Exhibit 44 – Statement A

NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
WWBT, Inc.
WWBT(TV) Richmond, Virginia
Facility ID: 30833
Ch. 12 5.65 kW 241 m

WWBT, Inc. ("WWBTI") is the licensee of analog television station WWBT(TV), Channel 12, Richmond, Virginia (see BMLCT-20050930BOW). *WWBTI* herein respectfully requests authorization to construct its post-transition facility for WWBT in accordance the "Filing Freeze Waiver" policy in the Commission's Third Periodic Review[1]. The proposed facility will, of necessity, extend the noise-limited Appendix B[2] service contour due to the limitations imposed by the allotment's limitations[3]. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 12 and pre-transition digital operations on Channel 54.

The location proposed for WWBT's post-transition facility is the currently authorized WWBT(TV) site. The tower is registered with the FCC, Antenna Structure Registration Number 1015246. *WWBTI* will employ the currently authorized analog Channel 12 non-directional antenna for the proposed WWBT post-transition digital facility. The antenna is a Dielectric TW-12B12-R which is considered non-directional in the horizontal plane with 0.75° of electrical beam tilt.

Exhibit 44-Figure 1 provides a map depicting the service contour of the proposed facility. Also depicted on the map is the service contour for the Appendix B facility along with the "5 mile" extension of that contour. The existing analog Grade B contour is also shown. As demonstrated on the map, the proposed facility will not achieve replication of the Grade B contour nor does it extend past the "5 mile" extension of the Appendix B service contour. The only limitation is the Commission imposed 0.5% new interference limit. **Exhibit 44-Table I**

[1] See paragraphs 151 and 152, *Report and Order*, Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television, MB Docket No. 07-91, FCC 07-228, Released December 31, 2007.
[2] See *Seventh Report And Order And Eighth Further Notice Of Proposed Rule Making*, Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service, MB Docket No. 87-268, FCC 07-138, released August 6, 2007.
[3] A coverage footprint compatible with the authorized analog Grade B contour is not possible due to limitations imposed on WWBT by an out-of-core pre-transition allotment on Ch. 54 limited to a maximum ERP of 1000 kW.

provides the results of the interference study. As demonstrated thereon, the proposed facility complies with the Commission stated "Filing Freeze Waiver" policy.

Exhibit 44-Figure 1 also provides the proposed facility's principal community coverage contour. As demonstrated therein, the principal community of Richmond, Virginia is predicted to receive the enhanced signal level as required in §73.625(c) of the Commission's Rules.

The proposed WWBT site is located more than 400 km from the nearest points on the Canadian and Mexican borders and does not require international coordination. The nearest FCC monitoring station is at Laurel, MD, at a distance of 193.5 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the area specified in §73.1030(a)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, is not required. There are two non-directional AM broadcast stations[4] located 0.98 km from the proposed site according to the Commission's engineering database. This distance exceeds the minimum distance in §73.1692 that would suggest consideration of the two AM stations. There are no directional AM stations within 3.2 km of the proposed site. Further, the instant proposal specifies the use of the existing installed WWBT antenna. Thus, no tower construction is required to accomplish implementation of the proposed digital facility.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.

[4] WLES(AM), 580 kHz, Bon Air, Virginia, and WXGI(AM), 950 kHz, Richmond, Virginia.

