

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Peak Media Of PA Licensee LLC
WWCP-TV Johnstown, Pennsylvania
Facility ID: 20295
Ch. 8 8.4 kW 368 m

Peak Media Of PA Licensee LLC (“*Peak*”) is the licensee of analog television station WWCP-TV, Channel 8, Johnstown, Pennsylvania. (see BLCT-19861023KJ). *Peak* herein respectfully requests authorization to construct its post-transition facility for WWCP-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. *Peak* proposes to employ the existing Channel 8 analog directional antenna. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 8 and pre-transition digital operations on Channel 29.

The location proposed for WWCP-TV’s post-transition facility is the currently authorized WWCP-TV analog site. The tower is registered with the FCC, Antenna Structure Registration Number 1026534. *Peak* will employ the currently authorized analog Channel 8 directional antenna (FCC antenna ID No. 16277) for the proposed WWCP-TV post-transition digital facility. The antenna is an RCA Model THP-SP26-6-1-R(8) which is directional in the horizontal plane with 0.6° 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 achieves, as much as possible, replication of the Grade B contour using the existing WWCP-TV Channel 8 directional 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

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

(Page 2 of 2)

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 Johnstown, Pennsylvania 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 2,604,163 persons. This exceeds the Appendix B population of 2,536,000 persons.

The proposed WWCP-TV site is located 258.4 km from the nearest point on the Canadian border. Thus, if necessary, international coordination with Canada is respectfully requested. The nearest FCC monitoring station is at Laurel, Maryland at a distance of 229.6 km from the proposed site. This distance exceeds that 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.

EXHIBIT 44 - FIGURE 1
PROPOSED COVERAGE CONTOURS

prepared April 2008 for
Peak Media of PA Licensee, LLC.
 WWCP-TV Johnstown, Pennsylvania
 Ch. 8 8.4 kW (MAX-DA) 368 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Proposed WWCP-TV "Post-Transition" Facility
 Ch. 8 8.4 kW (MAX-DA) 368 m

36 dBu F(50,90) Service Contour
 43 dBu F(50,90)
 Principal Community Contour

WWCP-TV Appendix B Facility
 Ch. 8 6.5 kW (MAX-DA) 352 m

Service Contour extended 5 miles
 36 dBu F(50,90) Service Contour

Licensed WWCP-TV Analog Facility
 File # BLCT-19861023KJ
 Ch. 8 166 kW (MAX-DA) 368 m
 56 dBu F(50,50) Grade B Contour

