

Exhibit 44 – Statement A  
**NATURE OF THE PROPOSAL**  
**PROPOSED ANTENNA SYSTEM**  
prepared for  
**ACC Licensee, Inc.**  
WJLA-TV Washington, D.C.  
Facility ID: 1051  
Ch. 7 13.6 kW 235 m

*ACC Licensee, Inc.* (“ACC”) is the licensee of analog television station WJLA-TV, Channel 7, Washington, D.C. (see BMLCT-19981224KI). ACC herein respectfully requests authorization to construct its post-transition facility for WJLA-TV in accordance the “Filing Freeze Waiver” policy in the Commission’s Third Periodic Review<sup>1</sup>. The proposed facility will, of necessity, extend the noise-limited Appendix B<sup>2</sup> service contour due to the limitations imposed by the allotment’s directional antenna pattern. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 7 and pre-transition digital operations on Channel 39.

The location proposed for WJLA-TV’s post-transition facility is the currently authorized WJLA-TV site. The tower is registered with the FCC, Antenna Structure Registration Number 1051670. ACC will employ the currently authorized analog Channel 7 non-directional antenna for the proposed WJLA-TV post-transition digital facility. The antenna is a Dielectric THP-O-10S-2-R which is considered non-directional in the horizontal plane with 0.5° 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 achieve replication of the analog Grade B contour and does not extend past the “5 mile” extension of the Appendix B service contour. 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 complies with the

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<sup>1</sup> 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.

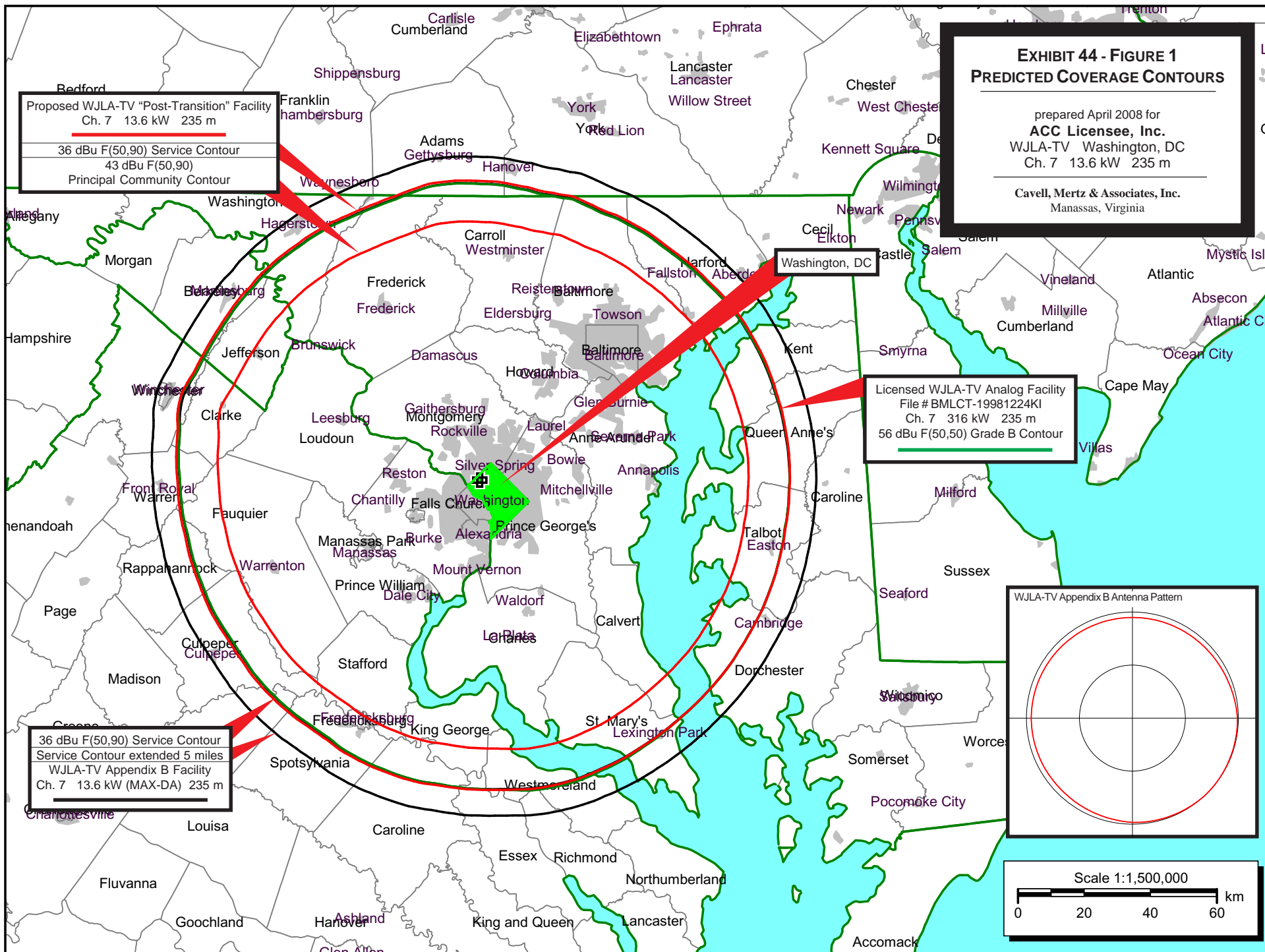
<sup>2</sup> See *Memorandum Opinion And Order On Reconsideration Of The Seventh Report And Order And Eighth Report And Order, In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 08-72, released March 6, 2008.

