

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Harrisburg Television, Inc.
WHTM-TV Harrisburg, Pennsylvania
Facility ID: 72326
Ch. 10 19.7 kW 346 m

Harrisburg Television, Inc. (“*Harrisburg*”) is the licensee of analog television station WHTM-TV, Channel 27, Harrisburg, Pennsylvania (see BLCT-19960626KF). *Harrisburg* is also authorized to operate the pre and post-transition digital facility for WHTM-TV on Channel 10 (BLCDDT-20040812AAH). With the lifting of the filing freeze¹, *Harrisburg* herein proposes to apply for a CP to specify a maximized post-transition operation for WHTM-TV from the existing tower (see Antenna Structure Registration Number 1033740). 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 Harrisburg, Pennsylvania 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 2,608,385 persons, which is 119.4 percent of the 2,185,000 persons that are predicted to receive interference free service from the Appendix B facility².

The proposed antenna is a Dielectric TW-9B10, which is non-directional in the horizontal plane and is horizontally polarized with 0.5° 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

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

The proposed WHTM-TV digital Channel 10 site is located less than 400 km from the nearest point on the international border with Canada. Thus, international coordination is respectfully requested. The nearest FCC monitoring station is Laurel, MD at a distance of 128 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 located outside the area identified in section 73.1030(a)(i) that would require coordination with the National Radio Astronomy Observatory facility in Green Bank, West Virginia.

The existing site is 1.5 km from directional AM stations WTKT (1460 kHz) and WHP (580 kHz) both licensed to Harrisburg, PA. Since the instant proposal is located on an existing structure and does not involve tower construction that would change the overall tower height, it is respectfully requested that the construction permit for the facility proposed herein not be conditioned with the requirements in §73.1692 of the Commission's Rules.

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.

