

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
United Communications Corporation
WWNY-TV Carthage, New York
Facility ID 68851
Ch. 7 14.5 kW 219 m

United Communications Corporation (“*United*”) is the licensee of analog television station WWNY-TV, Channel 7, Carthage, New York (see BLCT-2160). *United* herein respectfully requests authorization to construct its post-transition facility for WWNY-TV in accordance the “Filing Freeze Waiver” policy in the Commission’s Third Periodic Review¹. The proposed facility will, of necessity, extend the noise-limited Appendix B² service contour. *United* proposes to locate its post-transition facility for WWNY-TV at the existing Channel 7 analog site 0.03 km distant from the allotment site reference coordinates and to employ the existing Channel 7 non-directional antenna. 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 35.

The location proposed for WWNY-TV’s post-transition facility is the currently authorized WWNY-TV analog site. The tower is registered with the FCC, Antenna Structure Registration Number 1016048. *United* will employ the currently authorized analog Channel 7 non-directional antenna for the proposed WWNY-TV post-transition digital facility. The antenna is a GE TY-30H which is considered non-directional in the horizontal plane with 0.75° 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 comes as close as possible to achieving replication of the Grade B contour using the existing WWNY-TV Channel 7 non-directional

¹ 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.

² 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.

Exhibit 44 – Statement A

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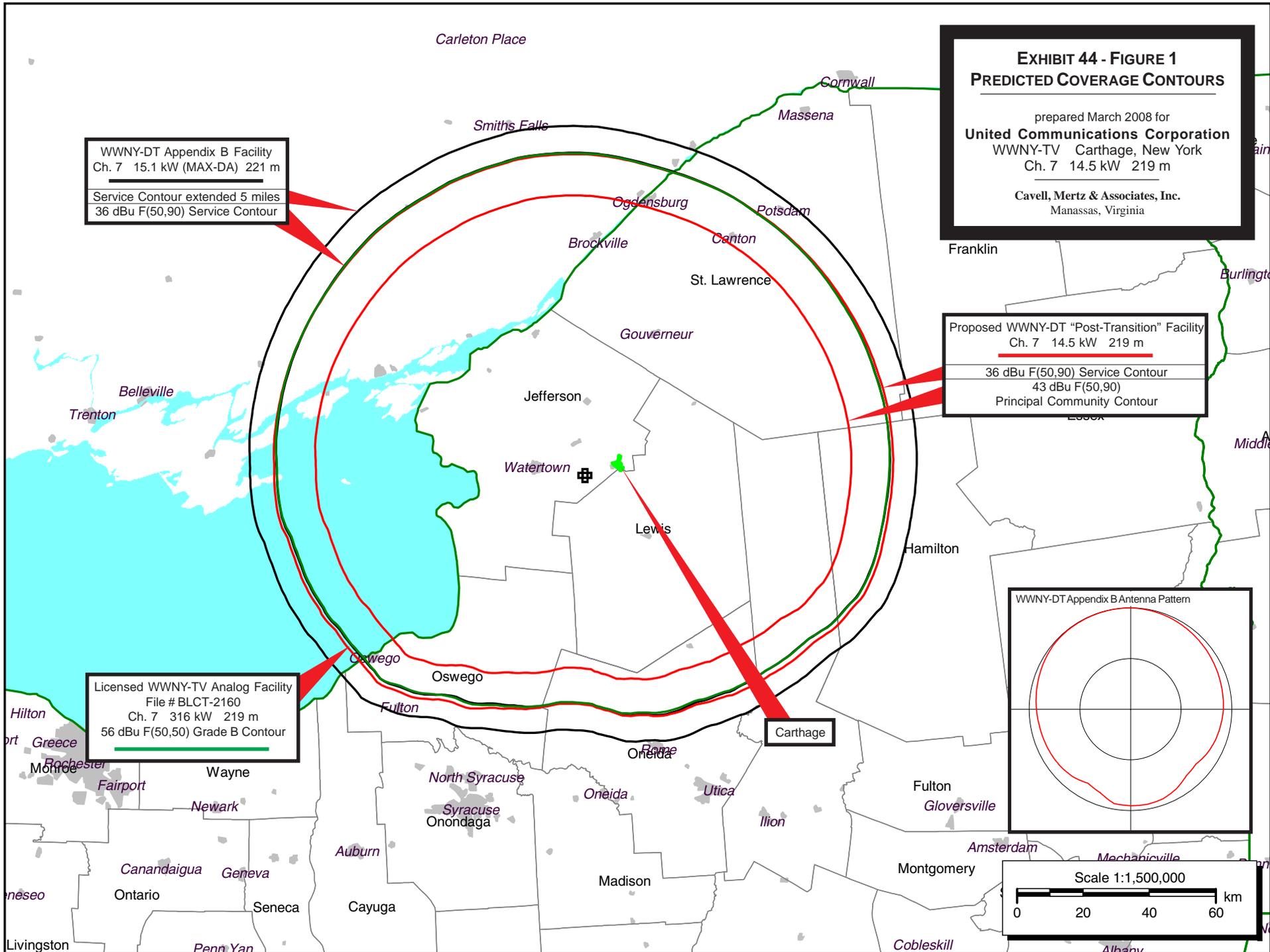
antenna. Further, the service contour for the proposed facility does not extend past the “5 mile” extension of the Appendix B service contour. Accordingly, **Exhibit 44-Table I** provides the results of the required interference study. As demonstrated therein, the proposed facility complies with the Commission’s stated “Filing Freeze Waiver” 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 Carthage, New York is predicted to receive the enhanced signal level as required in §73.625(c) of the Commission’s Rules. The proposed facility is predicted to cover an interference free population of 261,592 persons. This exceeds the Appendix B population of 259,000 persons.

