

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
WKYC-TV, Inc.
WKYC-TV Cleveland, Ohio
Facility ID 73195
Ch. 17 868 kW (MAX-DA) 307.1 m

WKYC-TV, Inc. (“*Gannett*”) is the licensee of analog television station WKYC-TV, Channel 3, Cleveland, Ohio (see BLCT-19981214KE). *Gannett* herein respectfully requests authorization to construct its post-transition facility for WKYC-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. *Gannett* proposes to locate its post-transition facility for WKYC-TV at the existing Channel 3 analog site and will employ a new Channel 17 antenna. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 3 and pre-transition digital operations on Channel 2.

The location proposed for WKYC-TV’s post-transition facility is the currently authorized WKYC-TV analog site. The tower is registered with the FCC, Antenna Structure Registration Number 1013919. Since WKYC-TV was allotted a post-transition channel different than its analog or pre-transition digital channels, a new antenna will be required.

The new antenna is a Dielectric TFU-20EBT-R 4C150 which is directional in the horizontal plane with 0.75° of electrical beam tilt. **Exhibit 44-Figure 1** provides the antenna azimuth relative field pattern properly oriented with respect to True North. A tabulation of the antenna azimuth relative field data is provided in “Tech Box” 10e of FCC Form 301. The antenna vertical plane (elevation) pattern is depicted in **Exhibit 44-Figure 2**.

Exhibit 44-Figure 3 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

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.

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 close but never achieves replication of the Grade B contour due to the allotment facility’s UHF power limitation and the negotiated power limitations towards Canada. 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 3 also provides the proposed facility’s principal community coverage contour. As demonstrated therein, the principal community of Cleveland, Ohio 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 4,253,402 persons or 99.8 percent of the Appendix B population of 4,263,000 persons.

The proposed WKYC-TV site is located 59.9 km from the nearest point on the U.S.-Canadian border and does require international coordination. We understand from Commission Staff that such coordination has been achieved³.

The nearest FCC monitoring station is at Allegan, Michigan, at a distance of 378.6 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.

