

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Peak Media of PA Licensee LLC
WWCP-TV Johnstown, Pennsylvania
Facility ID: 20295
Ch. 8 9.3 kW (MAX-DA) 368 m

Peak Media of PA Licensee LLC (“*Peak Media*”) is the licensee of analog television station WWCP-TV, Channel 8, Johnstown, Pennsylvania (see BLCT-19861023KJ). *Peak Media* is also currently authorized to construct the post-transition digital facility for WWCP-TV on Channel 8 (“CP”, BPCDT-20080408ABF). With the lifting of the filing freeze¹, *Peak Media* herein proposes to modify its CP to specify a maximized post-transition operation for WWCP-TV from the existing tower (see Antenna Structure Registration Number 1026534). The proposed facility will become operational following the Congressionally mandated shut down of all full service analog television stations on February 17, 2009.

Exhibit 44 - Figure 1 provides a map depicting the service contour for the proposed facility along with principal community coverage contour. As demonstrated therein, the principal community of Johnstown, Pennsylvania is predicted to receive the enhanced signal level as required in §73.625(a) of the Commission’s Rules. The proposed facility is predicted to provide interference free service to 2,612,721 persons, which is 103.0 percent of the 2,536,000 persons that are predicted to receive interference free service from the Appendix B facility².

The proposed antenna is a RCA THP-SP26-6-1R(8) which is directional in the horizontal plane and is horizontally polarized with 0.6° of electrical beam tilt. The relative field pattern data has been entered into FCC Form 301, Section III-D, Question 10e. In addition, a plot of the horizontal plane (azimuth) relative field pattern is provided in the attached **Exhibit 44 - Figure 2**.

Since the proposed facility extends the service contour past that currently authorized for the Appendix B facility, post-transition interference studies were performed in accordance with the methods set forth in the Commission’s OET Bulletin No 69 (“OET-69”). The results of the studies

¹ See *Public Notice, Commission Lifts The Freeze On The Filing Of Maximization Applications And Petitions For Digital Channel Substitutions, Effective Immediately*, DA 08-1213, Released May 30, 2008.

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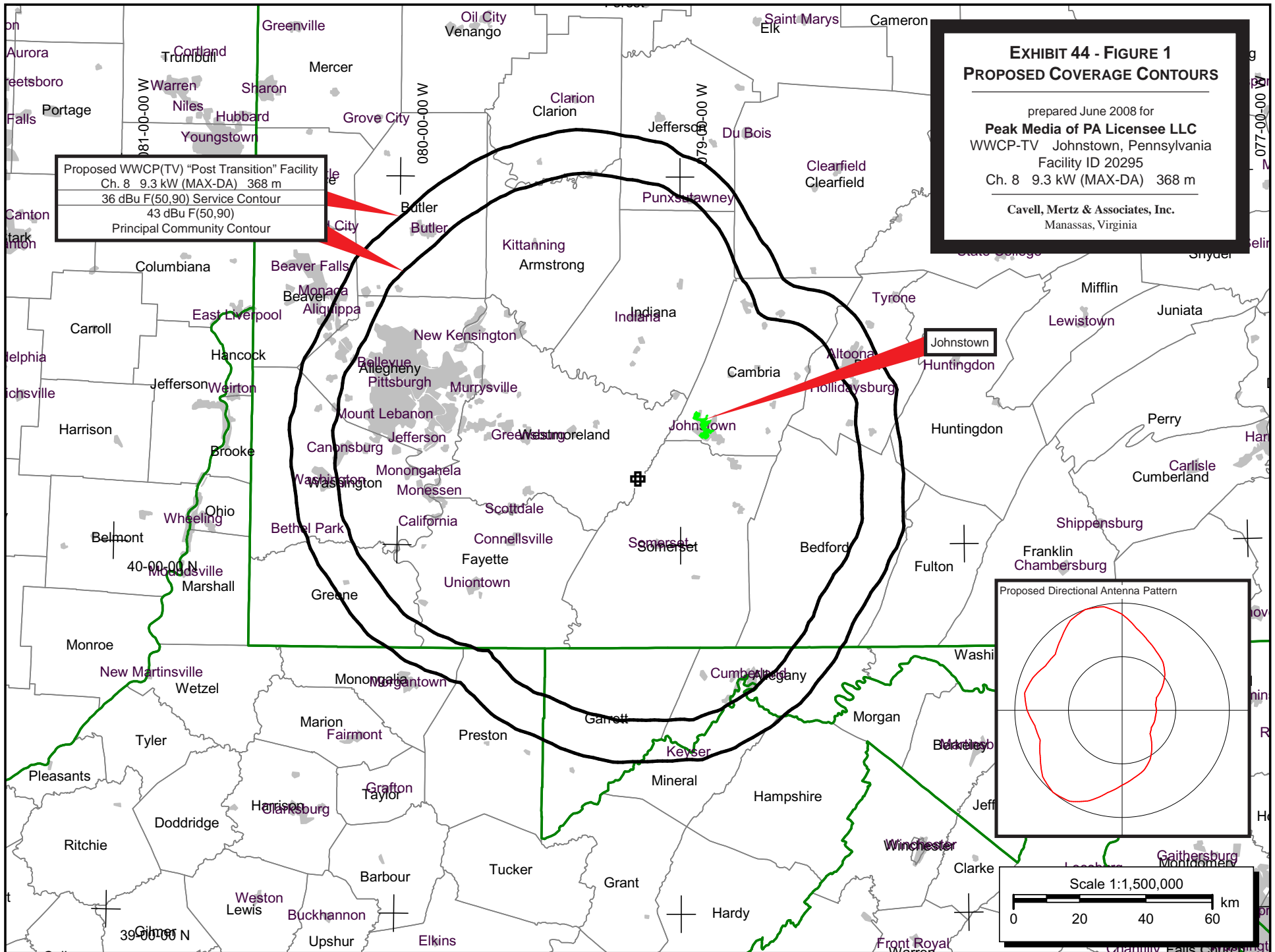
indicate that no new interference in excess of the 0.5% limit established in the Commission's Third Periodic Review³ is caused to affected stations by the post-transition WWCP-TV operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**.

