

prepared for

**Sunflower Broadcasting, Inc.**

KSCW(TV) Wichita, Kansas

Facility ID: 72348

Sunflower Broadcasting, Inc. ("SBI") is the licensee of television stations KSCW(TV), Channel 33, Wichita, KS (see BLCT-20010717AAW) and KWCH-TV/DT, analog Channel 12 and pre-transition digital Channel 19, Hutchinson, Kansas. In keeping with the Commission's recent grant of an alternative Channel assignment<sup>1</sup> for KSCW, SBI submitted an Application for Construction Permit<sup>2</sup> for post-transition KSCW(DT) that specifies the existing KWCH-DT facility. The facility will become operational following termination of the KWCH-TV analog transmission on Channel 12 after February 17, 2009.

Following the cessation of KWCH-TV analog Channel 12 broadcasting, SBI is authorized<sup>3</sup> to replace the KWCH-TV Channel 12 antenna and transmission line and make modifications to the transmitter in preparation of KWCH-DT digital broadcasting on Channel 12. Until this work is completed, continued operation of the KWCH-DT pre-transition Channel 19 facility is necessary, as explained in the Form 387 filed for KWCH-DT. Until the Channel 19 facility is available, KSCW(DT) intends to continue broadcasting utilizing its pre-transition, Channel 31 facility past the February 17, 2009 transition date to facilitate installation of the Channel 12 digital facility.

Accordingly, interference studies were performed in accordance with the methods set forth in the Commission's OET Bulletin No 69 ("OET-69"). The results of the studies, summarized in **Table I**, indicate that no new interference in excess of the 0.5% limit established in the Commission's Third Periodic Review<sup>4</sup> would be caused by post-transition operation of the pre-transition facility following the transition.

<sup>1</sup> See *Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order, Advanced Television Systems and Their Impact Upon the Existing Television Broadcasting Service*, MB Docket No. 87-268, FCC 08-72, Released March 6, 2008 at paragraph 72, Appendix D4, and footnote 185.

<sup>2</sup> See BPCDT-20080408AAK.

<sup>3</sup> See BPCDT-20080313ACP

<sup>4</sup> See *Report and Order, Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, MB Docket No. 07-91, FCC 07-228, Released December 31, 2007.

Table I  
**INTERFERENCE STUDY RESULTS**  
 prepared for  
**SUNFLOWER BROADCASTING, INC.**  
 KSCW(TV) Wichita, Kansas  
 Facility Id: 72348  
 Ch. 31 1000 kW 345 m

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>7th R&amp;O Table Baseline (2000 Census)</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference Population</u>	<u>Percentage</u>
31	KWBM(TV)	Harrison, AR	BPCDT-20080331AEU	533,000			---		
31	KWBM(TV)	Harrison, AR	Reference	533,000			---		
31	KWNL-CA	Springdale, AR	BPTTA-20030829BDQ				---		
31	KWNL-CA	Winslow, AR	BSTA-20071004ABU				---		
31	KCWE(TV)	Kansas City, MO	BLCDT-20051014ABT	2,227,000	2,227,090	2,230	4,890	2,660	0.119 %
31	KCWE(TV)	Kansas City, MO	Reference	2,227,000	2,227,090	2,230	4,890	2,660	0.119 %
31	KOET(TV)	Eufaula, OK	BLEDT-20060601BIT	600,000	600,527	262	472	210	0.035 %
31	KOET(TV)	Eufaula, OK	Reference	600,000	600,527	262	472	210	0.035 %