

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM

prepared for

Lincoln Broadcasting Company, A California LP

KTSF(TV) San Francisco, California

Facility ID: 37511

Ch. 27 858 kW (MAX-DA) 403.4 m

Lincoln Broadcasting Company, A California LP (“*Lincoln*”) is the licensee of analog television station KTSF(TV), Channel 26, San Francisco, California (see BLCT-2507). *Lincoln* is also currently authorized to operate its pre and post-transition digital facility for KTSF(TV) on Channel 27 (BLCDT-20050131AOD). With the lifting of the filing freeze¹, *Lincoln* herein proposes to apply for a Construction Permit to specify a maximized post-transition operation for KTSF(TV) from the existing tower (see Antenna Structure Registration Number 1010566). 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 San Francisco, California 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 6,246,241 persons, which is 102.1 percent of the 6,116,000 persons that are predicted to receive interference free service from the Appendix B facility².

The proposed antenna is a Andrew ATW15H3-HSP4-27H which is directional in the horizontal plane and is horizontally polarized with 0.75° 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

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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methods set forth in the Commission's OET Bulletin No 69 ("OET-69"). The results of the studies 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 KTSF(TV) operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**.

At the specified effective radiated power and considering the antenna azimuth pattern, the proposed KTSF facility is predicted to have a signal level of 2.37 mV/m at the Livermore monitoring station. This signal level is below that specified in Section 73.1030(c)(2) of the Commission's Rules that would trigger a coordination effort with the monitoring station. There are no AM stations located within 3.2 km of the existing tower site.

The proposed KTSF(TV) digital Channel 27 site is located more than 400 km from the nearest point on the international border with Mexico and does not require international coordination.

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.

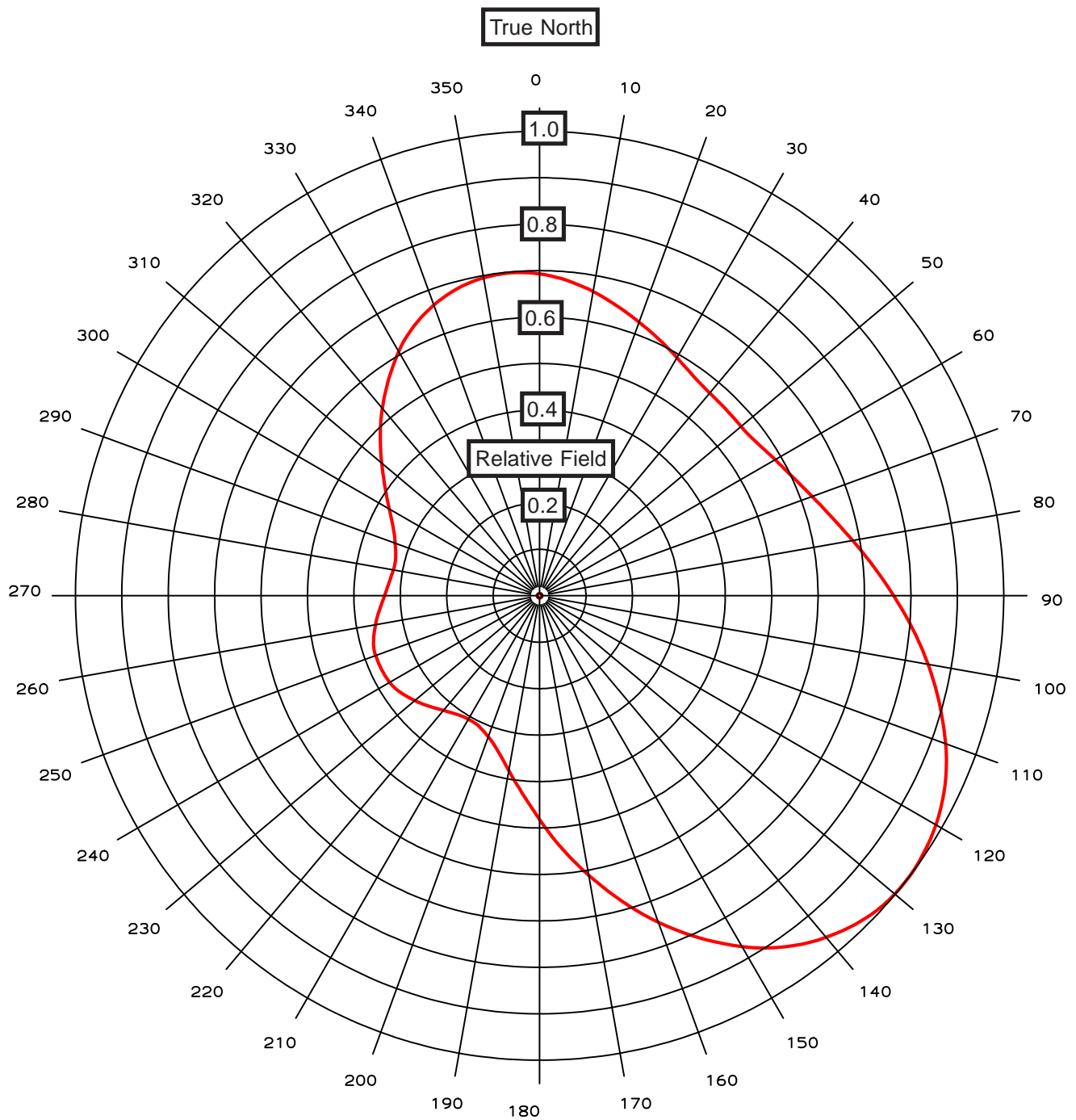


EXHIBIT 44 - FIGURE 2
ANTENNA HORIZONTAL PLANE
(AZIMUTH) RELATIVE FIELD PATTERN

prepared June 2008 for
Lincoln Broadcasting Company,
A California LP
KTSF(TV) San Francisco, California
Facility ID 37511
Ch. 27 858 kW (MAX-DA) 403.4 m

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Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS
 prepared for
Lincoln Broadcasting Company, A California LP
 KTSF(TV) San Francisco, CA
 Facility Id: 37511
 Ch. 27 858 kW (MAX-DA) 403.4 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>
23	KEZT-CA	Sacramento, CA	BLTTTL-19970918JA				--- No Interference ---		
26	KTFK-TV	Stockton, CA	BPCDT-20080317AGF	4,135,000	4,135,594	210,691	210,691	0	0.000 %
26	KTFK-TV	Stockton, CA	Reference	4,135,000	4,135,785	210,691	210,691	0	0.000 %
27	KEXT-CA	Modesto, CA	BLTTA-20030123ACJ		526,136	11,117	11,117	0	0.000 %
27	K27EU(TV)	Sacramento, CA	BLTTTL-19970213JG				--- No Interference ---		
27	KEYT-TV	Santa Barbara, CA	BMPCDT-20060630ACN	1,299,000			--- No Interference ---		
27	KEYT-TV	Santa Barbara, CA	Reference	1,299,000	1,296,187	30,791	30,920	129	0.010 %
28	KFTL-CA	San Francisco, Etc., CA	BLTTA-20050105ACB		2,160,329	698,541	713,135	14,594	0.477 %
28	KDTV-CA	Santa Rosa, CA	BLTTA-20030212AAT				--- No Interference ---		