The proposed WWCP-TV digital Channel 8 site is located less than 400 km from the nearest point on the international border with Canada. Thus, international coordination is respectfully requested. The nearest FCC monitoring station is Laurel, MD at a distance of 230 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. There are no AM stations located within 3.2 km of the existing tower site.

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

² See *Memorandum Opinion And Order On Reconsideration of the Seventh Report and Order and Eighth Report And Order, Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, FCC 08-72, Released March 6, 2008

³ See *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.



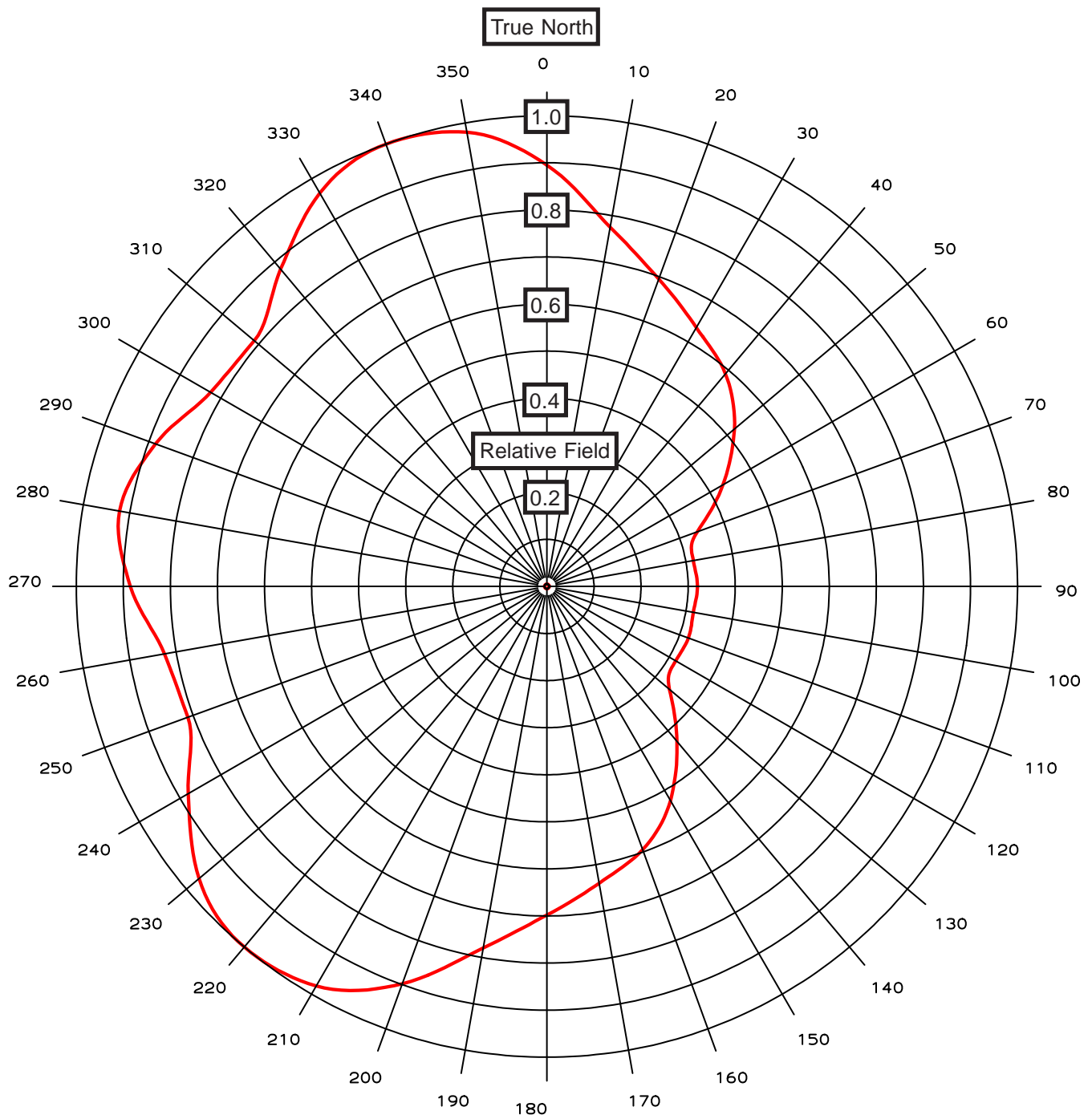


EXHIBIT 44 - FIGURE 2
ANTENNA HORIZONTAL PLANE
(AZIMUTH) RELATIVE FIELD PATTERN

prepared June 2008 for
Peak Media of PA Licensee LLC
WWCP-TV Johnstown, Pennsylvania
Facility ID 20295
Ch. 8 9.3 kW (MAX-DA) 368 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS

prepared for
Peak Media of PA Licensee LLC
 WWCP-TV Johnstown, PA
 Facility Id: 20295
 Ch. 8 9.3 kW (MAX-DA) 368 m

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</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>New Interference</u>	
								<u>Population</u>	<u>Percentage</u>
7	WJLA-TV	Washington, DC	BPCDT-20080507AAI	7,250,000			--- No Interference ---		
7	WJLA-TV	Washington, DC	Reference	7,250,000			--- No Interference ---		
7	WTRF-TV	Wheeling, WV	Reference	2,373,000	2,365,316	11,425	16,597	5,172	0.219 %
