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 22.5 kW 546 m

Gannett Pacific Corporation ("Gannett") is the licensee of analog television station WBIR-TV, Channel 10, Knoxville, Tennessee. (see BLCT-19800109KE). *Gannett* herein respectfully requests authorization to construct its post-transition facility for WBIR-TV in accordance the "Filing Freeze Waiver" policy in the Commission's Third Periodic Review[1]. The proposed facility will, of necessity, extend the noise-limited Appendix B[2] service contour. *Gannett* proposes to locate its post-transition facility for WBIR-TV at the existing Channel 10 analog site 0.35 km distant from the allotment site reference coordinates 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 31.

The location proposed for WBIR-TV's post-transition facility is the currently authorized WBIR-TV analog site. The tower is registered with the FCC, Antenna Structure Registration Number 1042631. *Gannett* will employ the currently authorized analog Channel 10 non-directional antenna for the proposed WBIR-TV post-transition digital facility. The antenna is an RCA TW12A-10R which is considered non-directional in the horizontal plane with 0.64° 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 comes as close as possible to achieving replication of the Grade B contour using the existing WBIR-TV Channel 10 non-directional antenna. Further, the service contour for the proposed facility does not extend past the "5 mile"

[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.

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 Knoxville, Tennessee is predicted to receive the enhanced signal level as required in §73.625(c) of the Commission's Rules.

The proposed WBIR-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 Power Spring, Georgia, at a distance of 248.3 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.

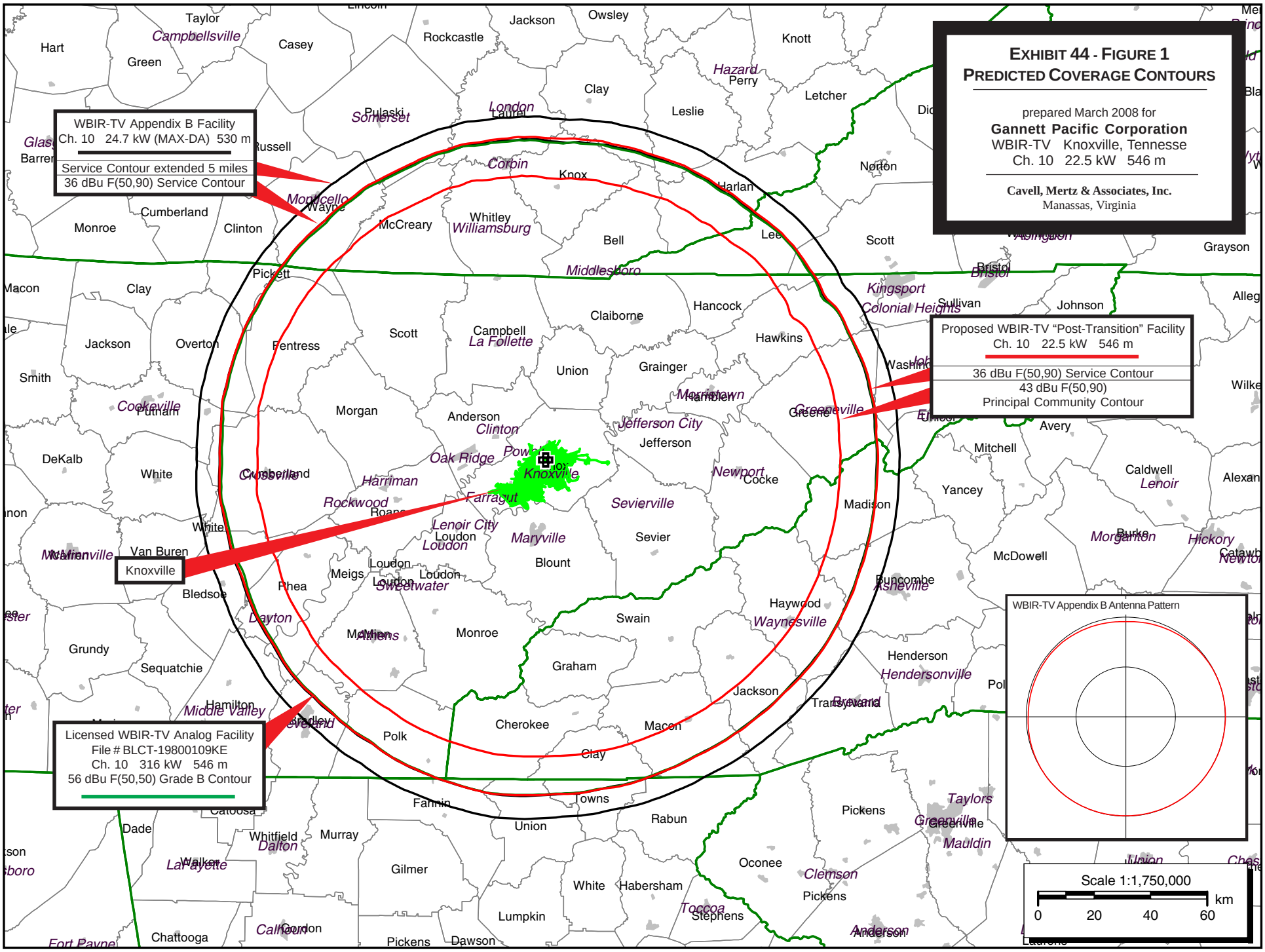
EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS
prepared March 2008 for
Gannett Pacific Corporation
WBIR-TV Knoxville, Tennesse
Ch. 10 22.5 kW 546 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
WBIR-TV Appendix B Facility
Ch. 10 24.7 kW (MAX-DA) 530 m
Service Contour extended 5 miles
36 dBu F(50,90) Service Contour
Proposed WBIR-TV "Post-Transition" Facility
Ch. 10 22.5 kW 546 m
36 dBu F(50,90) Service Contour
43 dBu F(50,90)
Principal Community Contour
Licensed WBIR-TV Analog Facility
File # BLCT-19800109KE
Ch. 10 316 kW 546 m
56 dBu F(50,50) Grade B Contour
WBIR-TV Appendix B Antenna Pattern
Scale 1:1,750,000
0 20 40 60 km
Knoxville
Taylor
Campbellsville
Hart
Green
Casey
Rockcastle
Jackson
Owsley
Knott
Hazard
Perry
Letcher
Clay
Leslie
Somerset
Pulaski
London
Laurel
Corbin
Knox
Harlan
Norton
Monticello
Wayne
Cumberland
Monroe
Clinton
McCreary
Whitley
Williamsburg
Bell
Scott
Grayson
Middlesboro
Bristol
Kingsport
Colonial Heights
Sullivan
Johnson
Pickett
Macon
Clay
Jackson
Overton
Fentress
Scott
Campbell
La Follette
Claiborne
Hancock
Hawkins
Union
Grainger
Smith
Putnam
Cookeville
Morgan
Anderson
Clinton
Jefferson City
Jefferson
Morristown
Greeneville
Avery
Mitchell
DeKalb
White
Crossville
Harriman
Oak Ridge
Knoxville
Newport
Cocke
Caldwell
Lenoir
Yancey
Madison
Rockwood
Farragut
Sevierville
Roane
Lenoir City
Loudon
Maryville
Sevier
Blount
Van Buren
McMinnville
Meigs
Sweetwater
Monroe
Bledsoe
Rhea
Dayton
Athens
Swain
Haywood
Waynesville
Buncombe
Asheville
McDowell
Morganton
Burke
Hickory
Grundy
Sequatchie
Graham
Henderson
Hendersonville
Jackson
Transylvania
Brevard
Hamilton
Middle Valley
Cherokee
Macon
Polk
Clay
Fannin
Towns
Union
Rabun
Pickens
Taylors
Greenville
Mauldin
Dade
Whitfield
Dalton
Murray
Walker
LaFayette
Gilmer
Oconee
Clemson
Pickens
White
Habersham
Lumpkin
Stephens
Toccoa
Gordon
Calhoun
Chattooga
Fort Payne
Pickens
Dawson
Anderson

