

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
WSET Incorporated
WSET-TV Lynchburg, Virginia
Facility ID: 73988
Ch. 13 22 kW 625 m

WSET Incorporated (“*WSET*”) is the licensee of analog television station WSET-TV, Channel 13, Lynchburg, Virginia (see BLCT-19820202KE) and pre-transition digital Channel 34 (BLC DT-20050824ABZ). *WSET* herein respectfully requests authorization to construct its post-transition facility for WSET-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. *WSET* proposes to locate its post-transition facility for WSET-TV at the existing Channel 13 analog site, and to employ a new Channel 13 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 13 and pre-transition digital operations on Channel 34.

The location proposed for WSET-TV’s post-transition facility is the currently authorized WSET-TV analog site. The tower is registered with the FCC, Antenna Structure Registration Number 1016546. *WSET* will employ a new Channel 13 non-directional antenna for the proposed WSET-TV post-transition digital facility. The antenna is an ERI ATW9V3-ETO-13, which is non-directional in the horizontal plane with 0.75° of electrical beam tilt. The proposed antenna is elliptically polarized with 25% vertical polarization. The maximum horizontally polarized effective radiated power (“ERP”) is 22 kW and the maximum vertically polarized ERP is 5.5 kW. The vertically polarized component of the proposed antenna does not exceed that of the horizontally polarized component. **Exhibit 44-Figure 1** provides the vertical plane (elevation) relative filed pattern for the proposed WSET antenna.

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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Exhibit 44 - Figure 2 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 WSET-TV Channel 13 directional 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 2 also provides the proposed facility’s principal community coverage contour. As demonstrated therein, the principal community of Lynchburg, Virginia 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 1,220,351 persons which is 104.4 percent of the 1,169,000 persons that are predicted to receive interference free service from the Appendix B facility.

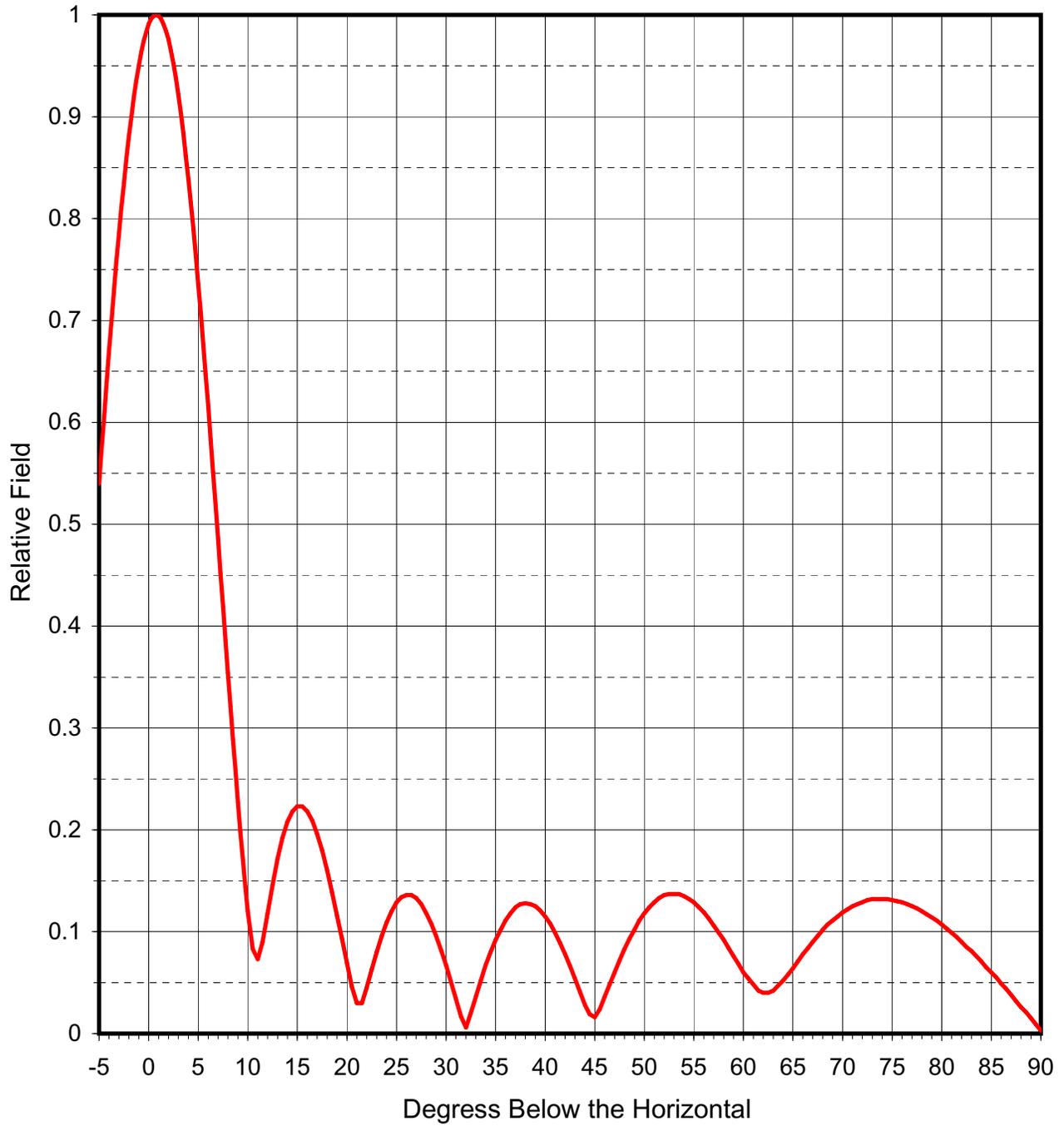
The proposed WSET-TV site is located more than 400 km from the nearest points on the Canadian and Mexican borders and does not require international coordination. The nearest FCC monitoring station is at Laurel, Maryland, at a distance of 320.7 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. 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.

