

ATTACHMENT TO EXHIBIT 22

Rural California Broadcasting Corporation (*RCBC*), the licensee of both TV Translator Station K35DO (the *Translator*) and its primary station, Non-Commercial Educational Station KRCB, Channel 23, Cotati, California, FCC Facility ID No. 57945, hereby requests an Engineering STA to operate the Translator at variance from its licensed parameters.

The Translator is licensed to operate in the NTSC signal mode, and to generate 129 Watts of horizontally polarized Effective Radiated Power from a transmitter site having the NAD 1927 coordinates:

North Latitude 38° 55' 39"; West Longitude 123° 06' 50".

The licensed antenna is a Scala Model No. ODD940404IA directional array, FCC Antenna ID No. 22191. See FCC File No. BLTT-19940509JJ.

By means of this request, RCBC seeks authority from the Commission to operate the Translator with its licensed ERP, HAAT, and antenna, but in the ATSC Digital mode rather than in the NTSC analog mode. Operation in the Digital mode is the only variation from the licensed parameters that this STA request proposes.

The circumstances that prompt this request are extraordinary and fully warrant a grant of temporary authority to operate at variance to the Commission's rules.

As RCBC has previously reported to the Commission, the Translator is currently dark, due to damage caused by rodents at the remote, rural transmitter site. The damage in turn caused the equipment to fail. As RCBC has also previously reported, the site owner had raised concerns about the risk of fire danger posed by keeping energized the transmission line that feeds utility power to the wooded site energized during the fire season. As required, RCBC has obtained extensions of its self-invoked Dark Authority.¹

RCBC has obtained authority to permanently relocate the Translator and to convert it to a Digital facility.² In light of the general migration of over-the-air television viewers to the Digital mode, conversion to Digital at the licensed site would better serve the public interest.

¹ See FCC File Nos. BLSTA-20090716ACO and BLESTA-20091202ACI.

² See FCC File No. BDFCDTT-20090824AJS.

Particularly with respect to the Translator, in light of the planned and authorized conversion of K35DO to the Digital operating mode, and particularly in light of RCBC's viewer-supported nature, the most prudent course of action is for RCBC to apply its limited financial resources toward the purchase of new Digital translator hardware for temporary use at the licensed site. RCBC can later use that equipment at the site authorized by Flash-Cut Construction Permit BDFCDTT-20090824AJS.

Otherwise, to prevent the Translator's license from expiring by operation of § 312(g) of the Communications Act, 47 U.S.C. § 312(g), RCBC would have to expend scarce resources to repair the NTSC equipment that comprises the current facility, only to later abandon that equipment upon implementation of Flash-Cut Construction Permit BDFCDTT-20090824AJS, at which point the repaired equipment will have become useless to RCBC.

Clearly, then, the grant of this STA request will further the public interest. The grant will enable RCBC to:

1. resume providing Non-Commercial Educational television service to the Translator's rural service area, which, due to terrain shielding, receives limited television service from over-the-air sources;
2. furnish improved-quality signals to the viewing public, due to the inherent, superior nature of Digital transmissions; and
3. increase from one to three the number of audiovisual streams that RCBC provides to the members of the public served by K35DO, thereby providing that population with a greater selection of public-television programming.

RCBC expects operations under the requested STA to last for 180 days. The site owner has indicated that he will allow interim operations of K35DO during the periods characterized by low risk of fire.