Exhibit 44 – Table I

INTERFERENCE STUDY RESULTS

prepared for

Gannett Pacific Corporation

WBIR-TV Knoxville, Tennessee

Facility ID: 46984

Ch. 10 22.5 kW 546 m

Channel	Affected Station	City	State	7th R&O Table Baseline (2000 Census)	Calculated Baseline (2000 Census)	Interference Population 7th R&O facility (2000 Census)	Interference Population with Proposal (2000 Census)	Population Difference	New Interference
9	WNTV	Greenville	SC	1,753,000		- - -No interference - - -			
9	WTVC	Chattanooga	TN	1,022,000	1,022,778	47,461	46,990	-471	-0.0461%
10	WBIQ	Birmingham	AL	1,363,000	1,363,878	70,901	70,901	0	0.0000%
10	WXIA-TV	Atlanta	GA	4,867,000	4,867,533	30,074	29,341	-733	-0.0151%
10	WCPO-TV	Cincinnati	OH	3,082,000	3,076,855[1]	28,174	28,216	42	0.0014%
10	WIS	Columbia	SC	1,450,000		- - -No interference - - -			
10	WSMV-TV	Nashville	TN	2,019,000	2,019,644	13,760	13,424	-336	-0.0166%
10	WSWP-TV	Grandview	WV	649,000	6,499,833	13,853	13,853	0	0.0000%
11	WJHL-TV	Johnson City	TN	1,273,000	1,273,856	79,662	79,698	36	0.0028%

[1] We noted a difference between the Appendix B population for WCPO-TV and the calculated value. It is believed that the difference in population data does note materially impact the calculated percentage change in interference given that only 42 new persons receive interference out of over 28,000.