³ Id at ¶ 132

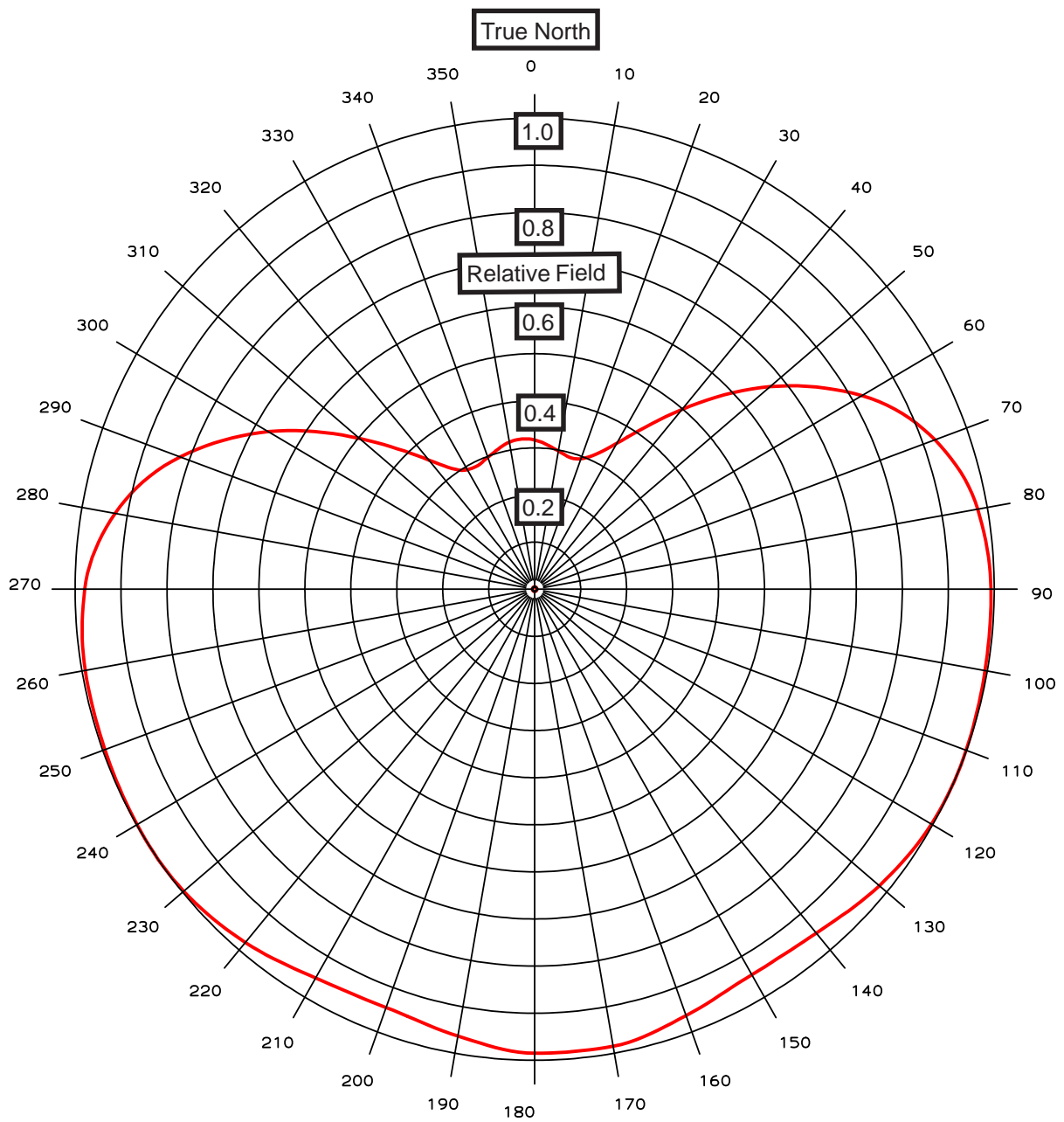


EXHIBIT 44 - FIGURE 1
ANTENNA AZIMUTH RELATIVE
FIELD PATTERN

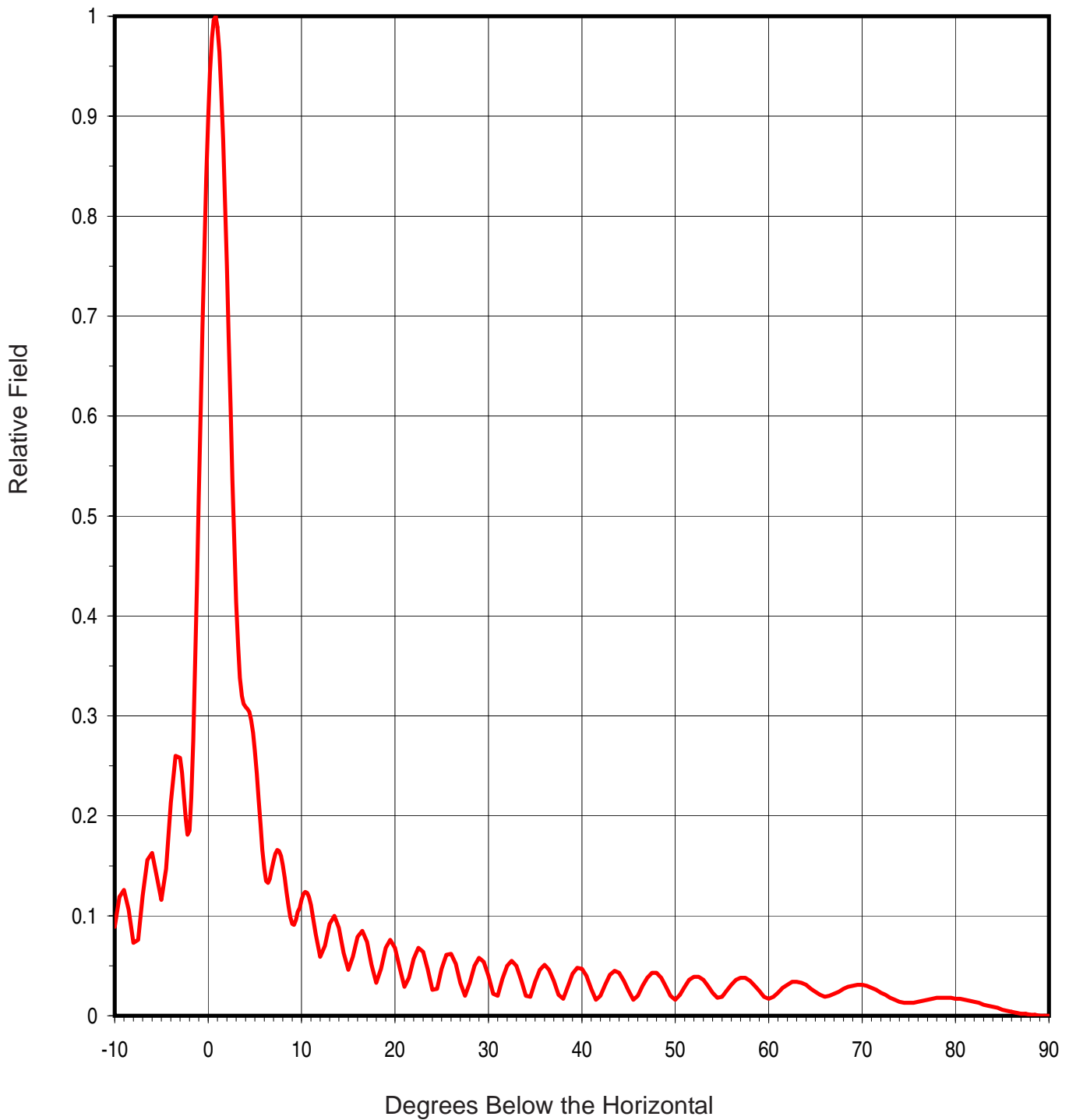
prepared April 2008 for
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Cavell, Mertz & Associates, Inc.
Manassas, Virginia

