

EXHIBIT 21
(Section I, Question 8)

NBC Telemundo License Co. ("Telemundo"), the licensee of Telemundo affiliate KHRR(TV)/-DT, Tucson, Arizona (the "Station"), is requesting special temporary authority to continue to operate its existing digital television facilities on Channel 42, which is the Station's pre-transition channel, for 60 days following the target date of February 17, 2009 for the digital transition – or until **April 18, 2009**. See FCC File No. BLCDDT-20060711ABJ.

The Station has a different post-transition channel – Channel 40 – than its pre-transition channel – Channel 42. As the Commission has recognized, this class of stations merits special considerations as to the timing of their final digital rollout. See *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Review*, Report and Order, MB Docket No. 07-91, at ¶ 92 (released Dec. 31, 2007) ("*Third Periodic Order*"). Moreover, the Station, which is not a top-four network affiliate, qualifies as a small-market station eligible for special regulatory relief pursuant to the *Third Periodic Order*. See *id.* at ¶ 97 (addressing Small-Market Stations); *Broadcasting & Cable Yearbook 2008* at B-223.

As a Small-Market Station, the Station seeks the requested STA in order to facilitate a smooth transition to digital for the Station and its viewers. The Station's post-transition digital channel is identical to its current analog channel. The construction necessary pursuant to the Station's digital construction permit to complete the Station's post-transition channel will disrupt its viewers' analog reception of the Station's Spanish-language programming, which in turn would be likely to adversely affect this important audience's successful transition to digital television. See FCC File No. BPCDDT- 20080317AFA.

The proposed STA will enable completion of the Station's post-transition channel without unnecessary disruption to the Station's Spanish-speaking viewers. Telemundo also notes that Appendix B of the Commission's Seventh Report and Order in MB Docket No. 07-138 does not list any full-service television stations in Arizona that are to be using channel 42 (or adjacent channels 41 and 43) post-transition. In addition to limiting the burden on the Station's audiences and the technical reasons for the requested STA, the proposed STA will serve the public interest by facilitating a smooth digital transition for the Station and "by freeing scarce transition resources" for other stations. Cf. *Third Periodic Order* at ¶ 92.

The Station intends to commence digital operations on its post-transition channel promptly following the termination of its analog service as of February 17, 2009, and so requests only 60 days to continue digital broadcasts on Channel 42 in order to complete any necessary construction.