

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Pacific And Southern Company, Inc.
WTSP(TV) St. Petersburg, Florida
Facility ID: 11290
Ch. 10 17.9 kW (MAX-DA) 457 m

Pacific And Southern Company, Inc. (“P&S”) is the licensee of analog television station WTSP(TV), Channel 10, St. Petersburg, Florida. *P&S* herein respectfully requests authorization to construct its post-transition facility for WTSP(TV) in accordance the “Filing Freeze Waiver” policy in the Commission’s Third Periodic Review¹. The proposed facility will, of necessity, extend the noise-limited Appendix B² service contour. *P&S* proposes to locate its post-transition facility for WTSP(TV) at the existing Channel 10 analog site and to employ the existing, installed Channel 10 directional antenna³. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 10 and pre-transition digital operations on Channel 24.

The location proposed for WTSP(TV)’s post-transition facility is the currently authorized WTSP(TV) analog site. The tower is registered with the FCC, Antenna Structure Registration Number 1027755. *P&S* will employ the currently authorized analog Channel 10 directional antenna for the proposed WTSP(TV) post-transition digital facility. The antenna is a Dielectric THV-11A10 C150 which is considered directional in the horizontal plane with 0.75° of electrical beam tilt. The customary directional antenna polar plot has not been provided since information regarding this antenna was previously provided in the construction permit application for the current Channel 10 facility⁴. The antenna was subsequently assigned Antenna ID 67949 by Commission Staff. A tabulation of the antenna azimuth pattern relative field data is provided in “Tech-Box” 10e of FCC Form 301.

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 *Memorandum Opinion And Order On Reconsideration Of The Seventh Report And Order And Eighth Report And Order, In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 08-72, released March 6, 2008.

³ *P&S* constructed the facility authorized in the construction permit, BPCT-20041025ADK, and filed a license application in June 2007, see BLCT-20070629ABH.

⁴ See BPCT-20041025ADK

In October 2007, *P&S* through its parent corporation *Gannett* filed a *Petition for Reconsideration of the Seventh Report and Order*⁵ Appendix B facility for WTSP(TV). The petition described how *P&S* had replaced its Channel 10 antenna and filed a license application to cover the construction permit. It should be noted that antenna azimuth pattern authorized in the construction permit differs from that of the old antenna that was removed from service. Accordingly, a change in the Appendix B facility specification was requested to more closely match the azimuth pattern of the installed antenna. The Commission granted the request⁶. However, the old antenna's azimuth pattern (the pre-2004 antenna pattern that was current in 1997) was employed by Commission Staff as a template for replication of the Grade B contour. Thus, even though the Commission subsequently in 2004 authorized a larger coverage footprint for WTSP(TV) with a new antenna and different antenna pattern, the pre-2004 antenna pattern with more suppression to the West was employed for the Appendix B facility.

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 facility⁷ along with the “5 mile” extension of that contour. The analog Grade B contour is shown using the pre-2004 licensed facility with its associated antenna pattern⁸ (solid green line) as well as the Grade B contour for the new, as built antenna (dashed green line). As demonstrated on the map, the proposed facility comes as close as possible to achieving replication of the Grade B contour over land areas using the existing, installed WTSP(TV) Channel 10 directional antenna. Further, the service contour for the proposed digital facility does not extend past the “5 mile” extension of the Appendix B service contour except over a small, uninhabited area in the Gulf of Mexico. If the Appendix B pattern had been based on the 2004 authorization, which has been constructed and for which a license application is pending, there would be no contour extension beyond that permitted by the “Filing Freeze Waiver” policy.

In accordance with the “Filing Freeze Waiver” policy, **Exhibit 44-Table I** provides the results of the required interference study. As demonstrated therein, the proposed facility

⁵ 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.

⁶ See Footnote 3 at Appendix D3, Page 104.

⁷ In **Exhibit 44-Figure 1**, the Appendix B service contour (solid black line) is covered by the pre-2004 analog Grade B contour (solid green line).