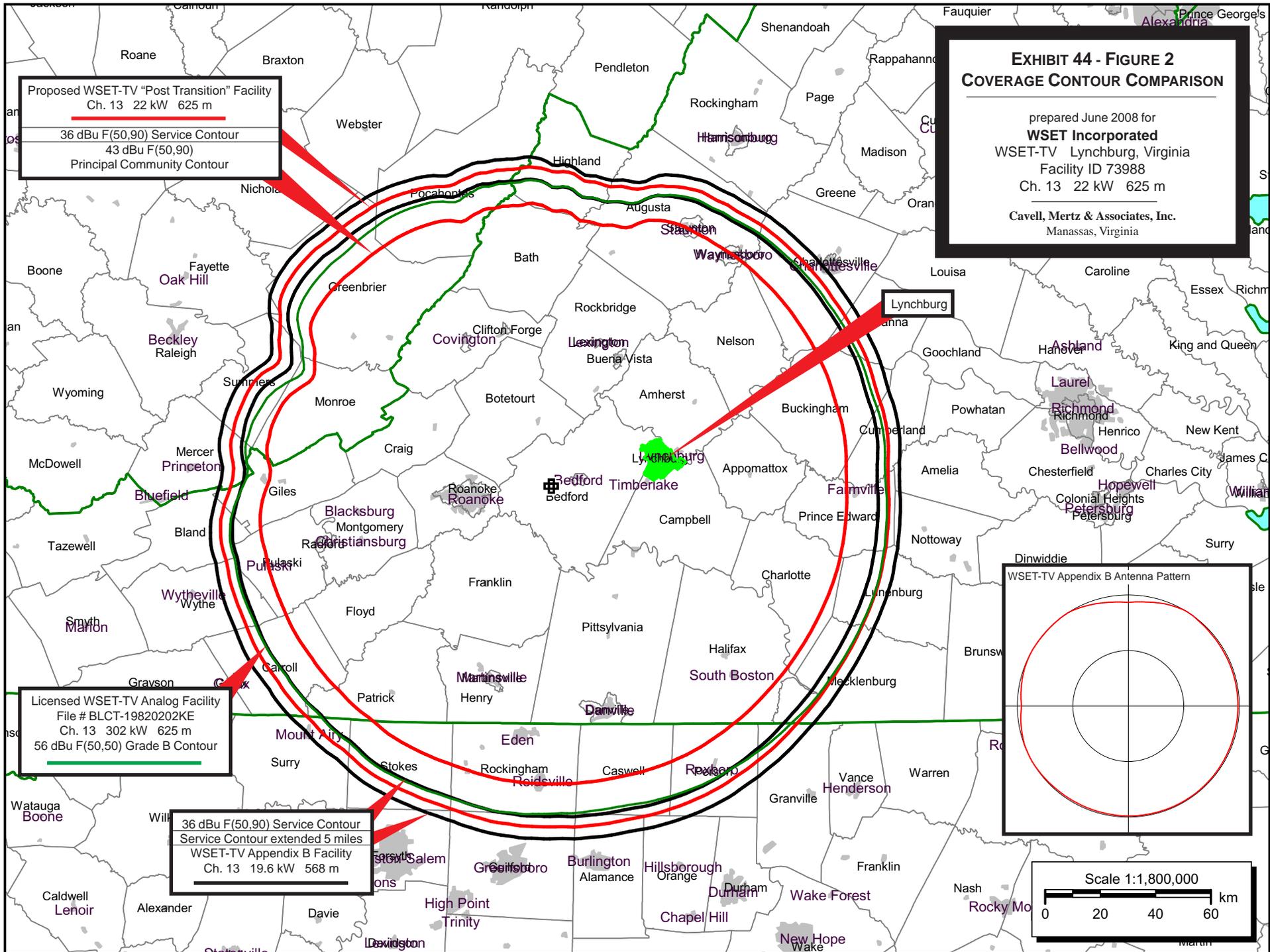
Thus, this proposal is believed to be in compliance with the current Commission’s Rules and policy with respect to allocation matters.

