

**Exhibit 21****Extraordinary Circumstances Requiring Special Temporary Authority**

In the initial Table of Allotments, KNWS-TV<sup>1</sup> was assigned an out-of-core digital channel, Channel 52. Johnson Broadcasting, the licensee of KNWS-TV, also operates KLDT at Lake Dallas TX, and KLDT<sup>2</sup> was also assigned an out-of-core digital channel, Channel 54. Johnson Broadcasting has constructed digital transmitting facilities on both of these out-of-core channels, but now must cease broadcasting on them as of the ending date of transition.

During the channel election process, KNWS-DT entered into a Negotiated Channel Agreement with KTMD-DT<sup>3</sup> at Galveston, TX. The agreement allows KNWS-DT to use the present KTMD analog channel, Channel 47, after transition is complete. Because this is first adjacent to the KTMD-DT digital channel, Channel 48, the agreement requests KNWS-DT to co-locate with KTMD-DT and sets forth stringent interference requirements if KNWS-DT chooses an alternate location.

Understandably, KTMD desires to operate its analog facility until the end of transition. Once transition ends, the KTMD analog facility will need to be dismantled and removed, and the new KNWS-DT digital facility for Channel 47 will need to be installed and connected to the KTMD antenna system. All of this will require time and resources when both will be in short supply since Johnson Broadcasting will be required to execute a similar process for its Lake Dallas facility as well.

The Commission has made provisions for some digital stations whose pre-transition channel is different than their post-transition channel to continue operation on their pre-transition channel while construction is completed for the final post-transition facility. This provision is designed to address the very challenges KNWS-DT is facing in moving to the KTMD site. However, operating on the pre-transition channel is not an option for KNWS-DT since by statute it must cease broadcasting on its out-of-core channel in any mode at the end of transition.

Therefore, Johnson Broadcasting requests Special Temporary Authority to operate KNWS-DT with the parameters listed in this informal application. The specified facilities will allow KNWS-DT to operate on its post-transition, in-core channel at reduced power and meet the interference requirements of its Negotiated Channel Agreement with KTMD-DT. The proposed temporary facility will use an existing KNWS-DT antenna and feedline that were used for an earlier digital STA on Channel 52 at the KNWS-TV analog site. This provides some reduction of the Johnson Broadcasting financial burden of having to build both out-of-core and in-core facilities for its two stations.

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<sup>1</sup> Facility ID Number 31870

<sup>2</sup> Facility ID Number 17433

<sup>3</sup> Facility ID Number 64984

While the coverage area is reduced from the full Appendix B facility, the requested KNWS-DT system will provide interference free service to 89 percent<sup>4</sup> of the population listed in Appendix B. This exceeds the 85 percent threshold set by the Commission. The public interest will be served by allowing the vast majority of people within the market to continue to receive service from KNWS-DT on the new, in-core channel while construction on the maximized facility at the KTMD-DT site is completed. Without temporary authority to operate on its in-core channel, KNWS-DT will be forced to “go dark” and the public will be deprived of a digital service.

A contour map is attached showing the “service” and “city grade” contours for the proposed STA facility. The city grade contour completely encompasses the city of license, Katy, TX. These contours are shown with blue lines. Also shown on the map is the service contour for the full KNWS-DT Appendix B facility. An application<sup>5</sup> for this facility was granted September 10, 2008.

As noted above, both of Johnson Broadcasting’s pre-transition channels are out-of-core. Johnson Broadcasting has already built two digital facilities, and now it faces the additional strain and expense of rebuilding both facilities on in-core channels that cannot be used until the end of transition. Because of the unique and extenuating circumstances, Johnson Broadcasting requests authority to use these temporary KNWS-DT facilities for at least 6 months.

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<sup>4</sup> This number is based on an incoming interference study made with Probe 3™ software using the USGS 03 second digitized terrain database, a 2 km study grid and a 1 km terrain profile increment, which is believed to parallel the FCC default values. Interference free population was 4,306,426.

<sup>5</sup> File No. BPCDT-20080619AFI

**KNWS-DT**

BPCDT20080619AFI  
Katy TX  
Latitude: 29-34-15 N  
Longitude: 095-30-37 W  
ERP: 1000.00 kW  
HAAT: 597.1 m  
Channel: 47  
Frequency: 671.0 MHz  
AMSL Height: 616.2 m  
Elevation: 23.4 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 1.5

**KNWS-DT-ST47**

Proposed  
Katy TX  
Latitude: 29-33-40 N  
Longitude: 095-30-04 W  
ERP: 89.10 kW  
HAAT: 308.0 m  
Channel: 47  
Frequency: 671.0 MHz  
AMSL Height: 326.8 m  
Elevation: 22.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 0.4

**Digital Service Contours  
Channel 47  
KNWS-DT - Katy, TX**

