

Exhibit 40 - Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM

prepared for
Gannett Pacific Corporation
WBIR-DT Knoxville, Tennessee
Facility ID 46984
Ch. 31 840 kW 530 m

Gannett Pacific Corporation (“*Gannett*”) is the licensee of analog station WBIR-TV Channel 10, Knoxville, Tennessee. *Gannett* proposes herein to modify the existing construction permit for the paired WBIR-DT (BPCDT-20000501ADC) to specify a different transmitter facility to be located at a nearby authorized tower site currently under construction.

The proposed antenna system is non-directional in the horizontal plane and will operate with an effective radiated power (“ERP”) for WBIR-DT of 840 kilowatts. The new antenna support structure is currently under construction and its Antenna Structure Registration number is 1052156.

The proposed non-directional effective radiated power exceeds that of the DTV reference facility as established in Section 73.622(f)(1) of the FCC Rules. Accordingly, pursuant to Section 73.622(f)(5) of the FCC Rules, an interference study is supplied herein per Section 73.623(c); see **Exhibit 41 - Statement B**. As shown therein, it is believed that the instant proposal satisfies the FCC’s published interference criteria.