

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
KATV, LLC
prepared for
KATV(TV) Little Rock, Arkansas
Facility ID: 33543
Ch. 22 1000 kW 515 m

KATV, LLC (“*KATV*”) is the licensee of analog television station KATV(TV), Channel 7, Little Rock, Arkansas (see BLCT-1499). *KATV* is also currently authorized to operate its pre- and post-transition facility for KATV(TV) on Channel 22¹ (see “CP”, BPCDT-19991027ABF). As the Commission is aware, the authorized KATV(TV) tower collapsed on January 11, 2008 during tower maintenance in preparation for the transition to digital television. The KATV(TV) Channel 7 analog facility is operating an emergency antenna facility located on Shinall Mountain at reduced power. The Channel 22 digital operation is *off the air*². KATV(TV)’s digital programming is being carried as a secondary channel on another area station’s digital facility.

The Commission recently approved KATV’s application for a new facility to be constructed at the *de facto* “antenna farm” on Shinall Mountain located to the North and West of Little Rock (See BMPCDT-20080408AAS). The instant application proposes to operate from the same 1150 foot tall tower to be built at the Shinall Mountain Site and increase in the effective radiated power (“ERP”) of the new facility to 1000 kW³. The Antenna Structure Registration number of the proposed tower is 1263739.

A conditional land lease for the site has been executed. However, site preparation cannot commence without a grant of a construction permit. An FAA Form 7460-1, *Notice of Proposed Construction or Alteration*, was filed with that agency and a *Determination of No Hazard to Air Navigation* has been issued (see 2008-ASW-3119-OE). The proposed tower has been registered with the Commission with Antenna Structure Registration Number 1263739 being assigned.

¹ The KATV(TV) digital operation is currently authorized to operate pursuant to a Special Temporary Authorization (see BDSTA-20060817ADZ) using a side-mounted antenna pending the termination of analog operation in February 2009 when the antenna would have been *safely* relocated to the top mounted position in accordance with the CP.

² *KATV* has requested a Special Temporary Authorization to for KATV(TV) Channel 22 to remain silent, see BLSTA-20080520ACD.

³ This application is being filed with a request for a waiver of the Commission’s freeze on the filing of applications that increase a station’s authorized service area.

The proposed, top mounted antenna is an ERI ATW27H3-ETO-22H 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 1000 kW and the maximum vertically polarized ERP is 250 kW. The vertically polarized component of the proposed antenna does not exceed that of the horizontally polarized component. Plots providing the antenna vertical plane (elevation) relative field pattern are provided in **Exhibits 44-Figures 1A and B**.

The Shinall Mountain site is approximately 45 kilometers (approximately 28 miles) from KATV’s previously authorized site. As expected, there are predicted areas of gain and loss resulting from the instant proposal using the Commission’s standard propagation method (“curves”). **Exhibit 44 - Figure 2** has been prepared to show the predicted loss and gain areas resulting from the instant proposal. Typically, the area of loss is determined by predicting the location (for digital television facilities) of the service contours for both facilities using the Commission’s standard propagation method (“curves”). The area covered by the authorized facility that is no longer covered by the proposed facility is considered the “loss area”. Likewise, the area covered by the proposed facility that was not covered by the authorized facility is considered the “gain area”. A presentation of the other services within the gain and loss areas is provided in **Exhibit 44 – Figure 3**. **Exhibit 44 – Table I** provides the details of the other stations within the study area when determined by the Commission’s *curves* method. With many of the area major network affiliates clustered on Shinall Mountain, coverage by other stations using the Commission’s curves post-transition in the “loss area” appear somewhat limited.

The curves only consider the terrain between 3.2 and 16.1 kilometers from the transmitter site along eight cardinal radials, which has long been used by the Commission to define coverage, interference, and principal community coverage. This statistical tool has served to aid in the placement of transmitter sites. However, many have confused the curves predicted service contours for a location where the signal simply ends and is unusable. This is not usually the case.

While the curves has long served the Commission in transmitter placement, in today's "computer" environment, more accurate and detailed methods are available. In fact, the Commission has embraced the use of the well known and long accepted Longley-Rice "terrain-dependent" method of propagation prediction for use in the deployment of digital television. The Longley-Rice propagation method determines the signal level based on multiple factors including the actual terrain between the transmitter and receiver. Unlike the curves, which may show less coverage than actually exists and coverage where none exists, Longley-Rice provides a more accurate prediction of the actual coverage by considering all the intervening terrain between the transmitter and receiver.

The attached **Exhibit 44 - Figure 4** provides the predicted terrain limited coverage for the proposed KATV(TV) Channel 22 digital facility from the Shinall Mountain *de-facto* "antenna farm". Also shown are the service contours (determined using the curves) for the authorized and proposed KATV(TV) digital facilities. The Commission defined "loss area" and "gain area" calculated using the curves method are also shown along with a region defined as a "white area"⁴ that is created by the relocation of KATV. As shown, using the color shading (see the legend provided on the map for the predicted signal levels) from the Longley-Rice propagation model⁵, most locations within the "loss area" will receive a significantly *stronger signal* than that predicted by the Commission's curves.