⁸ See BLCT-19910624KG

complies with the Commission's stated "Filing Freeze Waiver" policy in that it does not create new interference in excess of the stated 0.5% limit. In fact, there is a slight reduction in predicted interference to WJXX(TV)⁹. P&S respectfully requests that the Commission staff permit the small extension of the proposed facility's service contour over water. If a waiver of the Commission's Rules and policies is required, then one is requested on behalf of the applicant.

Exhibit 44-Figure 1 also provides the proposed facility's principal community coverage contour. As demonstrated therein, the principal community of St. Petersburg, Florida is predicted to receive the enhanced signal level as required in §73.625(c) of the Commission's Rules. The proposed facility is predicted to cover an interference free population of 3,453,575 persons. This exceeds the Appendix B population of 3,447,000 persons.

The proposed WTSP(TV) 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 Vero Beach, Florida, at a distance of 218.9 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 no AM broadcast stations located within 3.2 km from the proposed site according to the Commission's engineering database.

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

⁹ An additional interference study was performed using the old antenna's azimuth pattern. As expected, the predicted interference populations were identical to that of the Appendix B facility.

Proposed WTSP(TV) "Post-Transition" Facility
 Ch. 10 17.9 kW (MAX-DA) 457 m
 36 dBu F(50,90) Service Contour
 43 dBu F(50,90)
 Principal Community Contour

WTSP(TV) Appendix B Facility
 Ch. 10 18.1 kW (MAX-DA) 458 m
 Service Contour extended 5 miles
 36 dBu F(50,90) Service Contour

WTSP(TV) (CP) Analog Facility
 File # BPCT-20041025ADK
 Ch. 10 316 kW 457 m
 56 dBu F(50,50) Grade B Contour

Licensed WTSP(TV) Analog Facility
 File # BLCT-19910624KG
 Ch. 10 316 kW 458 m
 56 dBu F(50,50) Grade B Contour

EXHIBIT 44 - FIGURE 1 **PREDICTED COVERAGE CONTOURS**

prepared April 2008 for
Pacific and Southern Company, Inc.
 WTSP(TV) St. Petersburg, Florida
 Ch. 10 17.9 kW (MAX-DA) 457 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

