

Exhibit 44 – Statement A  
**NATURE OF THE PROPOSAL**  
**PROPOSED ANTENNA SYSTEM**  
prepared for  
**Gannett Pacific Corporation**  
WBIR-TV Knoxville, Tennessee  
Facility ID: 46984  
Ch. 10 40.9 kW 546 m

Gannett Pacific Corporation (“*Gannett*”) is the licensee of analog television station WBIR-TV, Channel 10, Knoxville, Tennessee (see BLCT-19800109KE). *Gannett* is also currently authorized to construct the post-transition digital facility for WBIR-TV on Channel 10 (“CP”, BPCDT-20080312AEG). With the lifting of the filing freeze<sup>1</sup>, *Gannett* herein proposes to modify its CP to specify a maximized post-transition operation for WBIR-TV from an existing tower (see Antenna Structure Registration Number 1042631). 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 Knoxville, Tennessee 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 1,476,899 persons, which is 105.8 percent of the 1,396,000 persons that are predicted to receive interference free service from the Appendix B facility<sup>2</sup>.

The proposed antenna is a RCA TW12A-10R which is non-directional in the horizontal plane and is horizontally polarized with 0.64° 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 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

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<sup>1</sup> 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.

<sup>2</sup> 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

Exhibit 44 – Statement A

(Page 2 of 2)

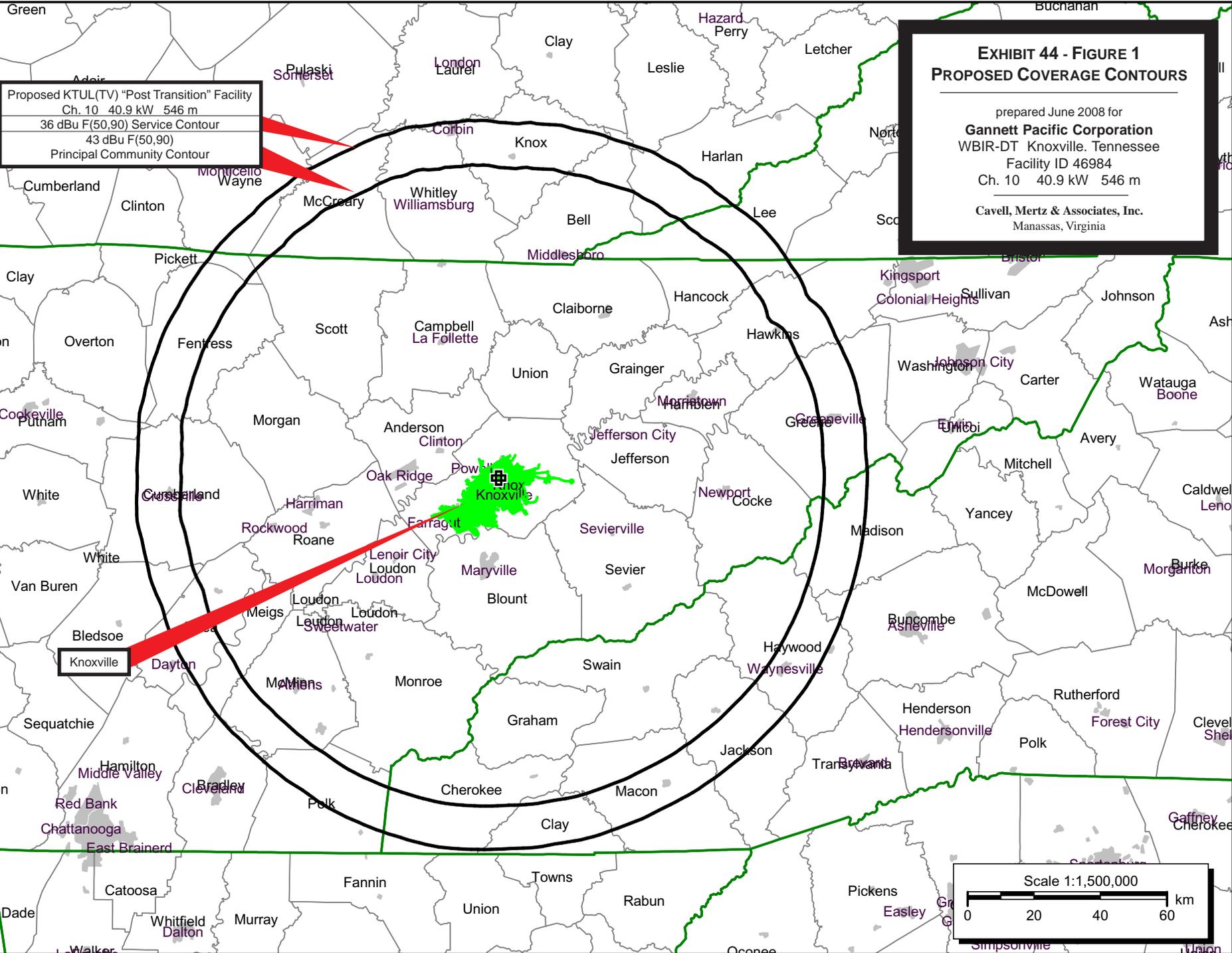
Periodic Review<sup>3</sup> is caused to affected stations by the post-transition WBIR-TV operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**.