The "loss area" delineated on the map does show some locations where the signal level is below the service contour level of 41 dBμ (blue tinting). Within the curves predicted "loss area" there are 85,217 persons (2000 Census). However, based on the Longley-Rice prediction method, only 594 persons are predicted to receive signal levels below 41 dBμ in the "loss area" as a result of KATV(TV) moving to the Shinall Mountain *de facto* "antenna farm". Throughout the major portion of the curves predicted "loss area", signal levels are well in excess of that required over the principal community.

The FCC defined "white area" is also shown on the map. When KATV relocates, this area is predicted, using the Commission's curves, to have no service post-transition. However,

⁴ A "white area" is defined an area where this is no television service based on the Commission's curves.

⁵ The Longley-Rice propagation model assumes a properly oriented receiving antenna mounted 9.1 meters (30 feet) above ground level as does the Commission's curves.

as demonstrated in **Exhibit 44 - Figure 4**, the defined “white area” is predicted to receive service from a proposed KATV facility well in excess of the service contour level of 41 dBμ. Thus, the curves predicted loss of off air coverage resulting from KATV’s relocation to the Shinall Mountain *de-facto* “antenna farm” becomes significantly less as predicted using the Longley-Rice propagation model.

Likewise, the “gain area” is defined by the curves predicted contours as that area that will receive new coverage from KATV(TV)’s relocation. There are 122,224 persons (2000 Census) within this area. However, using the alternate propagation method and due to the intervening terrain, 106,439 persons are predicted to receive a signal level in excess of 41 dBμ.

Exhibit 44 - Figure 2A provides a map depicting the service contour of the proposed facility. Further, the map also provides the proposed facility’s principal community coverage contour. As demonstrated therein, the principal community of Little Rock, Arkansas is predicted to receive the enhanced signal level as required in §73.625(a) of the Commission’s Rules. Additionally, the nearby city of Pine Bluff, AR, is also wholly contained within the stronger principal community coverage contour. As shown in **Exhibit 44 – Figure 4**, using the Longley-Rice propagation method a signal level in excess of 80 dBμ is predicted in Pine Bluff. This is over 32 dB above the required signal level for principal community coverage.

Employing the methods set forth in the Commission’s OET Bulletin No 69 (“OET-69”), the proposed KATV(TV) Channel 22 facility provides post-transition interference free coverage to 1,121,692 persons. This represents a modest 3.2% increase in the 1,087,397 persons that are predicted to receive interference free coverage from the CP/Appendix B facility.

In the mid 1960’s when the existing KATV transmitter site was constructed, off air reception was the only method for viewing television programs. Today, cable television systems and direct to home satellite services provide local programming to many locations in place of the traditional off air reception. Using cable/satellite penetration data obtained by station personnel from the A.C. Nielsen Company, the number of persons using an alternate method of television reception (cable or satellite) was determined on a county by county basis within the *curves* predicted loss area. As shown in **Exhibit 44 - Table II**, there are 85,217

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persons within the defined “loss area”. Of those persons, 78,509 employ an alternate method of television reception which translates into 92.1% cable/satellite penetration⁶. Likewise, as shown in **Exhibit 44 – Table III** there are 122,224 persons within the defined “gain area”. Of those persons, 109,352 employ an alternate method of television reception which translates into 89.5% cable/satellite penetration. Within the defined “white area” there are 3,475 persons. 3,262 persons employ an alternate method of television reception (93.9% cable/satellite penetration). A county by county breakdown of the population in the “white area” is provided in **Exhibit 44 - Table IV**.

Thus, using the real world, Longley-Rice propagation method, the proposed relocation of KATV(TV) to the Shinall Mountain *de facto* “antenna farm” is predicted to provide a signal level below 41 dBμ to only 594 persons within the Commission defined “loss area”. An area predicted to receive no service (“white area”) where KATV formerly provided service, is predicted to receive adequate signal levels. Further, cable/satellite penetration within this “white area” is 93.9%. It is believed that such conditions mitigate any concerns of coverage loss resulting from KATV(TV)’s relocation.

The proposed 1000 kW ERP exceeds the maximum permitted for the proposed antenna height above average terrain (“HAAT”) of 515 meters currently permitted by §73.622(f)(8)(i). However, §73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the station having the largest coverage area within the same market. In this case, the largest service area is that of a licensed digital facility for KTHV-DT (Ch. 12, Little Rock, Arkansas, 1.03 km distant, 55 kW ERP / 518.7 meters HAAT, BLCDDT-20041029AIX). The area within the proposed KATV-DT 41 dBμ contour is 44,124 square kilometers, which does not exceed the 47,920 square kilometers of area within the authorized KTHV-DT 36 dBμ contour. The attached **Exhibit 44 - Figure 5** is a map that depicts the coverage contours for these facilities. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission’s Rules.