7	WTRF-TV	Wheeling, WV	BMPCDT-20080317AGD	2,373,000	2,258,196	16,728	24,927	8,199	0.363 %
8	WNJB(TV)	New Brunswick, NJ	Reference	16,912,000			--- No Interference ---		
8	WNJB(TV)	New Brunswick, NJ	BMPEDT-20000425AAM	16,912,000			--- No Interference ---		
8	WICZ-TV	Binghamton, NY	BLCDT-20060320AFC	751,000			--- No Interference ---		
8	WICZ-TV	Binghamton, NY	Reference	751,000			--- No Interference ---		
8	WJW(TV)	Cleveland, OH	BPCDT-20080311AAN	3,964,000	3,945,833	63,236	70,162	6,926	0.176 %
8	WJW(TV)	Cleveland, OH	Reference	3,964,000	3,964,924	61,719	64,712	2,993	0.076 %
8	WGCT-CA	Columbus, OH	BPTVA-20060316ACC				--- No Interference ---		
8	WGCT-CA	Columbus, OH	BLTVL-19880601IW				--- No Interference ---		
8	WLIO(TV)	Lima, OH	BMPCDT-20060517ABE	995,000			--- No Interference ---		
8	WLIO(TV)	Lima, OH	Reference	995,000			--- No Interference ---		
8	WGAL(TV)	Lancaster, PA	BPCDT-20080314ABN	4,088,000	4,237,721	161,674	165,504	3,830	0.090 %
8	WGAL(TV)	Lancaster, PA	Reference	4,088,000	4,126,111	114,471	114,524	53	0.001 %
8	WVNS-TV	Lewisburg, WV	BMPCDT-20040608ABO	590,000	591,401	8,762	8,803	41	0.007 %
8	WVNS-TV	Lewisburg, WV	Reference	590,000	591,401	8,762	8,803	41	0.007 %
9	WUSA(TV)	Washington, DC	BMPCDT-20080425ABL	7,238,000			--- No Interference ---		
9	WUSA(TV)	Washington, DC	Reference	7,238,000			--- No Interference ---		
9	WTOV-TV	Steubenville, OH	Reference	2,829,000	2,830,919	1,951	4,672	2,721	0.096 %
9	WTOV-TV	Steubenville, OH	BPCDT-20080403AAG	2,829,000	3,199,363	8,617	13,949	5,332	0.167 %