EXHIBIT 44 - FIGURE 2
ANTENNA VERTICAL PLANE (ELEVATION)
RELATIVE FIELD PATTERN

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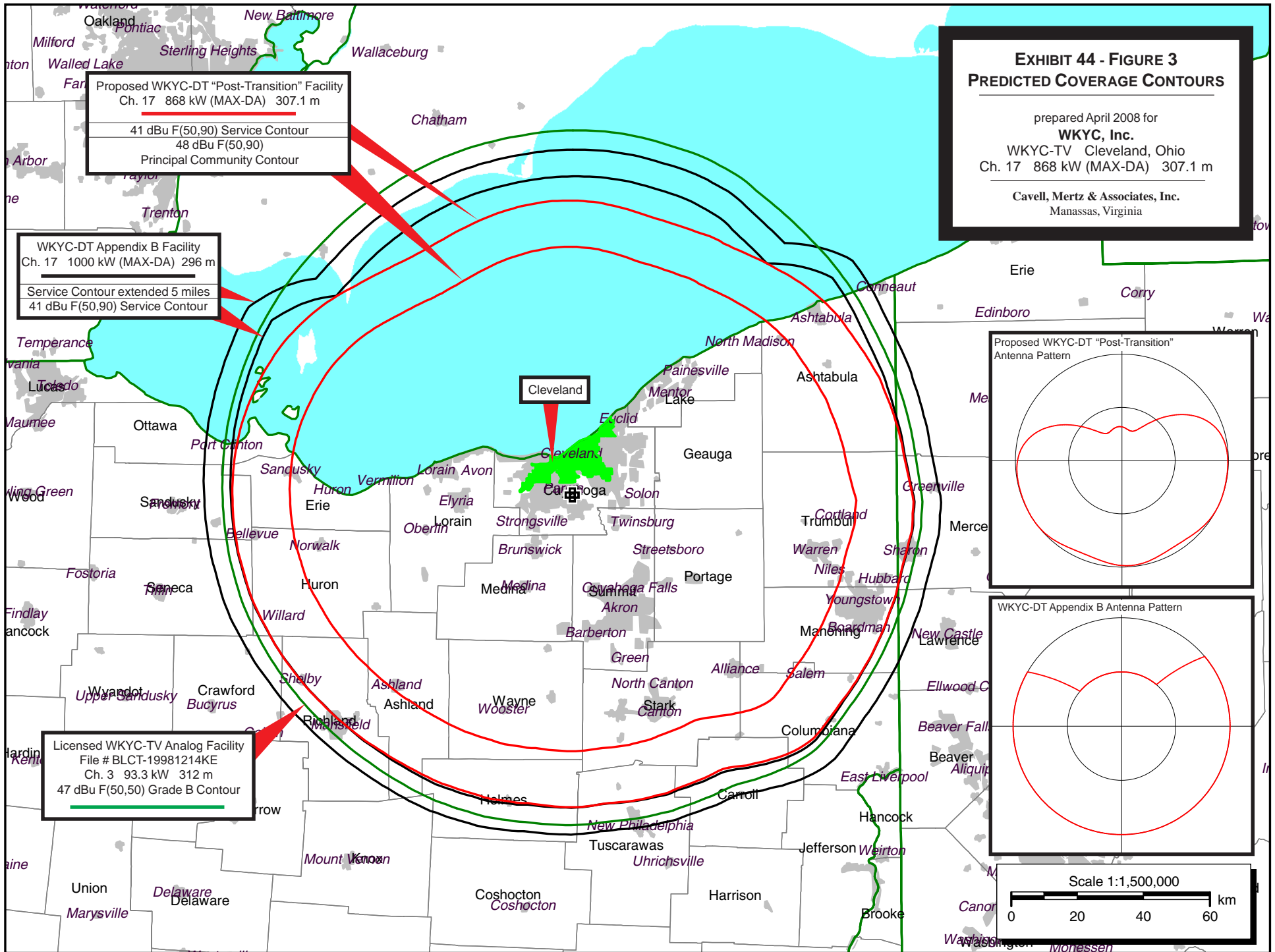


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS
 prepared for
WKYC-TV, Inc.
 WKYC-TV Cleveland, Ohio
 Facility ID 73195
 Ch. 17 868 kW (MAX-DA) 307.1 m

<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>
16	WSEE-TV	Erie	PA	636,000			- - No Interference - -		
17	WQCW	Portsmouth	OH	492,000	492,637	3,411	3,257	-154	-0.0313%