A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission’s Office of Engineering

⁶ When the 92.1% cable/satellite penetration value is applied the 594 persons within the loss area (as determined using the Longley-Rice propagation method to receive signal level below 41 dBμ) only 47 persons will be impacted.

and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). The interference study examined the net change in interference as experienced by other stations that would result from the proposed facility (in lieu of the reference KATV CP). All stations considered in this study, including Class A television facilities, are listed in **Exhibit 44 – Table V**. The results of the interference study, also summarized in **Table V**, indicate that any additional interference to these stations meets the Commission’s 0.5% new interference limit regarding DTV proposals.

The proposed KATV(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 Powder Spring, Georgia, at a distance of 722.1 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 1A
ANTENNA VERTICAL PLANE (HPOL ELEVATION)
RELATIVE FIELD PATTERN

prepared June 2008 for
KATV, LLC.
KATV(TV) Little Rock, Arkansas
Facility ID 33543
Ch. 22 4.95 kW 515 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

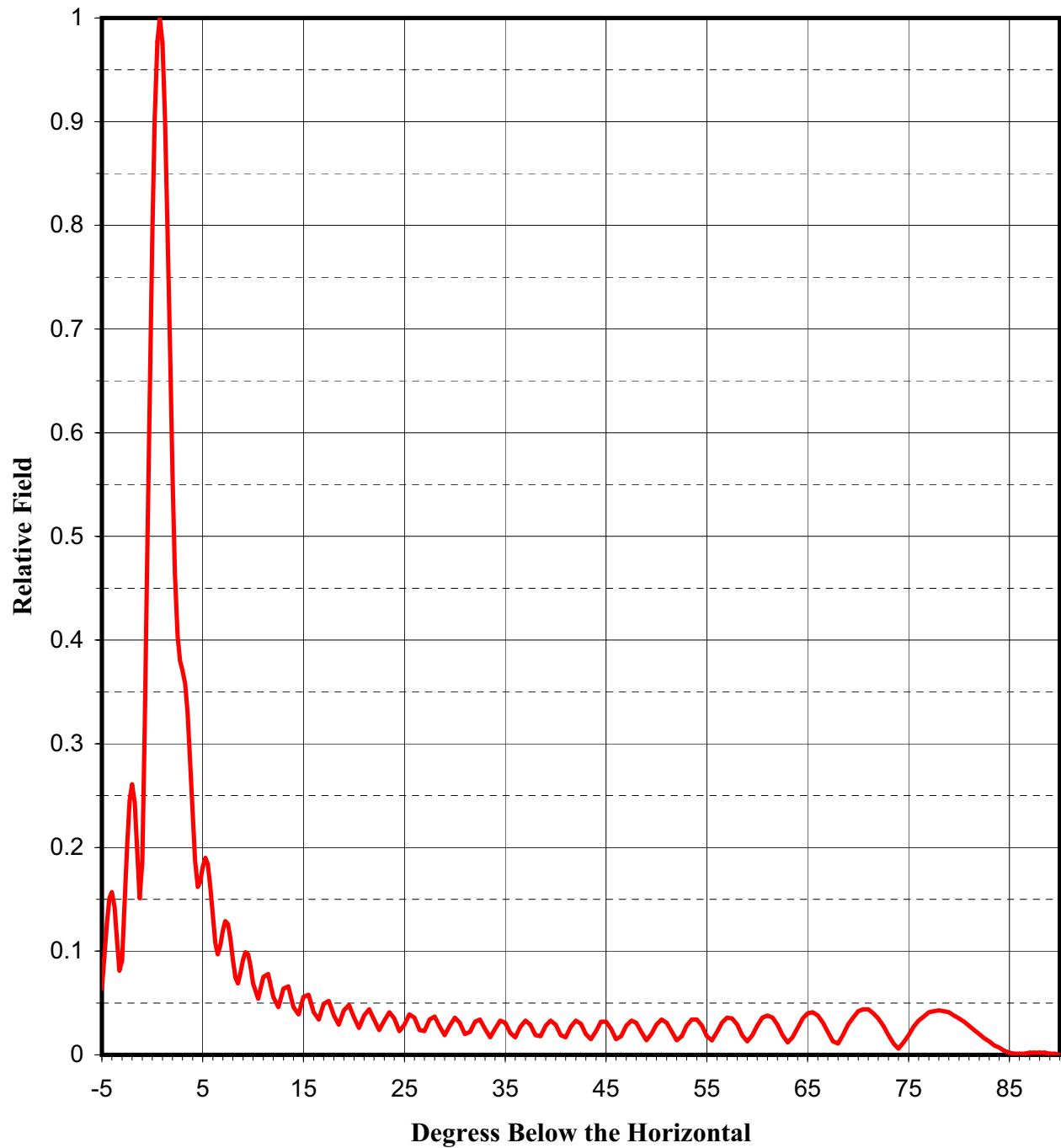


EXHIBIT 44 - FIGURE 1B
ANTENNA VERTICAL PLANE (VPOL ELEVATION)
RELATIVE FIELD PATTERN

prepared June 2008 for
KATV, LLC.
KATV(TV) Little Rock, Arkansas
Facility ID 33543
Ch. 22 4.95 kW 515 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

