

## EXHIBIT 46 PUBLIC INTEREST STATEMENT

Fisher Broadcasting - Washington TV, L.L.C. ("Fisher") currently operates digital television station KLEW-TV on Channel 32 pursuant to its special temporary authority ("STA") in FCC File No. BDSTA-20020208ABT (and subsequent extensions of that STA, including, most recently, File No. BELDSTA-20081107AEP). Current operating parameters are 133 kW ERP at 349 meters HAAT. By the instant application, Fisher seeks to make these parameters the permanent operating parameters of KLEW-TV.

In the new DTV Table of Allotments ("TOA"), the FCC allotted KLEW-TV Channel 32 for post-transition operation at 200 kW ERP, 361 meters HAAT, which are the operating parameters specified in the Station's current construction permit, FCC File No. BPCDT-19991021ACJ. The instant application would modify KLEW-TV's CP such that the Station's ultimate service would exceed the TOA facility and current CP, *see* Exhibit 47 (analyzing the proposed coverage and concluding that it will "PROVIDE 102% REPLICATION OF THE AUTHORIZED OPERATION (BPCDT-19991021ACJ)/APPENDIX B SERVICE POPULATION"), although there would be a small loss area.

The current proposal and operation contemplates and uses a side-mount antenna, whereas the TOA facility contemplates use of a top-mount antenna. Because the Station's analog antenna is top-mounted, Fisher, as noted above, had sought and obtained STA to operate past the June 12 transition deadline from its side-mount antenna. While Fisher had intended to construct KLEW-TV's full TOA/CP facility (during spring and early summer the Station sought and obtained quotations from the antenna vendor and tower crews for installation work to be done over the summer and into the autumn), its experience in operating the Station's current STA facility in the extremely hilly and mountainous terrain that surrounds Lewiston has proven that the coverage provided by the STA operation has exceeded Fisher's expectations and that construction of the full facility is unwarranted. Had Fisher fully appreciated prior to June 12, 2009, the substantial similarity between the current STA population coverage and the TOA population coverage, authorization to make the instant proposal the final post-transition facility would have been sought sooner. Upon grant of the instant request, no further construction will be required for KLEW-TV's post-transition DTV facility.

As explained in further detail in the Engineering Exhibit attached to the instant application, a Longley-Rice analysis demonstrates that grant of the proposal would result in a net gain of more than 2,400 people (proposed CP population [135,582] minus TOA/CP population [133,000] is 2,582; further subtraction of the loss population [166] equals 2,416). **Most significantly, a Longley-Rice analysis demonstrates that a grand total of 166 persons (the "unmatched population") would not receive KLEW-TV over the air (a service loss of just over one-one-hundredth of one percent [0.001%]) in the "loss area" that lies between the predicted 41 dBu contour of the TOA/CP facility and the predicted 41 dBu contour of the proposed facility.** The combination of the net gain in population combined with the truly *de minimis* population in the loss area render the instant request consistent with the public interest.

Moreover, the Commission, in the TOA, had already contemplated service to fewer viewers than the Station's analog service, which means that the only relevant comparison for purposes of this public interest showing is the Station's TOA/CP facility. The Station has provided, and continues to provide, viewers with information about the DTV transition, including detailed information about service loss, which remains available on the Station's website at <http://www.klewtv.com/programming/34101894.html>. As demonstrated in the Station's Form 388 DTV Quarterly Activity Station Reports, KLEW-TV routinely far outperformed the Commission's DTV education requirements, and made exemplary efforts to prepare viewers for the digital transition.

Given the very small number of viewers in the loss area (166), it would be difficult for Fisher to justify the additional expense required to acquire a new antenna and install it on the top of the tower. Such expenses seem unnecessary given the fact that the Station's currently constructed STA facility already provides service to more viewers than would the TOA facility.

Accordingly, grant of the instant request would not be contrary to the public interest. In fact, the public interest is served because the STA (and proposed continued) operation brings and will continue to bring service to viewers in excess of those who would have received the signal using the TOA/CP facility.

For the foregoing reasons, Fisher respectfully requests that the Commission authorize KLEW-TV's currently-constructed STA facility as the Station's full post-transition facility by granting the instant application, and to the extent necessary, revise the DTV TOA to indicate KLEW-TV's technical parameters specified herein.

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