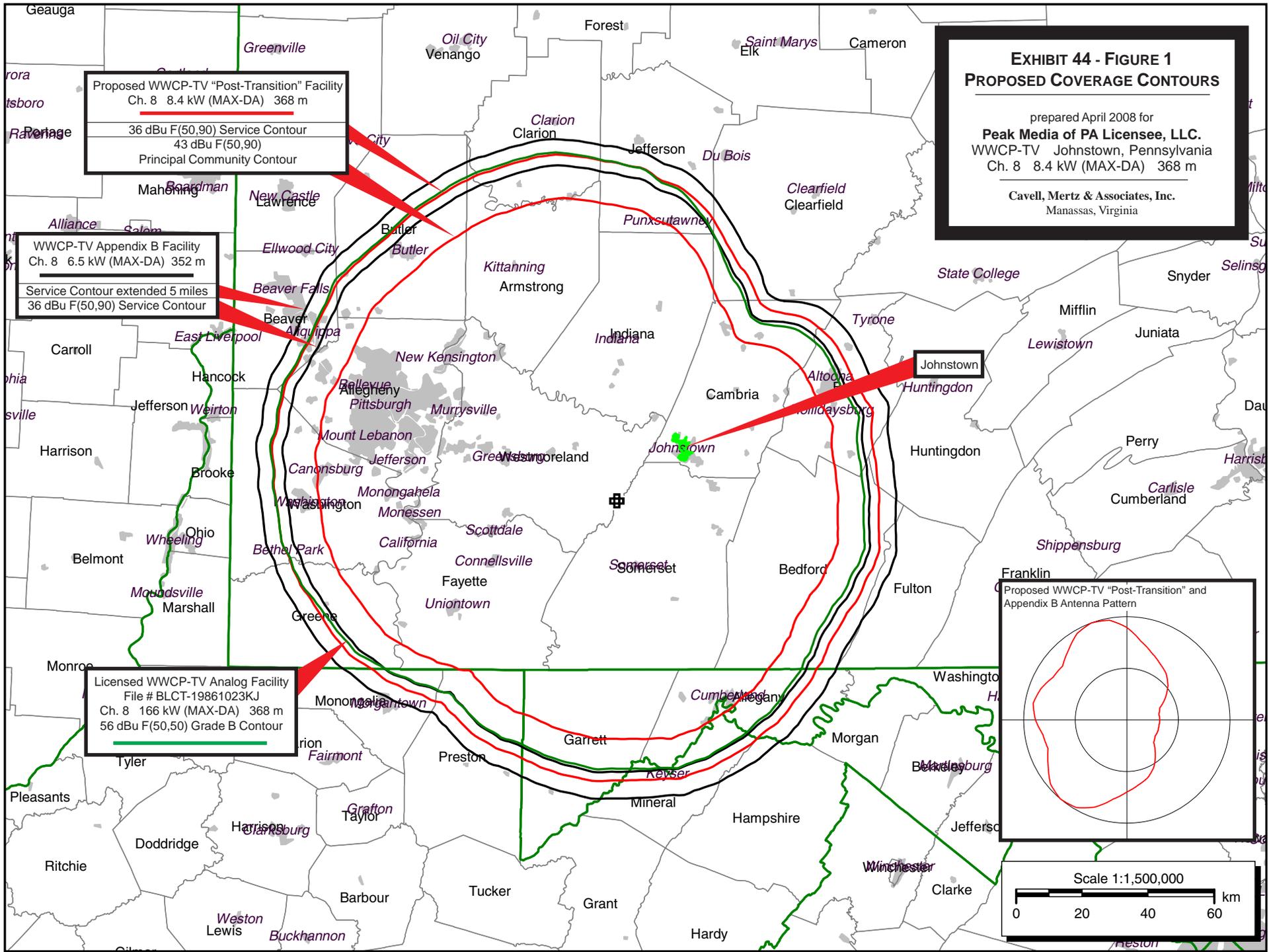
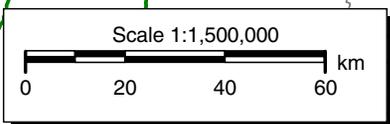
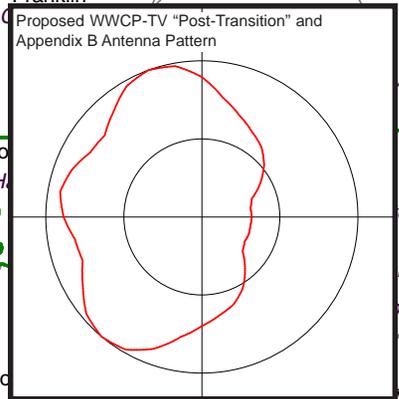


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS

prepared for
Peak Media Of PA Licensee LLC
 WWCP-TV Johnstown, Pennsylvania
 Facility ID 20295
 Ch. 8 8.4 kW 368 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	WJLA-TV	Washington	DC	7,250,000				---No interference---	
7	WTRF-TV	Wheeling	WV	2,373,000	2,373,911	2,830	8,002	5,172	0.22%
8	WNJB	New Brunswick	NJ	16,912,000				---No interference---	
8	WICZ-TV	Binghamton	NY	751,000				---No interference---	
8	WJW	Cleveland	OH	3,964,000	3,964,910	61,676	63,572	1,896	0.05%
8	WLIO	Lima	OH	995,000				---No interference---	
8	WGAL	Lancaster	PA	4,088,000	4,088,145	152,951	153,004	53	0.00%
8	WVNS-TV	Lewisburg	WV	590,000	590,145	10,192	10,233	41	0.01%
9	WUSA	Washington	DC	7,238,000				---No interference---	
9	WTOV-TV	Steubenville	OH	2,829,000	2,829,971	1,951	4,672	2,721	0.10%