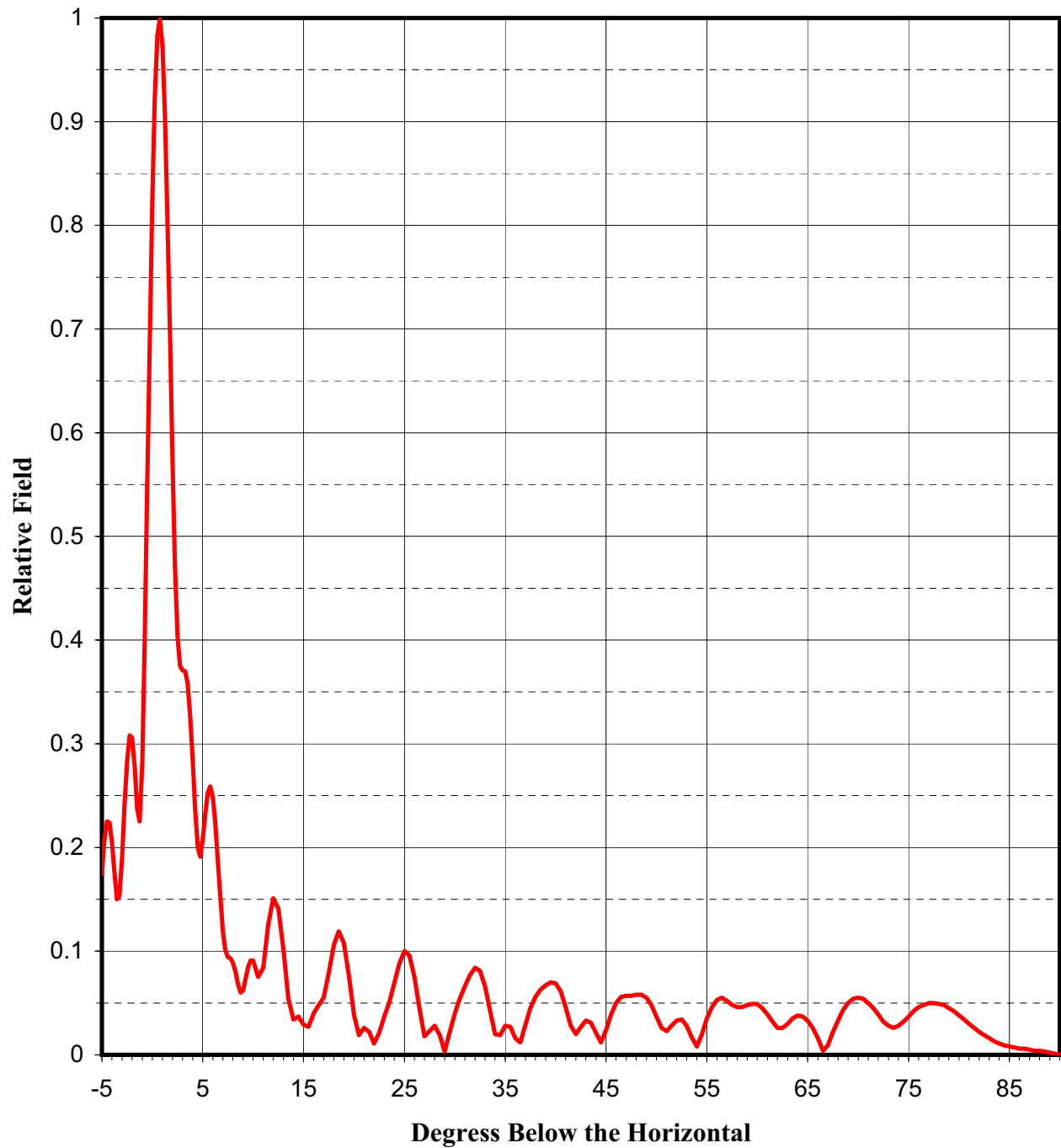


Exhibit 44 – Table I
SUMMARY OF ALTERNATE DIGITAL TELEVISION SERVICES
 prepared for
KATV, LLC
 KATV(TV) Little Rock, Arkansas
 Facility ID 33543
 Ch. 22 1000 kW 515 m

Service Contour

Facility	Area		Population		Households	
	(sq. km)	(% of authorized)	(2000 Census)	(% of authorized)	(2000 Census)	(% of authorized)
KATV CP	42,700.2	---	1,085,708	---	426,266	---
KATV Proposed	41,778.8	97.8%	1,122,715	103.4%	440,766	103.4%
KATV Loss	10,880.2	---	85,217	---	33,300	---
KATV Gain	9,958.8	---	122,224	---	47,800	---
KATV Common	31,820.0	---	1,000,491	---	392,966	---

