WBNS-TV, Inc.
WBNS-DT, Columbus, Ohio
Section III-D, Question 11
June 2008

Exhibit 44

WBNS-TV, Inc. ("WBNS") hereby submits this exhibit to address the instances in which its proposed maximized operation does not comply with the Commission's post transition interference protection requirements. As demonstrated in the attached table, the proposed WBNS-DT maximized operation is predicted to cause incremental interference in excess of 0.5 percent to three stations: WDEM-LP, Channel 17, Columbus, Ohio (2.37 percent); WCLL-LP, Channel 19, Columbus, Ohio (2.90 percent); and WUPX-DT, Channel 21, Moorehead, Kentucky (0.66 percent);

The interference conflict with Station WCLL-LP is immediately eliminated because when existing analog masking interference is considered, the predicted interference from the proposed WBNS-DT operation is reduced to zero.

The excess predicted interference to WDEM-LP almost certainly is the result of a flaw in the OET 69 processing software code that predicts interference that does not actually exist. The problem occurs because the code assumes that within one kilometer of the undesired transmitter site the antenna used by the undesired station has an elevation pattern relative field factor of 1.000 regardless of depression angles actually deployed in the antenna. Of course, the very thought that a station would ever deploy an antenna with an elevation pattern of 1.000 within one kilometer of its tower is preposterous.

While this processing code error is well-known by the Commission and the industry, the Commission has rebuffed all requests to correct this plain error in its software.

Given this background, WBNS will either secure an agreement with WDEM-LP to accept the non-existent interference or amend the application seeking a waiver of the 0.5 percent de minimis interference rule.

Finally, WBNS will either (i) secure an interference agreement with WUPX to accept the small amount of predicted interference (0.16 percent) over the 0.50 percent standard, (ii) file a waiver of the de minimis interference rule or (iii) amend the instant proposal to eliminate the excess interference.

COHEN, DIPPELL AND EVERIST, P.C.

LONGLEY-RICE INTERFERENCE ANALYSIS
FOR THE PROPOSED OPERATION
ABOVE ITS ALLOTTED APPENDIX B FACILITIES AND
IN RELATION TO OTHER ALLOTTED APPENDIX B FACILITIES
AND OTHER POTENTIALLY AFFECTED STATIONS IN CDBS
WBNS-DT, COLUMBUS, OHIO
CHANNEL 21 1700 KW ND ERP 279 METERS HAAT
JUNE 2008

Channel	Call	City/State	Dist(km)	Status	FCC File No.	Result
17	WDEM-LP	COLUMBUS OH	0	LIC	BLTTL-19880830ID	2.37%*
19	WCLL-LP	COLUMBUS OH	2.4	LIC	BLTTL-19990802JG	2.90%**
21	WFYI-DT	INDIANAPOLIS IN	270.5	ALLOT		0.04%
21	WFYI-DT	INDIANAPOLIS IN	270.5	LIC	BLEDT-20030310BAD	0.04%
21	WUPX-DT	MOREHEAD KY	235.3	LIC	BLCDT-20040901ACJ	0.66%
21	WUPX-DT	MOREHEAD KY	235.3	ALLOT		0.66%
21	WDWB-DT	DETROIT MI	275.6	LIC	BLCDT-20040524AOG	0.01%
21	WMYD-DT	DETROIT MI	275.6	ALLOT		0.01%
21	WVPY-DT	FRONT ROYAL VA	418.3	ALLOT		no interference
21	WVPY-DT	FRONT ROYAL VA	418.3	LIC	BLEDT-20021220ADZ	no interference
22	WBKA-LP	BUCYRUS OH	95.5	LIC	BLTTL-19890227IQ	no interference
28	WVTX-CA	BRIDGEPORT OH	193.3	APP	BMPTTA-20050510ABL	0.00%
28	WVTX-CA	BRIDGEPORT OH	194	LIC	BLTTA-20050919ABE	0.00%

* Interference predicted considering only post-transition DTV masking. However, inclusion of existing masking from stations in CDBS consistent with current FCC policy decreases predicts 2.68% interference.

** Interference predicted considering only post-transition DTV masking. However, inclusion of existing masking from stations in CDBS consistent with current FCC policy decreases predicted interference to 0.00%.