

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
KTUL, LLC
KTUL(TV) Tulsa, Oklahoma
Facility ID: 35685
Ch. 10 15 kW 578 m

KTUL, LLC (“*KTUL*”) is the licensee of analog television station KTUL(TV), Channel 8, Tulsa, Oklahoma (see BLCT-19880602KE). *KTUL* is also currently authorized to operate its pre and post-transition digital facility for KTUL(TV) on Channel 10 (BLCDT-20030519ADL). With the lifting of the filing freeze¹, *KTUL* herein proposes to apply for a Construction Permit to specify a maximized post-transition operation for KTUL(TV) from the existing tower (see Antenna Structure Registration Number 1010985). 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 Tulsa, Oklahoma 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 1,269,978 persons, which is 108.9 percent of the 1,166,000 persons that are predicted to receive interference free service from the Appendix B facility².

The proposed antenna is a Dielectric TCL-12A10 which is non-directional in the horizontal plane and is horizontally polarized with 0.75° of electrical beam tilt.

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 indicate that no new interference in excess of the 0.5% limit established in the Commission’s Third

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.

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

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Periodic Review³ is caused to affected stations by the post-transition KTUL(TV) operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**.

The proposed KTUL(TV) digital Channel 10 site is located more than 400 km from the nearest point on the international border with Mexico and does not require international coordination. The nearest FCC monitoring station is Grand Island, NE at a distance of 602 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.

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 1
PROPOSED COVERAGE CONTOURS

prepared June 2008 for
KTUL, LLC
 KTUL(TV) Tulsa, Oklahoma
 Facility ID 35685
 Ch. 10 15 kW 578 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Proposed KTUL(TV) "Post Transition" Facility
 Ch. 10 15 kW 578 m
 36 dBu F(50,90) Service Contour
 43 dBu F(50,90)
 Principal Community Contour

Tulsa

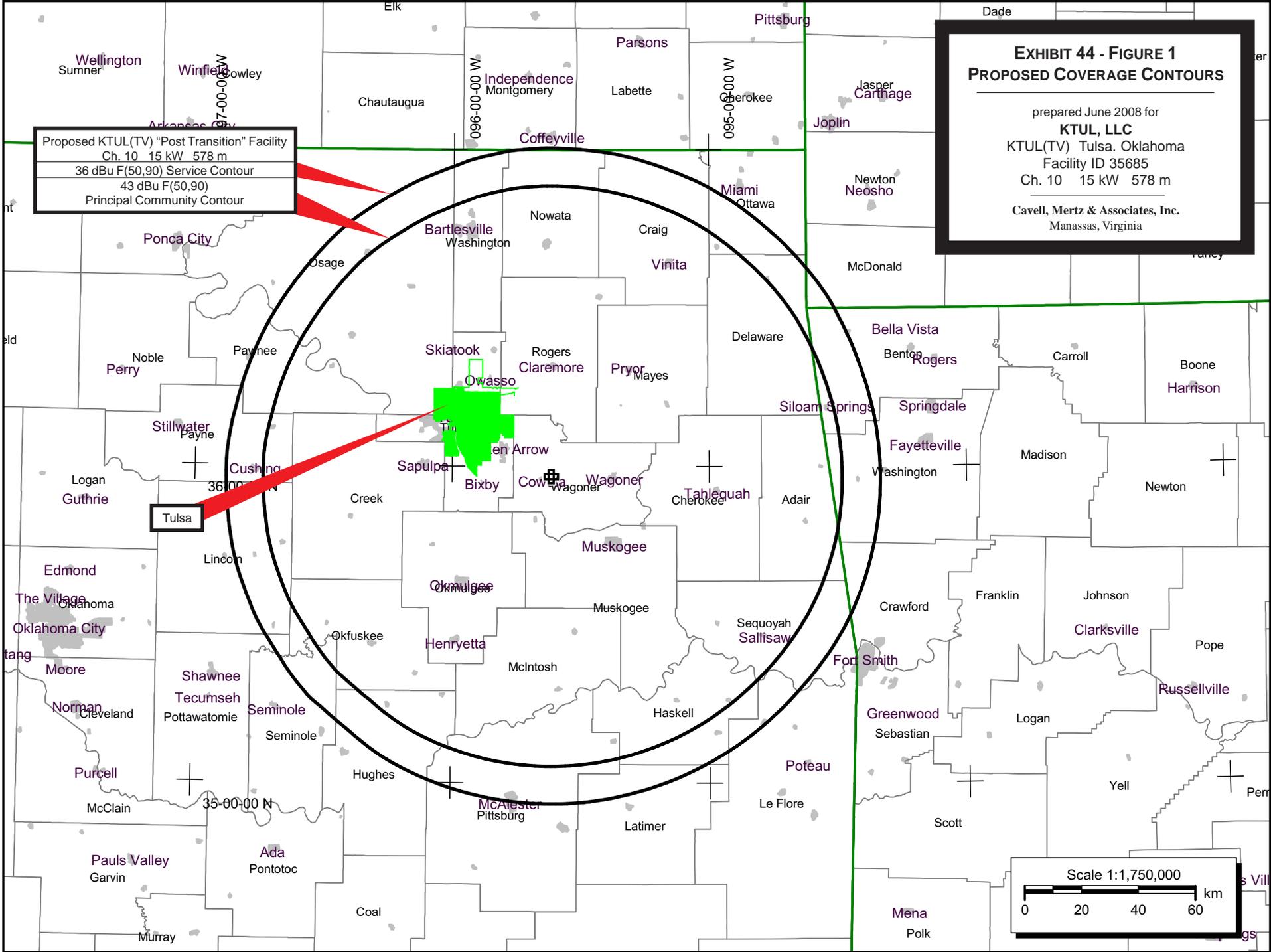
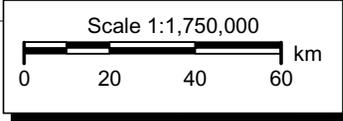


Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS

prepared for
KTUL, LLC
 KTUL(TV) Tulsa, OK
 Facility Id: 35685
 Ch. 10 15 kW 578 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 Population</u>	<u>Percentage</u>
9	KAFT(TV)	Fayetteville, AR	BLEDT-20041213ABJ	889,000	886,924	16,191	18,290	2,099	0.237 %
9	KAFT(TV)	Fayetteville, AR	Reference	889,000	886,924	16,191	18,290	2,099	0.237 %
9	KWNL-CA	Winslow, AR	BLTVL-20000703AEF				--- No Interference ---		
9	KWTV(TV)	Oklahoma City, OK	Reference	1,436,000	1,436,691	2,553	2,553	0	0.000 %
9	KWTV(TV)	Oklahoma City, OK	BPCDT-20080317AFP	1,436,000	1,503,506	3,395	3,395	0	0.000 %
10	KFDF-CA	Fort Smith, AR	BLTVA-20011031ABC		124,352	0	477	477	0.384 %
10	KAKE-TV	Wichita, KS	Reference	743,000	743,679	638	827	189	0.025 %
10	KAKE-TV	Wichita, KS	BPCDT-20080312ABB	743,000	742,554	824	968	144	0.019 %
10	KOLR(TV)	Springfield, MO	Reference	838,000	838,116	2,855	5,481	2,626	0.313 %
11	KOED-TV	Tulsa, OK	Reference	1,281,000	1,281,551	5,206	5,233	27	0.002 %
11	KOED-TV	Tulsa, OK	BPEDT-20080318ADB	1,281,000	1,276,521	4,846	4,911	65	0.005 %