Alternate Services in Loss Area

		Proposed Service Contour Loss Area			
		Area		Population	
		(sq. km)	(% of loss total)	(2000 Census)	(% of loss total)
Total Area/Population		10,880.2	---	85,217	---
Number of other services	5 or more	5,732.7	52.7%	60,077	70.5%
	4	1,421.0	13.1%	10,767	12.6%
	3	1,248.5	11.5%	3,747	4.4%
	2	620.2	5.7%	4,063	4.8%
	1	787.2	7.2%	3,471	4.1%
	0	1,071.1	9.8%	3,092	3.6%

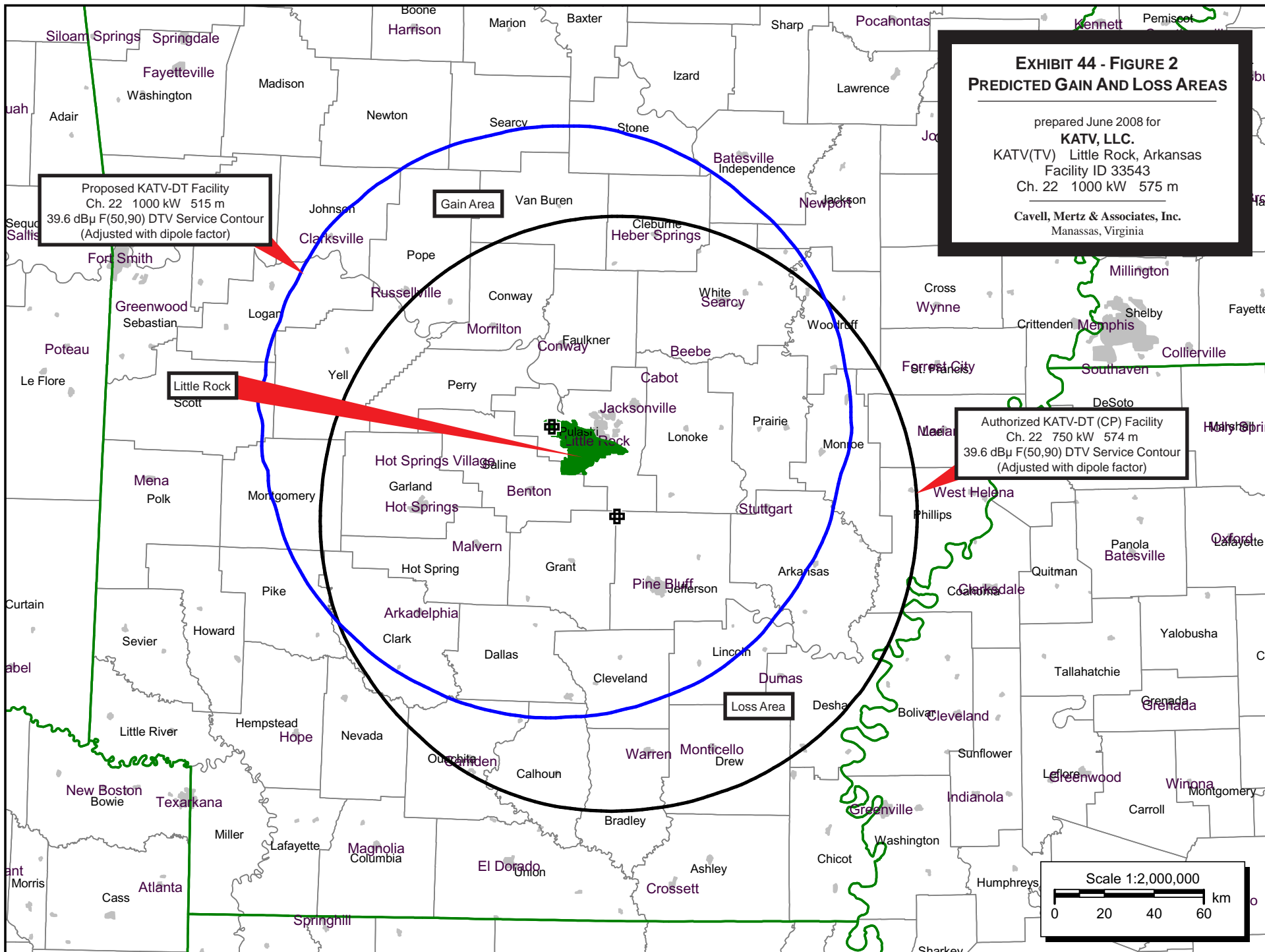
Alternate Services in Gain Area

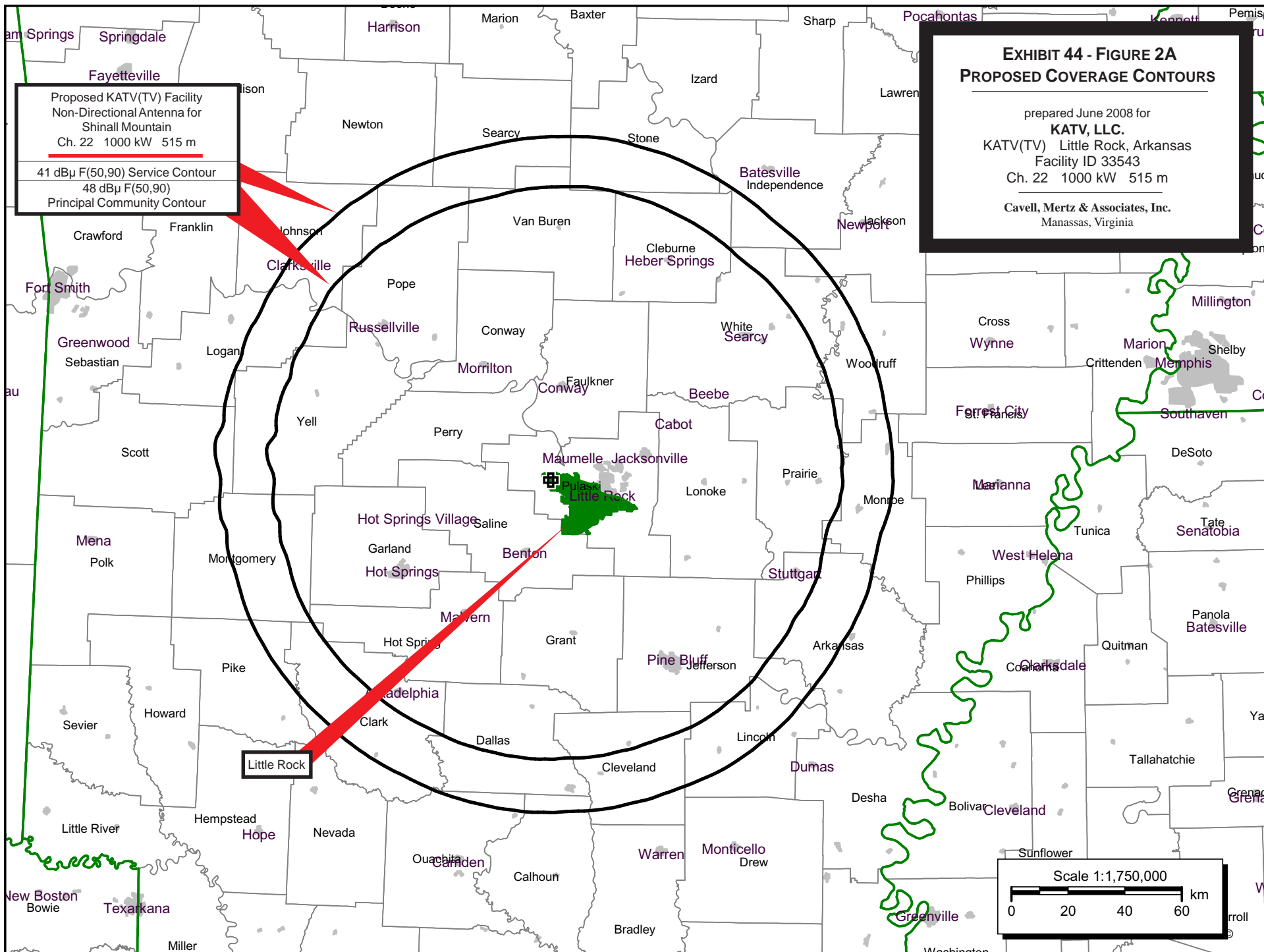
		Proposed Service Contour Gain Area			
		Area		Population	
		(sq. km)	(% of gain total)	(2000 Census)	(% of gain total)
Total Area/Population		9,958.8	---	122,224	---
Number of other services	5 or more	3,479.6	32.0%	71,816	84.3%
	4	3,332.0	30.6%	29,962	35.2%
	3	2,773.3	25.5%	19,162	22.5%
	2	374.2	3.4%	1,284	1.5%
	1	0	0.0%	0	0.0%
	0	0	0.0%	0	0.0%

Note: The population within the contours shown herein were determined using the Commission's curves contour prediction method.