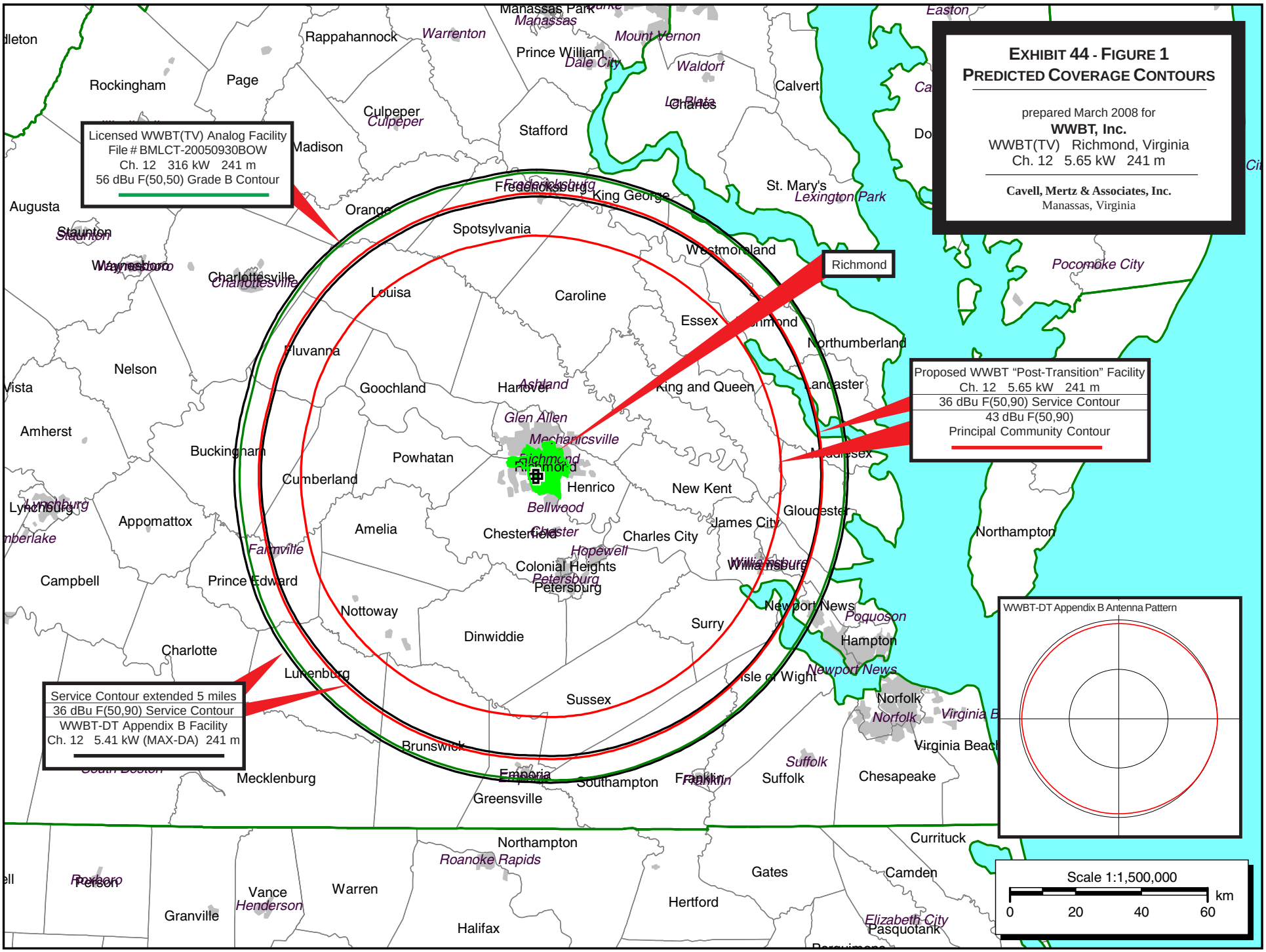
EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS
prepared March 2008 for
WWBT, Inc.
WWBT(TV) Richmond, Virginia
Ch. 12 5.65 kW 241 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Licensed WWBT(TV) Analog Facility
File # BMLCT-20050930BOW
Ch. 12 316 kW 241 m
56 dBu F(50,50) Grade B Contour
Richmond
Proposed WWBT "Post-Transition" Facility
Ch. 12 5.65 kW 241 m
36 dBu F(50,90) Service Contour
43 dBu F(50,90)
Principal Community Contour
Service Contour extended 5 miles
36 dBu F(50,90) Service Contour
WWBT-DT Appendix B Facility
Ch. 12 5.41 kW (MAX-DA) 241 m
WWBT-DT Appendix B Antenna Pattern
Scale 1:1,500,000
0 20 40 60 km
Rockingham
Page
Rappahannock
Warrenton
Manassas Park
Manassas
Prince William
Dale City
Mount Vernon
Waldorf
Calvert
Culpeper
Madison
Stafford
Fredericksburg
King George
St. Mary's
Lexington Park
Augusta
Staunton
Orange
Spotsylvania
Westmoreland
Pocomoke City
Charlottesville
Louisa
Caroline
Essex
Northumberland
Fluvanna
Nelson
Goochland
Hanover
Ashland
King and Queen
Lancaster
Amherst
Glen Allen
Mechanicsville
Buckingham
Powhatan
Richmond
Cumberland
Henrico
New Kent
Bellwood
Appomattox
Amelia
Chesterfield
Chester
Charles City
James City
Gloucester
Northampton
Farmville
Hopewell
Colonial Heights
Petersburg
Williamsburg
Campbell
Prince Edward
Nottoway
Surry
Newport News
Poquoson
Dinwiddie
Hampton
Charlotte
Lunenburg
Isle of Wight
Sussex
Norfolk
Virginia Beach
Brunswick
Suffolk
Chesapeake
Mecklenburg
Emporia
Southampton
Franklin
Greensville
Currituck
Northampton
Roanoke Rapids
Gates
Camden
Person
Vance
Warren
Granville
Henderson
Hertford
Halifax
Elizabeth City
Pasquotank

Exhibit 44 – Table I

INTERFERENCE STUDY RESULTS

prepared for

WWBT, Inc.

WWBT(TV) Richmond, Virginia

Facility ID: 30833

Ch. 12 5.65 kW 241 m

Channel	Affected Station	City	State	7th R&O Table Baseline (2000 Census)	Calculated Baseline (2000 Census)	Interference Population 7th R&O facility (2000 Census)	Interference Population with Proposal (2000 Census)	Population Difference	New Interference
11	WBAL-TV	Baltimore	MD	6,953,000		- - -No interference - - -			
11	WTVD	Durham	NC	2,807,000		- - -No interference - - -			
11	WVPT	Staunton	VA	552,000		- - -No interference - - -			
12	WHYY-TV	Wilmington	DE	7,752,000		- - -No interference - - -			
12	WCTI	New Bern	NC	1,324,000	1,324,921	40,124	40,124	0	0.00%
12	WBOY-TV	Clarksburg	WV	585,000		- - -No interference - - -			
12	WWPX-TV	Martinsburg	WV	2,480,000	2,480,713	163,980	168,027	4,047	0.16%
13	WJZ-TV	Baltimore	MD	7,452,000		- - -No interference - - -			
13	WVEC-TV	Hampton	VA	1,937,000	1,937,361	21,580	26,262	4,682	0.24%
13	WSET-TV	Lynchburn	VA	1,169,000		- - -No interference - - -			