

KATV, LLC
KATV-DT, Little Rock, Arkansas
August 2006

EXHIBIT 21

EXPLANATION OF REQUEST FOR SPECIAL TEMPORARY AUTHORITY

KATV, LLC (“KATV”), licensee of KATV(TV), NTSC Channel 7/DTV Channel 22, Little Rock, Arkansas, hereby requests immediate action on the instant modified request for special temporary authority (“STA”) that will allow it to increase its DTV power from 10 kW to 750 kW, provide DTV service to 390,000 more people inside the noise limited contour of its certified DTV facilities without creating additional tower structure/safety problems. Action on this modified DTV STA is needed now to allow KATV to begin providing this virtually maximized DTV service while maintaining its current analog service. The technical details of the modified STA proposal and additional background on the tower issues are set forth in the Engineering Statement filed with this STA request.

KATV has a maximized DTV construction permit to operate from its current analog transmission site with an ERP of 750 kW and an HAAT of 574 meters (1883 feet). *See* FCC File No. BPCDT-19991027ABF. KATV certified on Form 381 that it would build-out these facilities (or the equivalent thereof) on its post-transition DTV channel. *See* FCC File No. BCERCT - 20041105AWQ. On June 8, 2005, the Commission issued to KATV a tentative channel 22 designation for its post-transition DTV operations.¹ Following that designation and pursuant to the interference protection deadlines adopted by the FCC in the *Second DTV Periodic Order*, KATV was required to build-out its maximized DTV facility by July 1, 2005 because channel 22 is its DTV channel.²

KATV’s filed a request for a waiver of the July 1, 2005 interference protection deadline noting that despite substantial efforts to strengthen its 1859 foot broadcast tower, the tower was at or very close to its windload capacity.³ As a result, KATV devised a unique technical proposal that would remove KATV’s top-mounted, analog antenna and replace it with a combined channel 7/channel 22 antenna. This configuration was designed to allow KATV to operate its maximized DTV facility and maintain its full-power analog operation without increasing the windloading on the tower.

After filing its initial waiver request, KATV began the full-power DTV build-out. It purchased the transmitter and the combiner for the proposed channel 7/22 operation and was in the final stages of the antenna design/selection when it encountered difficulties finding a tower crew that would remove its 36,000-pound analog antenna. The removal of KATV’s top-mounted, channel 7 analog antenna was made even more complicated by the KETS channel 2, analog antenna mounted immediately below the channel 7 antenna. KATV ultimately learned

¹ Public Notice, “*DTV Tentative Channel Designations for 1,554 Stations Participating in the First Round of DTV Channel Elections*,” DA 05-1743, released June 23, 2005 & Accompanying Table.

² *See Second DTV Periodic Order*, ¶ 78

³ The overall height of KATV’s tower with the top-mounted analog antenna is approximately 2,000 feet.

that its analog antenna could be safely removed only by helicopter and that there was just one helicopter in the entire country capable of handling the 36,000 pound analog antenna. The cost to use this helicopter for the removal/installation was approximately \$1 million.

On top of this extraordinary expense, KATV also became concerned about the structural integrity of its tower. During a strong wind storm in March of this year, the tower began flexing so much that KATV was forced to evacuate its transmitter building. This combination of events lead KATV to reconsider its proposal to install a combined channel 7/22 antenna on the top of its tower.

KATV has since changed tower consultants and stabilized its tower by adjusting its guy-wires. Its new tower consultant determined that KATV could safely side-mount a maximized, DTV-only, channel 22 antenna on the tower and add feedline to accommodate the authorized ERPs of both its analog and digital operations, provided that KATV's analog feedline currently on the tower was removed. Under this proposal, KATV's DTV antenna will remain side-mounted until the transition ends when it will replace the top-mounted, analog antenna. The instant DTV STA request follows the tower consultant's advice.

KATV estimates that it can complete construction and commence the proposed 750 kW ERP operation by the end of September 2006. KATV completed the necessary modifications to its transmitter building for the new DTV transmission equipment. Its new combiner is in the transmitter building and the new DTV transmitter and feed line are on site.

KATV submits that its amended request for a modified DTV STA is decidedly in the public interest and should be granted. The proposed, modified STA will enable KATV to enhance significantly its DTV service -- increasing its ERP by a factor of 75 (10 kW to 750 kW) and providing DTV service to 97.5 percent of the population predicted to receive service from KATV's certified DTV facilities -- without making its existing tower structurally unsafe. This enhanced DTV service from the modified STA will enable KATV to provide ABC digital programming, including the many hours of HD programming the network now provides, to 390,000 more people in the Little Rock market. For all these reasons, KATV requests that the Commission grant its request for a modified DTV STA.

KATV recognizes that the Commission has yet to act on its pending request for an interference protection deadline waiver. KATV nonetheless requests immediate action on its modified STA proposal so that it can provide improved DTV service as soon as possible. KATV recognizes that any action taken on the modified STA request will be without prejudice to the Commission's decision on its pending interference protection waiver request. To the extent this request for immediate action on the modified STA request departs from the Commission's standard repacking procedures, KATV submits that the 390,000 increase in population that will receive DTV service justifies the requested action.