Commission's policy in that it does not create new interference in excess of the stated 0.5% limit.

**Exhibit 44-Figure 1** also provides the proposed facility's principal community coverage contour. As demonstrated therein, the principal community of Washington, D.C. 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 cover an interference free population of 7,269,790 persons. This exceeds the Appendix B population of 7,250,000 persons.

The proposed WJLA-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 Laurel, MD, at a distance of 32.7 km from the proposed site. The proposed effective radiated power ("ERP") of 13.6 kW on Channel 7 is significantly below that of the coordinated 316 kW analog facility currently in operation. Further, the proposed ERP is below the level specified in §73.1030(c)(3)(iv) 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.



# EXHIBIT 44 - FIGURE 1 PREDICTED COVERAGE CONTOURS

prepared April 2008 for  
**ACC Licensee, Inc.**  
WJLA-TV Washington, DC  
Ch. 7 13.6 kW 235 m

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

Licensed WJLA-TV Analog Facility  
File # BMLCT-19981224KI  
Ch. 7 316 kW 235 m  
56 dBu F(50,50) Grade B Contour

36 dBu F(50,90) Service Contour  
Service Contour extended 5 miles  
WJLA-TV Appendix B Facility  
Ch. 7 13.6 kW (MAX-DA) 235 m

Exhibit 44 – Table I  
**INTERFERENCE STUDY RESULTS**

prepared for  
**ACC Licensee, Inc.**  
WJLA-TV Washington, D.C.  
Facility ID: 1051  
Ch. 7 13.6 kW 235 m

<u>Channel</u>	<u>Affected Station</u>	<u>City</u>	<u>State</u>	<u>7th R&amp;O Table Baseline (2000 Census)</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population 7th R&amp;O facility (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>Population Difference</u>	<u>New Interference</u>
7	WBNG-TV	Binghamton	NY	1,000,000	1,000,820	19,597	19,597	0	0.00%
7	WABC-TV	New York	NY	19,365,000	19,365,095	178,255	178,255	0	0.00%
7	WHRE(TV)	Virginia Beach	VA	1,714,000	1,714,066	935	935	0	0.00%
7	WTRF-TV	Wheeling	WV	2,373,000	2,373,911	2,830	3,166	336	0.01%
8	WWCP-TV	Johnstown	PA	2,536,000			- - -No interference - - -		
8	WGAL(TV)	Lancaster	PA	4,088,000	4,088,145	152,951	152,951	0	0.00%