

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM

prepared for
Sunflower Broadcasting, Inc.
KBSL-TV Goodland, KS
Facility ID: 66416
Ch. 10 26.5 kW 299 m

Sunflower Broadcasting, Inc. (“*SBI*”) is the licensee of analog television station KBSL-TV, Channel 10, Goodland, KS (see BMLCT-20040826AAI). *SBI* herein respectfully requests authorization to construct its post-transition facility for KBSL-TV in accordance with 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 due to the limitations imposed by the allotment’s directional antenna pattern. The facility proposed herein will commence operation promptly following the Congressionally mandated termination on February 17, 2009 of analog transmission on Channel 10.

The location proposed for KBSL-TV’s post-transition facility is the currently authorized KBSL-TV site. The tower is registered with the FCC, Antenna Structure Registration Number 1031891. *SBI* will employ the currently licensed analog Channel 10 antenna, a non-directional, RCA TF12AH, for the proposed KBSL-TV post-transition digital facility.

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 replication of the Grade B contour while not extending past the “5 mile” extension of the Appendix B service contour. Further, as shown in **Exhibit 44 – Table I**, the facility complies with the Commission imposed 0.5% new interference limit. As demonstrated thereon, the proposed facility complies with the Commission stated “Filing Freeze Waiver” policy.

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 *Seventh Report and Order and Eighth Further Notice of Proposed Rule Making*, MB Docket No. 87-268, FCC 07-138, released August 6, 2007.

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Exhibit 44-Figure 1 also provides the proposed facility's principal community coverage contour. As demonstrated therein, the principal community of Goodland, KS is predicted to receive the enhanced signal level as required in §73.625(c) of the Commission's Rules.

The proposed KBSL-TV site is located more than 400 km from the nearest points on the Canadian and Mexican borders and does not require international coordination. The nearest FCC monitoring station is at Grand Island, NE, at a distance of 311.3 km from the proposed site. The proposed ERP of 26.5 kW on Channel 10 is significantly below that of the coordinated 316 kW analog facility currently in operation. Further, the proposed ERP is below that specified in §73.1030(c)(3)(iv) that would suggest consideration of the monitoring station. The proposed site is also located outside the area specified in §73.1030(b)(1)(iv). Thus, coordination with respect to the Table Mountain Receiving Zone 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.

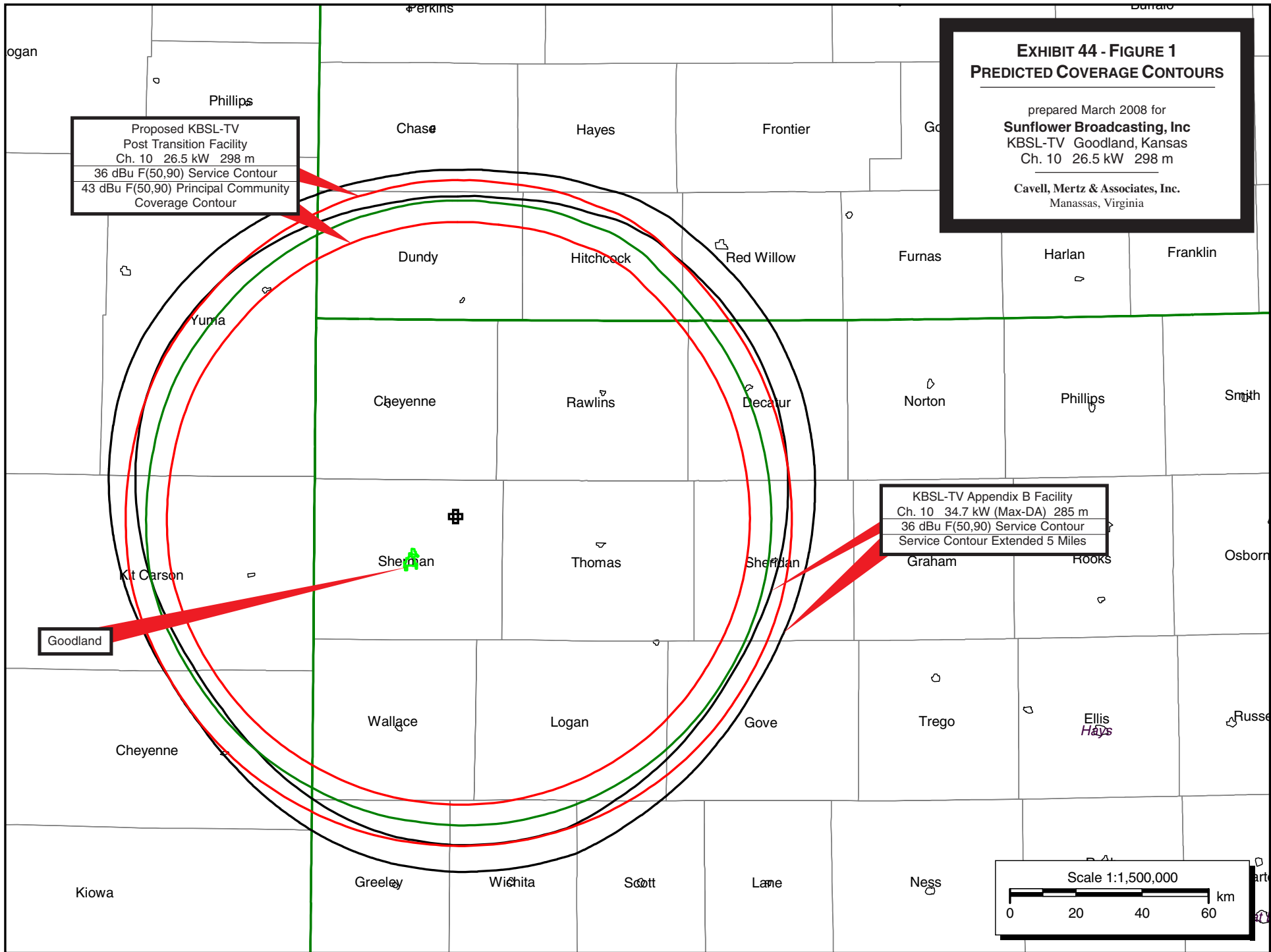


EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS

prepared March 2008 for
Sunflower Broadcasting, Inc
KBSL-TV Goodland, Kansas
Ch. 10 26.5 kW 298 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS

prepared for

Sunflower Broadcasting, Inc.

KBSL-TV Goodland, KS

Facility ID: 66416

Ch. 10 26.5 kW 299 m

<u>Channel</u>	<u>Affected Station</u>	<u>City</u>	<u>State</u>	<u>7th R&O</u>	<u>Calculated</u>	<u>Interference</u>	<u>Interference</u>	<u>Population</u>	<u>New</u>
				<u>Table Baseline</u>	<u>Baseline</u>	<u>Population</u>	<u>Population</u>		
				<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>Difference</u>	<u>Interference</u>
9	KPNE-TV	North Platte	NE	66,000			--No interference --		
10	KKTV	Colorado Springs	CO	959,000	959,551	1,128,161	1,128,291	130	0.01%
10	KAKE-TV	Wichita	KS	743,000			--No interference --		
10	KOLN	Lincoln	NE	887,000			--No interference --		
11	KSNG	Garden City	KS	136,000			--No interference --		