The proposed WWNY-TV site is located 49.3 km from the nearest points on the U.S.-Canadian border and does require international coordination. We understand from Commission Staff that such coordination has been on-going with Canadian officials regarding WWNY-TV’s post-transition operation and may have already been achieved.

The nearest FCC monitoring station is at Canandaigua, New York, at a distance of 169.9 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. 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.



WWNY-DT Appendix B Facility
 Ch. 7 15.1 kW (MAX-DA) 221 m
 Service Contour extended 5 miles
 36 dBu F(50,90) Service Contour

EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS
 prepared March 2008 for
United Communications Corporation
 WWNY-TV Carthage, New York
 Ch. 7 14.5 kW 219 m
 Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Proposed WWNY-DT "Post-Transition" Facility
 Ch. 7 14.5 kW 219 m
 36 dBu F(50,90) Service Contour
 43 dBu F(50,90)
 Principal Community Contour

Licensed WWNY-TV Analog Facility
 File # BLCT-2160
 Ch. 7 316 kW 219 m
 56 dBu F(50,50) Grade B Contour

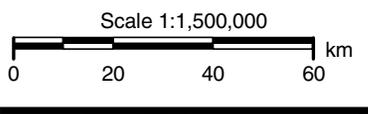
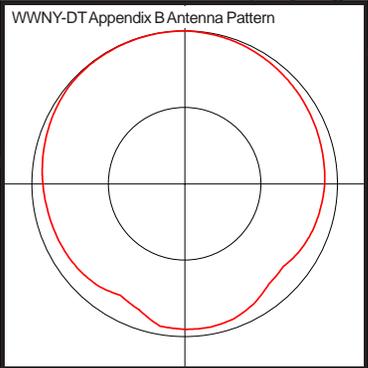


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS
 prepared for
United Communications Corporation
 WWNY-TV Carthage, New York
 Facility ID 68851
 Ch. 7 14.5 kW 219 m

<u>Channel</u>	<u>Affected Station</u>	<u>City</u>	<u>State</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>Population Difference</u>	<u>New Interference</u>
7	WHDH-TV	Boston	MA	7,035,000				---No interference---	
7	WXXA-TV	Albany	NY	1,488,000	1,488,199	17,044	17,099	55	0.004%
7	WBNG-TV	Binghamton	NY	1,000,000	1,000,820	19,597	20,271	674	0.067%
7	WABC-TV	New York	NY	19,365,000				---No interference---	
7	WNGS	Springville	NY	1,363,000	1,363,162	15,533	16,230	697	0.051%
8	WICZ-TV	Binghamton	NY	751,000				---No interference---	