

**Barrington Traverse City License LLC
WPBN-TV, Traverse City, MI**

Exhibit 21

STA REQUEST

POST-TRANSITION DTV CHANNEL 50

Barrington Traverse City License LLC (“Barrington”), licensee of Station WPBN-TV (“WPBN”), Traverse City, Michigan (Fac. ID 21253), by this application requests Special Temporary Authority (“STA”) to operate post-transition with its licensed Channel 50 digital facilities in Traverse City.¹ The parameters of the requested facilities are set forth in detail in the application. Simultaneously herewith Barrington is filing an STA request seeking temporary authority to operate post-transition on Channel 7 with 500 watts ERP from the site of its licensed analog facilities. The proposed concurrent Channel 7/Channel 50 operations, as reflected in the respective STA requests, will commence on February 18, 2009. Engineering details relevant to both operations are provided in the attached statement of Joseph M. Davis, P.E.

Barrington has filed an application for post-transition digital facilities on Channel 7 with 15.4 kilowatts ERP at its analog site (File No. BPCDT-20080321ACW) (the “Application”). The Application remains pending and is not expected to be acted upon prior to February 17, 2009, when Barrington must cease analog transmissions on WPBN-

¹ WPBN was allotted Channel 50 as its interim DTV channel and has been operating facilities on Channel 50 at a site adjacent to its Traverse City studios since 2003 (File No. BLCDDT-20030721ACJ). WPBN has elected to return to its analog Channel 7 for post-transition operations.

TV.² The station's digital Channel 50 facilities serve the northern portion of the area within the WPBN analog Grade B contour,³ including the city of license and the core of the Traverse City DMA. Continued service to this area following termination of analog transmissions is vital to viewers and to the viability of the station itself. However, the proposed reduced power STA operations on digital Channel 7 at the WPBN analog site are predicted to leave some viewers without service on February 18, 2009.⁴ Loss of service to analog viewers has been a stated concern of the FCC.⁵ Grant of the requested post-transition Channel 50 STA operation will allow WPBN to continue to serve many viewers who would otherwise lose service on February 18, 2009. Temporary post-transition operation on Channel 50 will meet the Commission's goal of minimizing loss of service to existing analog viewers and, therefore, is believed to be in the public interest.

² The Application is the subject of an Informal Objection by WOOD License Company, LLC ("LIN"), licensee of WOOD-DT, Channel 7, Grand Rapids, Michigan. LIN also filed a Petition for Reconsideration of the Appendix B facilities specified for WPBN in the Eighth Report and Order, *Advanced Television Systems and Their Impact Upon the Existing Television Service*, MB Docket No. 87-268 (released March 6, 2008) ("*Eighth Report and Order*"). The Petition also remains pending. LIN has been consulted and participated in discussions with the FCC and Barrington relating to WPBN's post-transition operations and agreed to WPBN's temporary operation on Channel 7 (as requested in the STA application filed concurrently) and Channel 50 (as licensed).

³ See Engineering Statement, Figure 1.

⁴ *Id.*

⁵ See Digital Television Distributed Transmission System Technologies, MB Docket No. 05-312, *Report and Order*, FCC 08-256, released November 7, 2008; Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations, MB Docket No. 08-253, *Notice of Proposed Rulemaking*, FCC 08-278, released December 23, 2008.