

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

prepared for

Detroit Free Press, Inc.

WUSA(TV) Washington, D.C.

Facility ID: 65593

Ch. 9 9.55 kW 235 m

Detroit Free Press, Inc. (“*DFPI*”) is the licensee of analog television station WUSA(TV), Channel 9, Washington, D.C. (see BMLCT-19981223KE). *DFPI* herein respectfully requests authorization to construct its post-transition facility for WUSA 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 due to the limitations imposed by the allotment’s directional antenna³ pattern. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 9 and pre-transition digital operations on Channel 34.

The location proposed for WUSA’s post-transition facility is the currently authorized WUSA(TV) site. The tower is registered with the FCC, Antenna Structure Registration Number 1051670. *DFPI* will employ the currently authorized analog Channel 9 non-directional antenna for the proposed WUSA post-transition digital facility. The antenna is a Dielectric THP-0-10S-2-R which is considered non-directional in the horizontal plane with 0.5° 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 will not achieve replication of the Grade B contour nor does it extend past the “5 mile” extension of the Appendix B service contour. 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 *Seventh Report And Order And Eighth Further Notice Of Proposed Rule Making*, MB Docket No. 87-268, FCC 07-138, released August 6, 2007.

³ For *DFPI* to employ the existing Channel 9 non-directional antenna and maintain the service contour within the bounds of the Appendix B facility would require an effective radiated power of 4.3 kW and a loss of service to over 170,000 persons.

Exhibit 44 – Statement A

(Page 2 of 2)

only limitation is the Commission imposed 0.5% new interference limit⁴. **Exhibit 44-Table I** provides the results of the interference study. As demonstrated thereon, the proposed facility complies with the Commission stated “Filing Freeze Waiver” policy.

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

The proposed WUSA 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 Laurel, MD, at a distance of 32.7 km from the proposed site. The proposed ERP of 9.55 kW on Channel 9 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(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.

⁴ It should be noted that the interference limitation is towards WBPH-DT, Ch. 9, Bethlehem, PA. WBPH-DT was permitted to change its DTV channel assignment under the more relaxed 2%/10% de-minimis interference limitation previously permitted.

EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS

prepared March 2008 for
Detroit Free Press, Inc.
 WUSA(TV) Washington, DC
 Ch. 9 9.55 kW 235 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Licensed WUSA(TV) Analog Facility
 File # BMLCT-19981223KE
 Ch. 9 316 kW 235 m
 56 dBu F(50,50) Grade B Contour

Proposed WUSA "Post-Transition" Facility
 Ch. 9 9.55 kW 235 m
 36 dBu F(50,90) Service Contour
 43 dBu F(50,90)
 Principal Community Contour

Service Contour extended 5 miles
 36 dBu F(50,90) Service Contour
 WUSA-DT Appendix B Facility
 Ch. 9 17 kW (MAX-DA) 254 m

