## **EXHIBIT 21**

## **Notification of Emergency Antenna Operation and Request for Special Temporary Authority**

NCE Station KUAT-DT, Channel 30, Tucson, AZ Facility ID: 2731 / FRN: 0003732716

On behalf of the University of Arizona ("UA") and pursuant to Section 73.1680 of the FCC's rules, we hereby notify the FCC of the planned use of an emergency antenna for noncommercial educational digital television Station KUAT-DT, Tucson, Arizona, as needed to restore program service to the public following damage to the station's authorized digital antenna which rendered the licensed facility inoperable. In addition, pursuant to Section 73.1635 of the Commission's rules, we respectfully request Special Temporary Authority ("STA") for operation of the emergency antenna facility for a period of 120 days.

UA recently encountered difficulties with the operation of the KUAT-DT antenna due to ice damage caused by winter weather conditions, and arranged for a tower crew to investigate the situation on February 21, 2009. UA determined that the KUAT-DT facility had suffered two burned antenna panels and feed lines. Accordingly, UA has contacted the manufacturer with regard to repair and replacement parts. The manufacturer is also making plans for another technician to examine the affected equipment.

While UA pursues the repairs necessary to restore full licensed operation of KUAT-DT, it will undertake a temporary, emergency antenna operation to maintain service to its local community. UA expects to receive the parts needed for the emergency antenna use this week, and plans to commence the temporary operation by March 16 or 17, 2009. Although Section 73.1680 of the Rules does not require prior notification of emergency antenna operation, UA is able to provide advance notice in this circumstance.

The technical parameters for the emergency antenna operation and proposed STA are specified in the attached application. Notably, the temporary antenna operation is equivalent to that utilized by KUAT-DT in 2007 (*see* granted STA in FCC File No BDSTA-20070817AAZ), following an earlier instance of equipment problems. As was the case at that time, in order to keep the predicted ground–level RF power density below 100% of public limit, the ERP of the emergency antenna will be limited to 130 kW. This operation will result in a maximum predicted ground-level power density of 99% of the public limit, taking into account all of the other stations at the same Mt. Bigelow antenna farm (including KUAT-TV and KUAT-FM). Accordingly, a grant of this STA application would not constitute a major environmental action under section 1.1307 of the FCC rules.

In addition, because the emergency antenna has less power than the licensed KUAT-DT facilities (130 kW ERP omni for the emergency operation, as opposed to 668 kW ERP omni for the licensed KUAT-DT facilities) and a lower radiation center height (22.9 m AGL for the emergency antenna, as opposed to 49.1 m AGL for the licensed KUAT-DT antenna), it follows that there will be no extension of the KUAT-DT DTV threshold contour. Therefore this emergency antenna operation poses no interference issues.

KUAT-DT Exhibit 21 Page 2 of 2

A grant of STA will serve the public interest because it will authorize UA to maintain its existing noncommercial educational DTV television broadcasting for its local viewers in the Tucson, Arizona area despite the current equipment problems beyond its control. The requested STA will also allow UA the time necessary to pursue the repairs needed to restore the station's licensed operation, and will allow KUAT-DT to continue operations during this critical period involving the DTV transition and impending analog shut-off.

UA is a noncommercial educational licensee and operates KUAT-DT on a noncommercial educational basis. This application is therefore exempt from FCC filing fee requirements pursuant to Section 1.1114 of the Commission's Rules, and the facility is exempt from FCC regulatory fees, pursuant to Section 1.1162 of the Rules.