EXHIBIT 44 - FIGURE 1
ANTENNA VERTICAL PLANE (ELEVATION)
RELATIVE FIELD PATTERN

prepared June 2008 for
WSET Incorporated
WSET-TV Lynchburg, Virginia
Facility ID 73988
Ch. 13 22 kW 625 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia





Proposed WSET-TV "Post Transition" Facility
 Ch. 13 22 kW 625 m

36 dBu F(50,90) Service Contour
 43 dBu F(50,90)
 Principal Community Contour

EXHIBIT 44 - FIGURE 2
COVERAGE CONTOUR COMPARISON

prepared June 2008 for
WSET Incorporated
 WSET-TV Lynchburg, Virginia
 Facility ID 73988
 Ch. 13 22 kW 625 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Licensed WSET-TV Analog Facility
 File # BLCT-19820202KE
 Ch. 13 302 kW 625 m
 56 dBu F(50,50) Grade B Contour

36 dBu F(50,90) Service Contour
 Service Contour extended 5 miles
 WSET-TV Appendix B Facility
 Ch. 13 19.6 kW 568 m

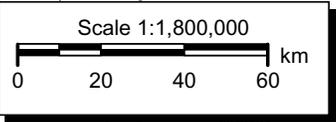
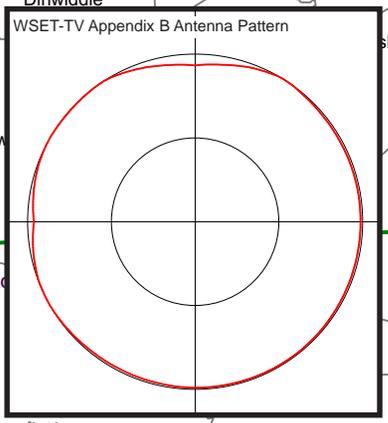


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS

prepared for

WSET Incorporated

WSET-TV Lynchburg, Virginia

Facility ID: 73988

Ch. 13 22 kW 625 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>
12	WWBT	Richmond	VA	1,277,000				--No interference---	
12	WBOY-TV	Clarksburg	WV	584,000				--No interference---	
13	WKYT-TV	Lexington	KY	919,000				--No interference---	
13	WJZ-TV	Baltimore	MD	7,452,000	7,452,977	396,291	396,131	-160	0.00%
13	WLOS	Ashville	NC	2,348,000	2,348,664	49,775	50,195	420	0.02%
13	WSYX	Columbus	OH	2,526,000				--No interference---	
13	WQED	Pittsburgh	PA	2,933,000	2,933,759	38,808	38,808	0	0.00%
13	WBTW	Florence	SC	1,647,000	1,647,515	24,163	25,759	1,596	0.10%
13	WVEC-TV	Hampton	VA	1,937,000	1,937,361	21,580	21,616	36	0.00%
13	WOWK-TV	Huntington	WV	1,025,000	1,025,040	50,440	50,440	0	0.00%