

Exhibit 44 – Statement A - Amended  
**NATURE OF THE PROPOSAL**  
**PROPOSED ANTENNA SYSTEM**  
prepared for  
**Sunflower Broadcasting, Inc.**  
**KSCW(TV) Wichita, Kansas**  
Facility ID: 72348  
Ch. 19 1000 kW 421 m

Sunflower Broadcasting, Inc. (“*SBI*”) is the licensee of television stations KSCW(TV), channel 33, Wichita, KS (see BLCT-20010717AAW) and KWCH-TV/DT, analog channel 12 and pre-transition digital channel 19, Hutchinson, Kansas. In keeping with the Commission’s recent grant of an alternative channel assignment<sup>1</sup> for KSCW, *SBI* recently submitted an Application for Construction Permit for post-transition KSCW(DT) that specifies the existing KWCH-DT site. (BPCDT-20080408AAK). With the lifting of the filing freeze<sup>2</sup>, *SBI* herein proposes to modify its pending application to specify a maximized post-transition operation for KSCW(TV) from an existing tower (see Antenna Structure Registration Number 1046283). The facility will become operational following termination of the KWCH-TV analog transmission on Channel 12<sup>3</sup> after 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 Wichita, Kansas 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 829,621 persons, which is 110.9 percent of the 748,000 persons that are predicted to receive interference free service from the Appendix B facility<sup>4</sup>.

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<sup>1</sup> 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 Broadcasting Service*, MB Docket No. 87-268, FCC 08-72, Released March 6, 2008 at paragraph 72, Appendix D4, and footnote 185.

<sup>2</sup> 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.

<sup>3</sup> Following the cessation of KWCH-TV analog channel 12 broadcasting, *SBI* is authorized (see BPCDT-20080313ACP) to replace the KWCH-TV channel 12 antenna and transmission line and make modifications to the transmitter in preparation of KWCH-DT digital broadcasting on channel 12. Until this work is completed, continued operation of the KWCH-DT pre-transition channel 19 facility is required, as explained in the Form 387 filed for KWCH-DT. Until the channel 19 facility is available, KSCW(DT) intends to continue broadcasting utilizing its pre-transition, channel 31 facility. Initial studies indicated that such continued operation would not exceed 0.5% new interference to pertinent, post-transition stations.

<sup>4</sup> 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

The proposed antenna is a Dielectric TFU-30DSC-R-04 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 Periodic Review<sup>5</sup> is caused to affected stations by the post-transition KSCW(TV) operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**.

The proposed 1000 kW ERP exceeds the maximum permitted ERP of 770 kW for the proposed antenna HAAT of 421 meters currently permitted by §73.622(f)(8)(i). However, §73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the station having the largest coverage area within the same market. In this case, a coverage area larger than the 770 kW/421 m HAAT coverage area is currently provided by the licensed digital facility for co-owned digital television station KWCH-DT (Ch. 19, Hutchinson, KS, 1000kW/421 m HAAT). KWCH-DT is licensed to operate from the transmitter site and facilities proposed herein. The area within the proposed KSCW 41 dBμ service contour will therefore be identical to the coverage area within the licensed KWCH-DT service contour. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

The proposed KSCW(TV) digital Channel 19 site is located more than 400 km from the nearest points on the international borders with Canada and Mexico and does not require international coordination. The nearest FCC monitoring station is Grand Island, NE at a distance of 323 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.