The proposed WBIR-TV digital Channel 10 site is located more than 400 km from the nearest point on the international border with Canada and does not require international coordination. The nearest FCC monitoring station is Powder Springs, GA at a distance of 248 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. There are no AM stations located within 3.2 km of the existing tower site.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.

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<sup>3</sup> 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.



Proposed KTUL(TV) "Post Transition" Facility  
 Ch. 10 40.9 kW 546 m  
 36 dBu F(50,90) Service Contour  
 43 dBu F(50,90)  
 Principal Community Contour

**EXHIBIT 44 - FIGURE 1**  
**PROPOSED COVERAGE CONTOURS**

prepared June 2008 for  
**Gannett Pacific Corporation**  
 WBIR-DT Knoxville, Tennessee  
 Facility ID 46984  
 Ch. 10 40.9 kW 546 m

Cavell, Mertz & Associates, Inc.  
 Manassas, Virginia

Scale 1:1,500,000  
 0 20 40 60 km

Exhibit 44 - Table I  
**INTERFERENCE STUDY RESULTS**

prepared for  
**Gannett Pacific Corporation**  
 WBIR-TV Knoxville, Tennessee  
 Facility Id: 46984  
 Ch. 10 40.9 kW 546 m

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>7th R&amp;O Table Baseline (2000 Census)</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population 7th R&amp;O facility (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference Population</u>	<u>Percentage</u>
9	WNTV(TV)	Greenville, SC	BLEDT-20041123AKQ	1,753,000			---	No Interference	---
9	WNTV(TV)	Greenville, SC	Reference	1,753,000			---	No Interference	---
9	WTV(TV)	Chattanooga, TN	BMPCDT-20080221AAI	1,022,000	1,043,261	44,264	45,335	1,071	0.103 %
9	WTV(TV)	Chattanooga, TN	Reference	1,022,000	1,022,716	47,523	50,162	2,639	0.258 %
10	WBIQ(TV)	Birmingham, AL	Reference	1,363,000	1,363,777	71,001	71,001	0	0.000 %
10	WBIQ(TV)	Birmingham, AL	BPEDT-20080306ABA	1,363,000	1,363,290	70,611	70,611	0	0.000 %
10	WXIA-TV	Atlanta, GA	BLCDT-20040302AAO	4,867,000	4,865,846	31,596	41,582	9,986	0.205 %
10	WXIA-TV	Atlanta, GA	Reference	4,867,000	4,865,846	31,596	41,582	9,986	0.205 %
10	WCPO-TV	Cincinnati, OH	BLCDT-20041230ACA	3,082,000	3,037,366	13,875	14,286	411	0.014 %