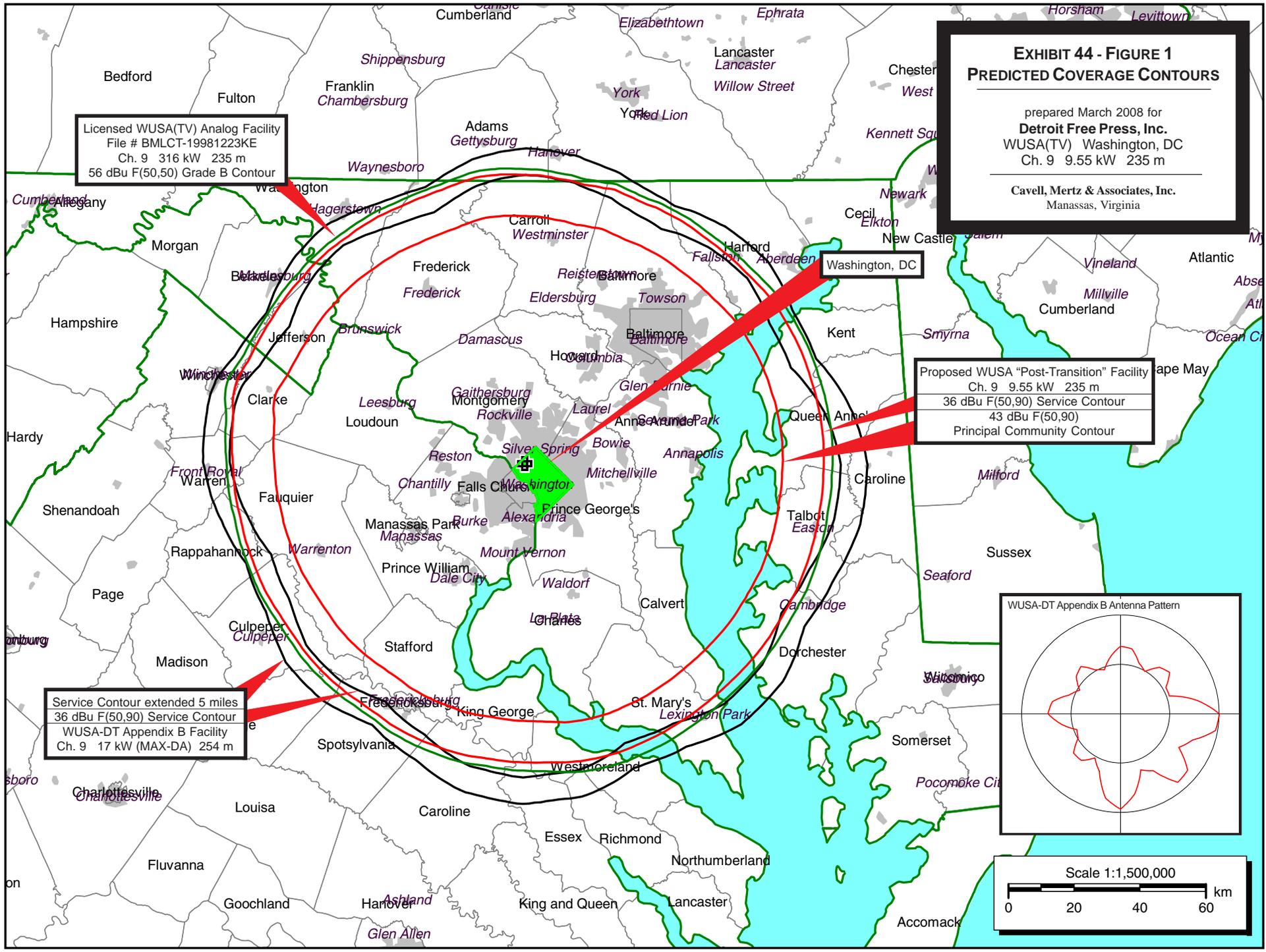
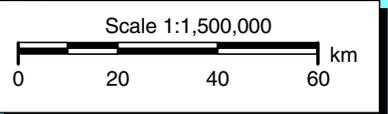
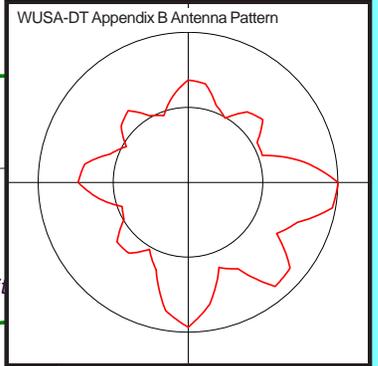


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS

prepared for

Detroit Free Press, Inc.

WUSA(TV) Washington, D.C.

Facility ID: 65593

Ch. 9 9.55 kW 235 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>
8	WWCP-TV	Johnstown	PA	2,534,000		- - -No interference - - -			
8	WGAL	Lancaster	PA	3,313,000	3,313,601	86,016	86,446	430	0.01%
9	WSKY-TV	Manteo	NC	1,725,000	1,725,558	88	6	-82	0.00%
9	WTOV-TV	Steubenville	OH	2,829,000		- - -No interference - - -			
9	WBPH-TV	Bethlehem	PA	5,342,000	5,342,522	488,580	511,673	23,093	0.43%
10	WHTM-TV	Harrisburg	PA	2,185,000		- - -No interference - - -			