Exhibit 44 – Table I
SUMMARY OF ALTERNATE DIGITAL TELEVISION SERVICES
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<u>Call Sign</u>	<u>Channel</u>	<u>City, State</u>	<u>Facility ID</u>	<u>File Number</u>
KAFT-DT	9	Fayetteville, AR	2767	BLEDT-20041213ABJ
KAIT-DT	9	Jonesboro, AR	13988	BLCDT-20030729AGW
KARK-DT	32	Little Rock, AR	33440	BPCDT-19990614KE
KASN-DT	39	Pine Bluff, AR	41212	BLCDT-20020904AAF
KEJB-DT	43	El Dorado, AR	84164	BPCDT-20080304ACL
KEMV-DT	13	Mountain View, AR	2777	BLEDT-20060623ABO
KETG-DT	13	Arkadelphia, AR	2768	BLEDT-20040608AAX
KETS-DT	5	Little Rock, AR	2770	BLEDT-20041213ABI
KETZ-DT	12	El Dorado, AR	92872	BLEDT-20060526AFK
KFSM-DT	18	Fort Smith, AR	66469	BLCDT-20060530AIM
KFTA-DT	27	Fort Smith, AR	29560	BPCDT-19991028AEE
KHBS-DT	21	Fort Smith, AR	60353	BLCDT-20031121AMR
KKYK-DT	49	Camden, AR	86534	BPCDT-20050224ABE
KLRT-DT	30	Little Rock, AR	11951	BLCDT-20020507AAK
KTHV-DT	12	Little Rock, AR	2787	BLCDT-20041029AIX
KTVE-DT	27	El Dorado, AR	35692	BLCDT-20070105ABH
KVTH-DT	14	Hot Springs, AR	608	BPCDT-19990924AAP
KVTJ-DT	49	Jonesboro, AR	2784	BPCDT-19990930AAS
KVTN-DT	24	Pine Bluff, AR	607	BPCDT-19990924AAQ
KWBF-DT	44	Little Rock, AR	37005	BPCDT-20030418ABA
WABG-DT	32	Greenwood, MS	43203	BLCDT-20051024ABR
WMAO-DT	25	Greenwood, MS	43176	BPEDT-20000501AHB
WXVT-DT	15	Greenville, MS	25236	BPCDT-20080303ACC





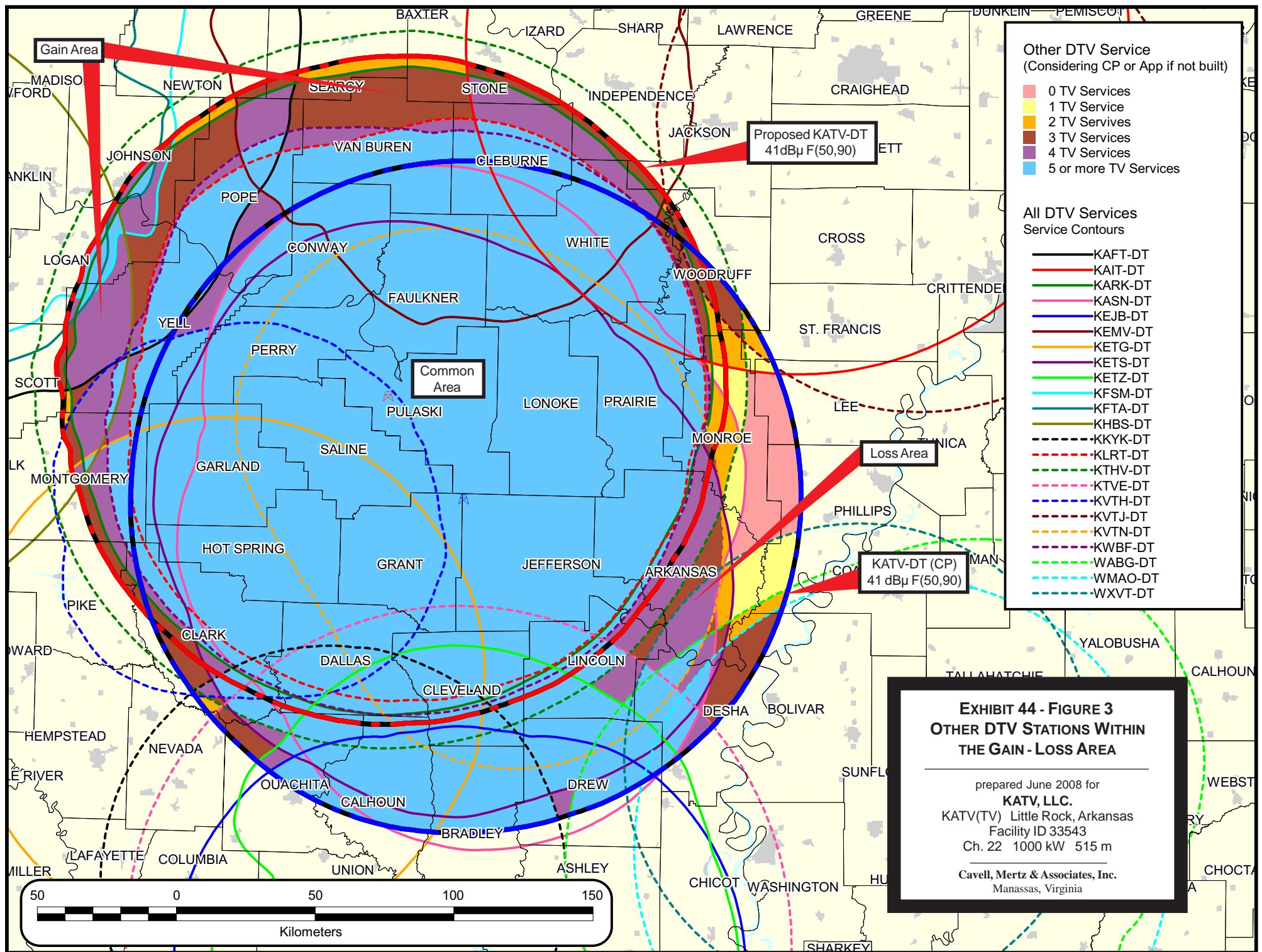


EXHIBIT 44 - FIGURE 4 **PREDICTED "TERRAIN LIMITED" COVERAGE**

prepared June 2008 for
KATV, LLC
 KATV(TV) Little Rock, Arkansas
 Ch. 22 1000 kW 515 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