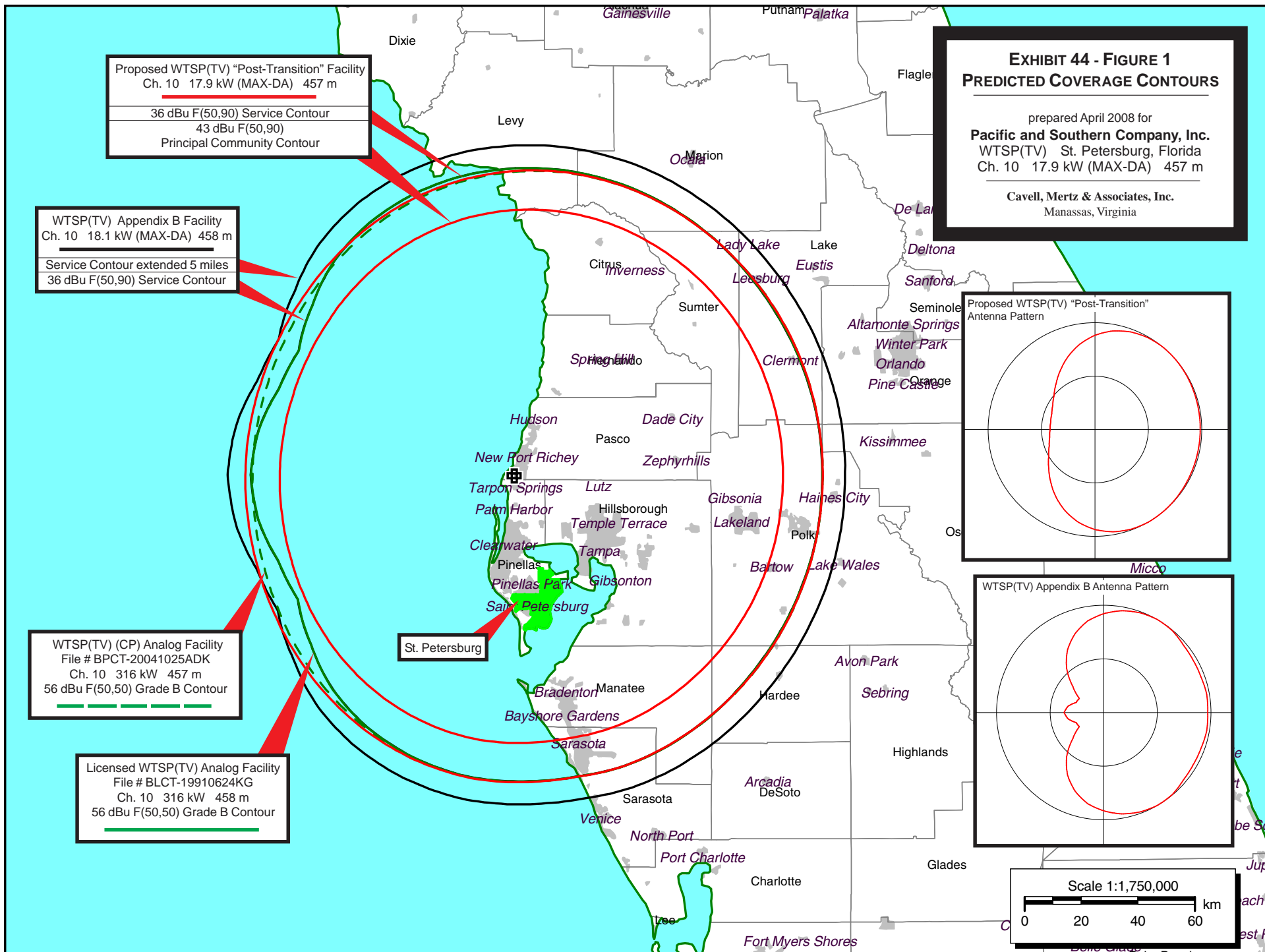
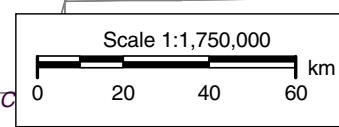
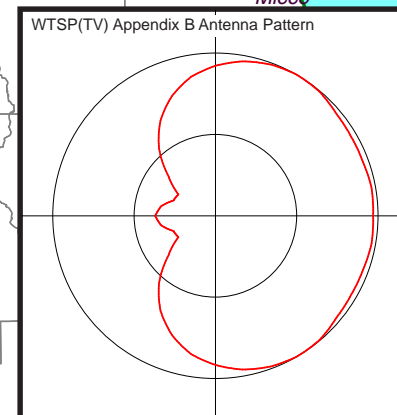
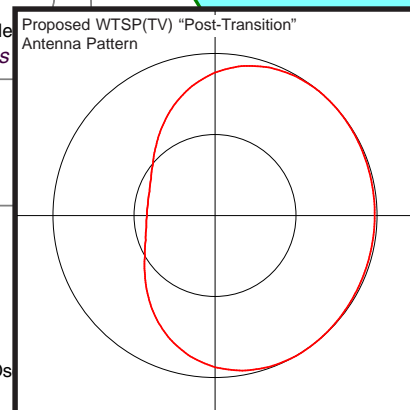


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS
 prepared for
Pacific And Southern Company, Inc.
 WTSP(TV) St. Petersburg, Florida
 Facility ID: 11290
 Ch. 10 17.9 kW (MAX-DA) 457 m

<u>Channel</u>	<u>Affected Station</u>	<u>City</u>	<u>State</u>	<u>7th R&O Table Baseline (2000 Census)</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population 7th R&O facility (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>Population Difference</u>	<u>New Interference</u>
9	WINK-TV	Fort Myers	FL	1,532,000			- - -No interference - - -		
9	NEW	Gainesville	FL	500,000			- - -No interference - - -		
10	WPLG(TV)	Miami	FL	4,931,000			- - -No interference - - -		
10	WJXX(TV)	Orange Park	FL	1,318,000	1,318,973	11,451	11,242	-209	-0.02%
10	WALB(TV)	Albany	GA	626,000	626,610	7,730	7,730	0	0.00%
11	WESH(TV)	Daytona Beach	FL	3,125,000			- - -No interference - - -		