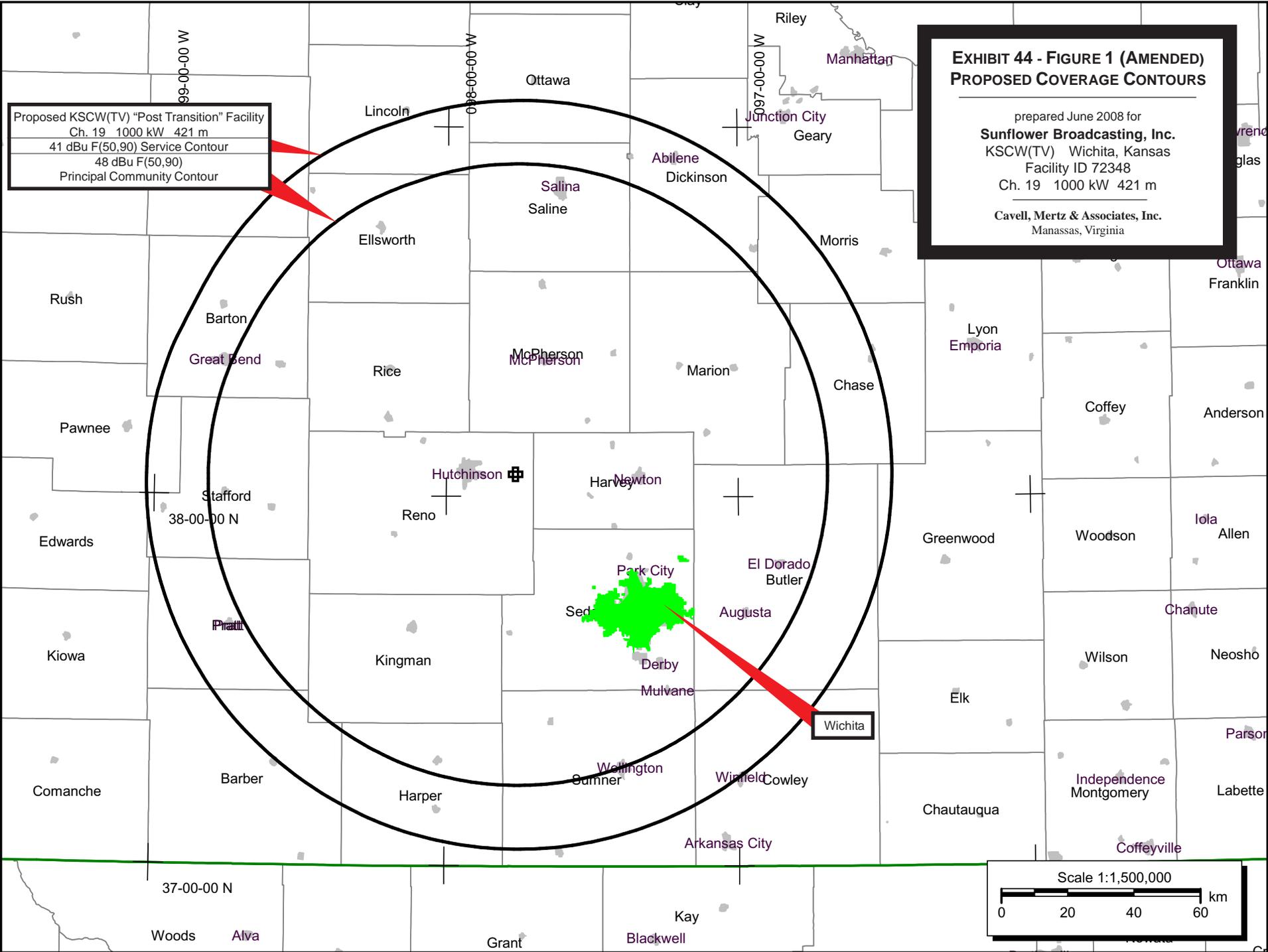
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<sup>5</sup> See *Report and Order, Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, MB Docket No. 07-91, FCC 07-228, Released December 31, 2007.

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Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.



Proposed KSCW(TV) "Post Transition" Facility  
 Ch. 19 1000 kW 421 m  
 41 dBu F(50,90) Service Contour  
 48 dBu F(50,90)  
 Principal Community Contour

**EXHIBIT 44 - FIGURE 1 (AMENDED)**  
**PROPOSED COVERAGE CONTOURS**

prepared June 2008 for  
**Sunflower Broadcasting, Inc.**  
 KSCW(TV) Wichita, Kansas  
 Facility ID 72348  
 Ch. 19 1000 kW 421 m

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

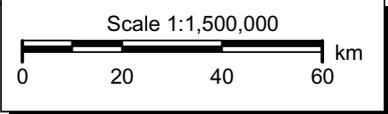


Exhibit 44 - Table I  
**INTERFERENCE STUDY RESULTS**

prepared for  
**Sunflower Broadcasting, Inc.**  
 KSCW(TV) Wichita, KS  
 Facility Id: 72348  
 Ch. 19 1000 kW 421 m

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</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>New Interference</u>	
								<u>Population</u>	<u>Percentage</u>
19	KWKS(TV)	Colby, KS	BLEDT-20070601ATA	43,000	42,882	256	273	17	0.040 %
19	KWKS(TV)	Colby, KS	Reference	43,000	43,031	263	280	17	0.040 %
19	KTVG(TV)	Grand Island, NE	BPCDT-19991015ABA	195,000	195,515	43	102	59	0.030 %
19	KTVG(TV)	Grand Island, NE	Reference	195,000	195,515	43	102	59	0.030 %
19	KTVG(TV)	Grand Island, NE	BMPCDT-20080317ACI	195,000			---	---	---
19	KUOT-CA	Oklahoma City, OK	BPTTA-20060111ACN				---	---	---
19	KUOT-CA	Oklahoma City, OK	BLTTA-20040811ADD				---	---	---