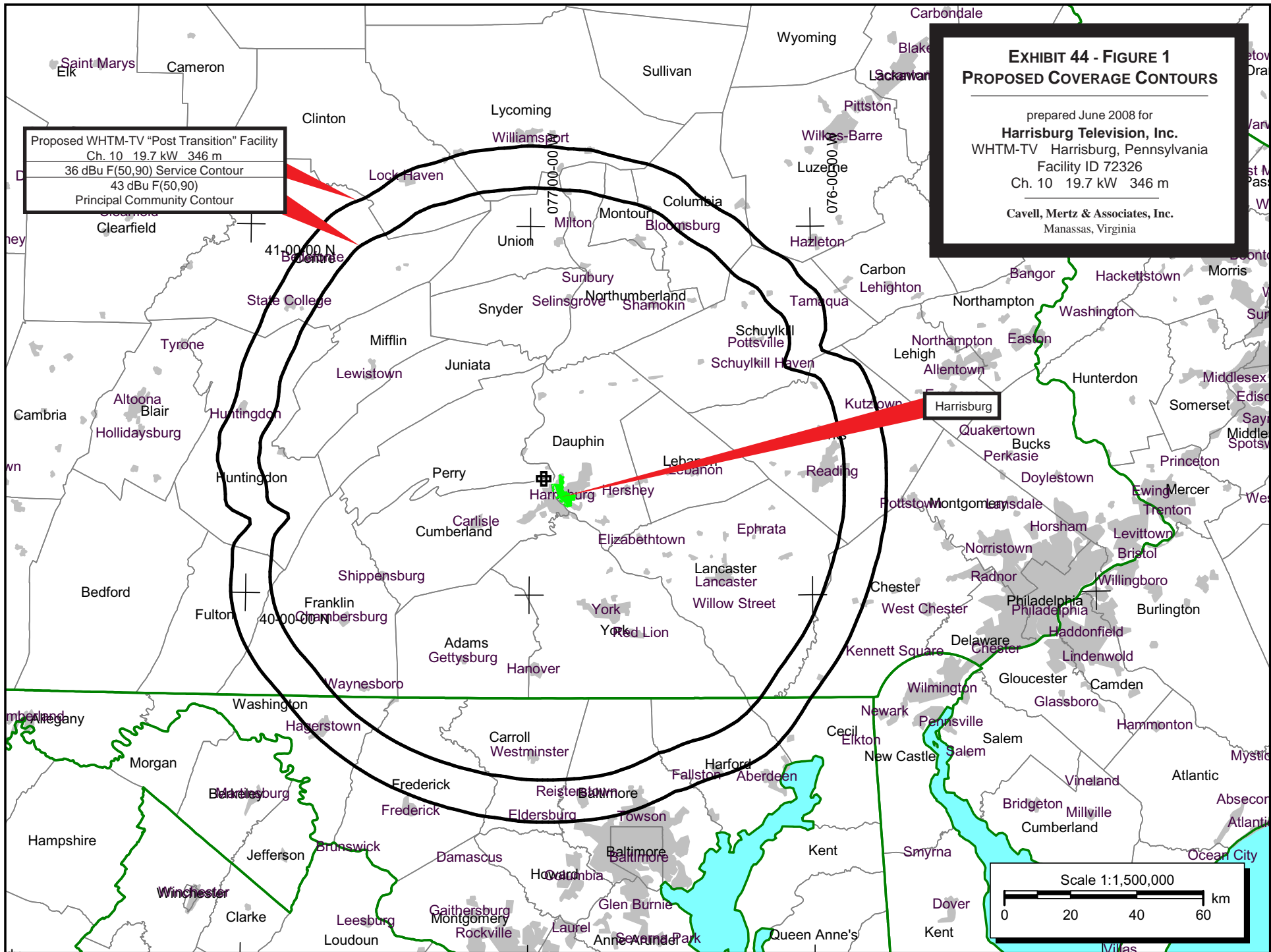


Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS

prepared for
Harrisburg Television, Inc.
WHTM-TV Harrisburg, PA
Facility Id: 72326
Ch. 10 19.7 kW 346 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</u>	
								<u>Population</u>	<u>Percentage</u>
9	WUSA(TV)	Washington, DC	BMPCDT-20080425ABL	7,238,000	7,234,214	16,214	16,656	442	0.006 %
9	WUSA(TV)	Washington, DC	Reference	7,238,000	7,238,057	13,401	14,679	1,278	0.018 %
9	WBPH-TV	Bethlehem, PA	BLCDDT-20060609AAH	5,211,000	5,211,835	619,267	620,081	814	0.016 %
9	WBPH-TV	Bethlehem, PA	Reference	5,211,000	5,211,835	619,267	620,081	814	0.016 %
10	WTNH(TV)	New Haven, CT	BLCDDT-20040701AEC	6,215,000	6,029,294	1,032,574	1,033,672	1,098	0.018 %
10	WTNH(TV)	New Haven, CT	Reference	6,215,000	6,029,294	1,032,574	1,033,672	1,098	0.018 %
10	WHEC-TV	Rochester, NY	BPCDDT-20080425AAZ	1,207,000	1,264,636	72	201	129	0.010 %
10	WHEC-TV	Rochester, NY	Reference	1,207,000	1,207,794	92	997	905	0.075 %
10	WOIO(TV)	Shaker Heights, OH	BLCDDT-19991110AAR	3,558,000			---	No Interference	---
10	WOIO(TV)	Shaker Heights, OH	Reference	3,558,000			---	No Interference	---
10	WAZT-CA	Woodstock, VA	BLTVA-20030718ADF				---	No Interference	---
10	WVFX(TV)	Clarksburg, WV	BMPCDDT-20020930AAV	566,000	566,114	29,189	29,189	0	0.000 %
10	WVFX(TV)	Clarksburg, WV	Reference	566,000	566,114	29,189	29,189	0	0.000 %
11	WBAL-TV	Baltimore, MD	BPCDDT-20080312AAT	6,953,000	6,956,364	218,648	228,514	9,866	0.142 %
11	WBAL-TV	Baltimore, MD	Reference	6,953,000	6,952,305	280,788	289,971	9,183	0.132 %
11	WPCW(TV)	Jeannette, PA	Reference	2,960,000			---	No Interference	---
11	WBRE-TV	Wilkes-Barre, PA	BLCDDT-20051123AJX	2,524,000	2,524,515	139,564	141,162	1,598	0.063 %
11	WBRE-TV	Wilkes-Barre, PA	Reference	2,524,000	2,524,515	139,564	141,162	1,598	0.063 %