

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
WSBT, Inc.
WSBT-DT South Bend, Indiana
Facility ID: 73983
Ch. 22 266 kW 332.6 m

WSBT, Inc. (“*WSBT*”) is the licensee of analog television station WSBT-TV, Channel 22, South Bend, Indiana (see BLCT-19880523KH). *WSBT* is also currently authorized to construct the post-transition digital facility for WSBT-TV on Channel 22¹. With the lifting of the filing freeze², *WSBT* recently amended its pending CP to specify a maximized post-transition operation³. *WSBT* now seeks to modify that application to make a slight (0.2 meter) correction in antenna elevation and no other changes. No construction is proposed so there will be no change in the overall height of the existing tower structure⁴. 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 South Bend, Indiana 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 1,608,665 persons, which is 105.8 percent of the 1,521,000 persons that are predicted to receive interference free service from the Appendix B facility⁵.

The proposed antenna is a Dielectric TUA-O4-16/64H-1-T-R 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

¹ See File Number BPCDT-20080317AHE.

² 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.

³ See File Number BMPCDT-20080620ABV.

⁴ See Antenna Structure Registration Number 1030677.

⁵ 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

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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 Review⁶ is caused to affected stations by the post-transition WSBT-TV operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**. Because the previously provided study was based on an antenna height of 574 meters above mean sea level (“AMSL”, when rounded to the nearest meter) and the antenna height specified herein is also 574.0 meters AMSL (with no rounding), the only changes in coverage or interference population are due to application facilities also filed during the recent DTV maximization window.

The proposed WSBT-TV digital Channel 22 site is located less than 400 km from the nearest point on the international border with Canada, international coordination is respectfully requested. The nearest FCC monitoring station is Allegan, MI at a distance of 112 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 existing site is colocated with WSBT(AM). Since the instant change will utilize the existing WSBT-TV antenna and involves no tower construction, 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.

⁶ 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

WSBT, Inc.

WSBT-TV South Bend, Indiana

Facility Id: 73983

Ch. 22 266 kW 332.6 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 Population</u>	<u>Percentage</u>
14	WOBC-CA	Battle Creek, MI	BLTTA-20021206AAN				--- No Interference ---		
21	WYCC(TV)	Chicago, IL	BLEDT-20030501ABC	8,983,000	8,983,541	12,630	14,030	1,400	0.016 %
21	WYCC(TV)	Chicago, IL	Reference	8,983,000	8,983,541	12,630	14,030	1,400	0.016 %
21	WFYI(TV)	Indianapolis, IN	BLEDT-20030310BAD	1,912,000			--- No Interference ---		
21	WFYI(TV)	Indianapolis, IN	Reference	1,912,000			--- No Interference ---		
22	WBUI(TV)	Decatur, IL	BPCDT-20080620AFV	918,000	1,057,197	669	740	71	0.007 %
22	WBUI(TV)	Decatur, IL	Reference	918,000	918,252	60	90	30	0.003 %
22	WBUI(TV)	Decatur, IL	BLCDDT-20040521ADS	918,000	918,252	60	90	30	0.003 %
22	WVUT(TV)	Vincennes, IN	Reference	268,000			--- No Interference ---		
22	WVUT(TV)	Vincennes, IN	BPEDT-20080530AAN	268,000			--- No Interference ---		
22	WNEM-TV	Bay City, MI	BMPEDT-20040721AMM	1,507,000	1,509,251	66,037	66,037	0	0.000 %
22	WNEM-TV	Bay City, MI	Reference	1,507,000	1,507,055	72,152	72,152	0	0.000 %
22	WBKA-CA	Bucyrus, OH	BLTTL-19890227IQ				--- No Interference ---		
22	WVCY-TV	Milwaukee, WI	BLCDDT-20060619AAX	2,440,000	2,384,695	17,478	19,297	1,819	0.076 %
22	WVCY-TV	Milwaukee, WI	Reference	2,440,000	2,440,402	33,324	34,129	805	0.033 %
22	W22BW(TV)	Sturgeon Bay, WI	BLTTL-19970905JD				--- No Interference ---		
23	WWME-CA	Chicago, IL	BLTTA-20040129AOW				--- No Interference ---		
23	WIPB(TV)	Muncie, IN	BMPEDT-20080620AAH	1,494,000			--- No Interference ---		
23	WIPB(TV)	Muncie, IN	Reference	1,494,000			--- No Interference ---		
23	WIPB(TV)	Muncie, IN	BPEDT-20080227ABW	1,494,000			--- No Interference ---		
25	WOGC-CA	Holland, MI	BLTTA-20020812ACT				--- No Interference ---		