

**Journal Broadcast Corporation  
Request for Special Temporary Authority  
July 2009**

**Request for Special Temporary Authority**

Journal Broadcast Corporation (“Journal”), licensee of translator station K16EO, Oro Valley/Tucson, Arizona (Fac. ID No. 36915), hereby requests special temporary authority (“STA”) to flash-cut K16EO to digital operation.

K16EO operates as a translator station rebroadcasting station KGUN-TV, Tucson, Arizona (Fac. ID No. 36918), also licensed to Journal. KGUN-TV currently broadcasts ABC network programming on digital channel 9. On June 12, 2009, KGUN-TV transitioned its digital operations from its pre-transition UHF channel 35 to its post-transition VHF facilities on channel 9.

Subsequent to the transition of its digital operations to VHF channel 9, KGUN-TV has been contacted by more than eight hundred viewers across the Tucson metropolitan area who no longer receive over-the-air broadcast service of KGUN-TV. KGUN-TV has worked with these viewers, many of whom rely on indoor antennas, in an attempt to restore broadcast service. These efforts have included instructing viewers how to double re-scan their digital tuners and on the proper use of indoor VHF antennas. However, these efforts have failed to restore KGUN-TV’s broadcast services to many viewers widely spread across the station’s market.

KGUN-TV continues to actively work to resolve these VHF reception issues. One such effort to try to restore broadcast service to some of KGUN-TV’s viewers, is Journal’s acceleration of its effort to initiate digital operation on K16EO by filing a digital flash cut application, which remains pending. *See* BDFCDTT-20090624AEA.

Journal hereby requests STA to initiate digital operation on K16EO consistent with the parameters specified that station’s flash cut application while the application remains pending. Such STA will allow K16EO to more quickly initiate translated digital broadcast service of KGUN-TV in an attempt to restore over-the-air service to at least some of the Tucson-area viewers that are no longer able to receive KGUN-TV’s broadcast service.

As demonstrated in this request and the pending flash cut application, K16EO’s proposed operation is not predicted to create prohibited interference to any station in either the United States or Mexico.

Rapid restoration of KGUN-TV’s digital broadcast service via K16EO to at least some viewers in the Tucson market would further the public interest and Journal respectfully asks that the Commission grant this request for STA.