

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
KXTV, Inc.
KXTV(TV) Sacramento, California
Facility ID: 25048
Ch. 10 22 kW 612 m

KXTV, Inc. (“*KXTV*”) is the licensee of analog television station KXTV(TV), Channel 10, Sacramento, California. (see BLCT-20001024ABG). *KXTV* herein respectfully requests authorization to construct its post-transition facility for KXTV(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. *KXTV* proposes to locate its post-transition facility for KXTV(TV) at the existing Channel 10 analog site and to employ the existing Channel 10 non-directional antenna. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 10 and pre-transition digital operations on Channel 61.

The location proposed for KXTV(TV)’s post-transition facility is the currently authorized KXTV(TV) analog site. The tower is registered with the FCC, Antenna Structure Registration Number 1011404. *KXTV* will employ the currently authorized analog Channel 10 non-directional antenna for the proposed KXTV(TV) post-transition digital facility. The antenna is a Dielectric TCL-12A10 which is considered non-directional, with 0.5° of electrical beam tilt. Circular polarization will be employed.

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 comes as close as possible to achieving replication of the Grade B contour using the existing KXTV(TV) Channel 10 non-directional

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, Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 07-138, released August 6, 2007.

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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 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 Sacramento, California is predicted to receive the enhanced signal level as required in §73.625(a) of the Commission’s Rules.

The proposed KXTV(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 Livermore, California, at a distance of 61.3 km from the proposed site. The proposed ERP of 22 kW on Channel 10 is significantly below that of the coordinated 314 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. 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.

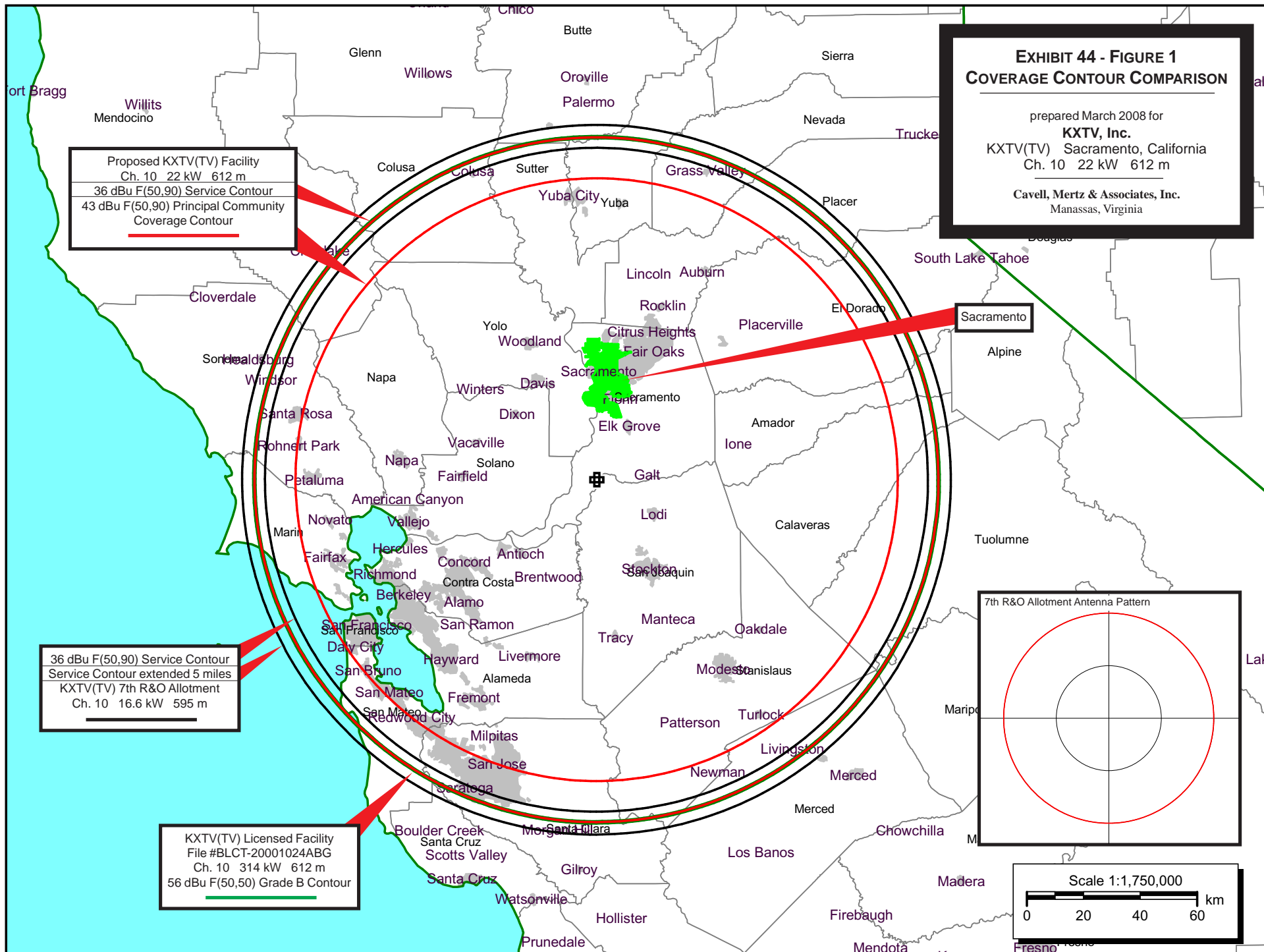


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS

prepared for

KXTV, Inc.

KXTV(TV) Sacramento, California

Facility ID: 25048

Ch. 10 22 kW 612 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>
9	KVIE(TV)	Sacramento	CA	5,291,000	5,291,780	852,583	852,465	-118	-0.0022%
9	KOLO-TV	Reno	NV	660,000	660,528	21,318	21,318	0	0.0000%
10	KERO-TV	Bakersfield	CA	841,000		-- -No interference - - -			
11	KNSO(TV)	Merced	CA	1,691,000		-- -No interference - - -			