

Exhibit 38  
Request for STA

The University of North Carolina ("UNC-TV"), licensee of the six analog TV Translator facilities listed in the table below, is also licensee of full-power analog television station WUNF-TV, Asheville, North Carolina (Facility ID No. 69300). As set forth in the table below, UNC-TV holds a digital displacement construction permit for each of the 6 analog translator facilities.

<b>Translator Facility ID No.</b>	<b>Analog Call Sign</b>	<b>Community of License</b>	<b>Digital Displacement CP File No.</b>
69015	W59AD	Andrews, etc., NC	BDISDTT-20060802ASJ
69389	W52BA	Black Mountain, NC	BDISDTT-20060727AHF
69220	W68DM	Brevard, NC	BDISDTT-20060727AHH
69291	W67DV	Burnsville, NC	BDISDTT-20060802ASG
69388	W23AF	Cullowhee, NC	BDISDTT-20070125AAV
69058	W60DA	Franklin, etc., NC	BDISDTT-20070910ADF

Each of the analog translator facilities listed above is fed by the WUNF-TV analog signal. In early June, UNC-TV plans to commence operation of the digital facilities governed by the above-referenced CPs, so that they can continue to provide service to WUNF-TV viewers after June 12 when WUNF-TV will be a digital-only station. Normally, upon commencement of operation of a digital displacement translator facility, the analog facility is taken off the air, as it is no longer authorized to broadcast.

The instant STA request is prompted by the fact that, following June 12, 2009, UNC-TV will be operating analog WUNF-TV for a two-week period as an analog "Nightlight" station. The instant STA request seeks authority to operate the translator referenced herein for the limited period of two weeks to serve as a translator for the WUNF-TV analog Nightlight facility. (A separate STA request is being contemporaneously filed for each of the six translators referenced above.) By doing so, UNC-TV will be able to serve over-the-air viewers who received WUNF-TV's signal via the corresponding analog translator facility with the station's Nightlight signal, which will help to facilitate the transition of such viewers to digital. (Viewers who have already successfully made the transition to digital will be able to receive WUNF-TV's digital signal via the corresponding digital displacement translator.)

Of course, if UNC-TV were not bringing the new digital displacement translators on the air at this time, UNC-TV would still be authorized to operate the 6 analog translators listed above. In other words, there is no new interference issue posed by the instant request. Facilitation of the DTV transition and provision of WUNF-TV's analog Nightlight programming service to viewers who have traditionally received WUNF-TV over-the-air via translator are important public interest goals that warrant grant of the requested STA.

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