FCC Predicted
 Gain Area

Prospective KATV
 Facility from
 Shinnall Mountain
 Ch. 22 1000 kW 515 m
 Service Contour

KATV CP Facility
 File # BPCDT-19991027ABF
 Ch. 22 750 kW 574 m
 Service Contour

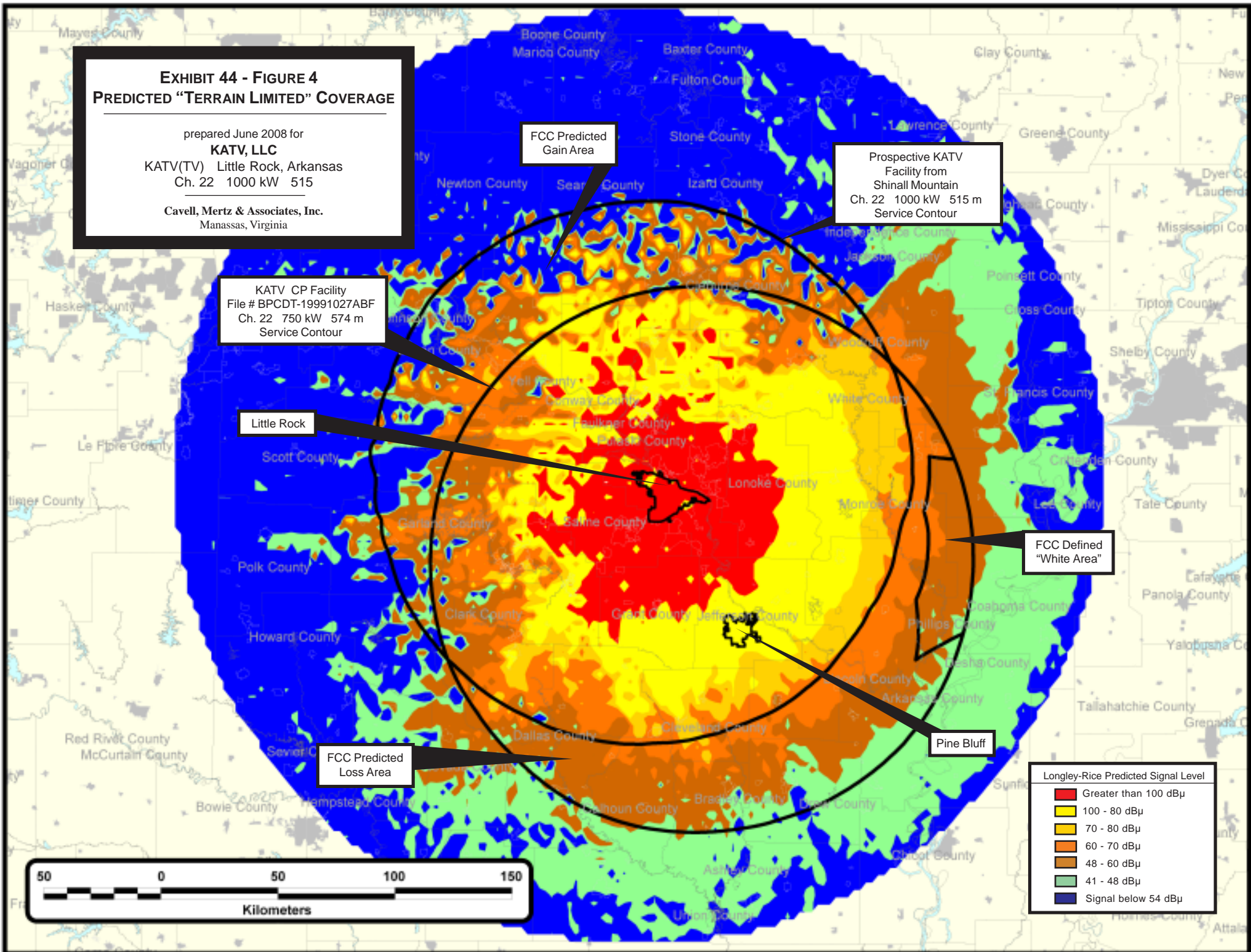
Little Rock

FCC Defined
 "White Area"

Pine Bluff

FCC Predicted
 Loss Area

Longley-Rice Predicted Signal Level	
	Greater than 100 dBμ
	100 - 80 dBμ
	70 - 60 dBμ
	60 - 48 dBμ
	48 - 41 dBμ
	41 - 34 dBμ
	Signal below 34 dBμ



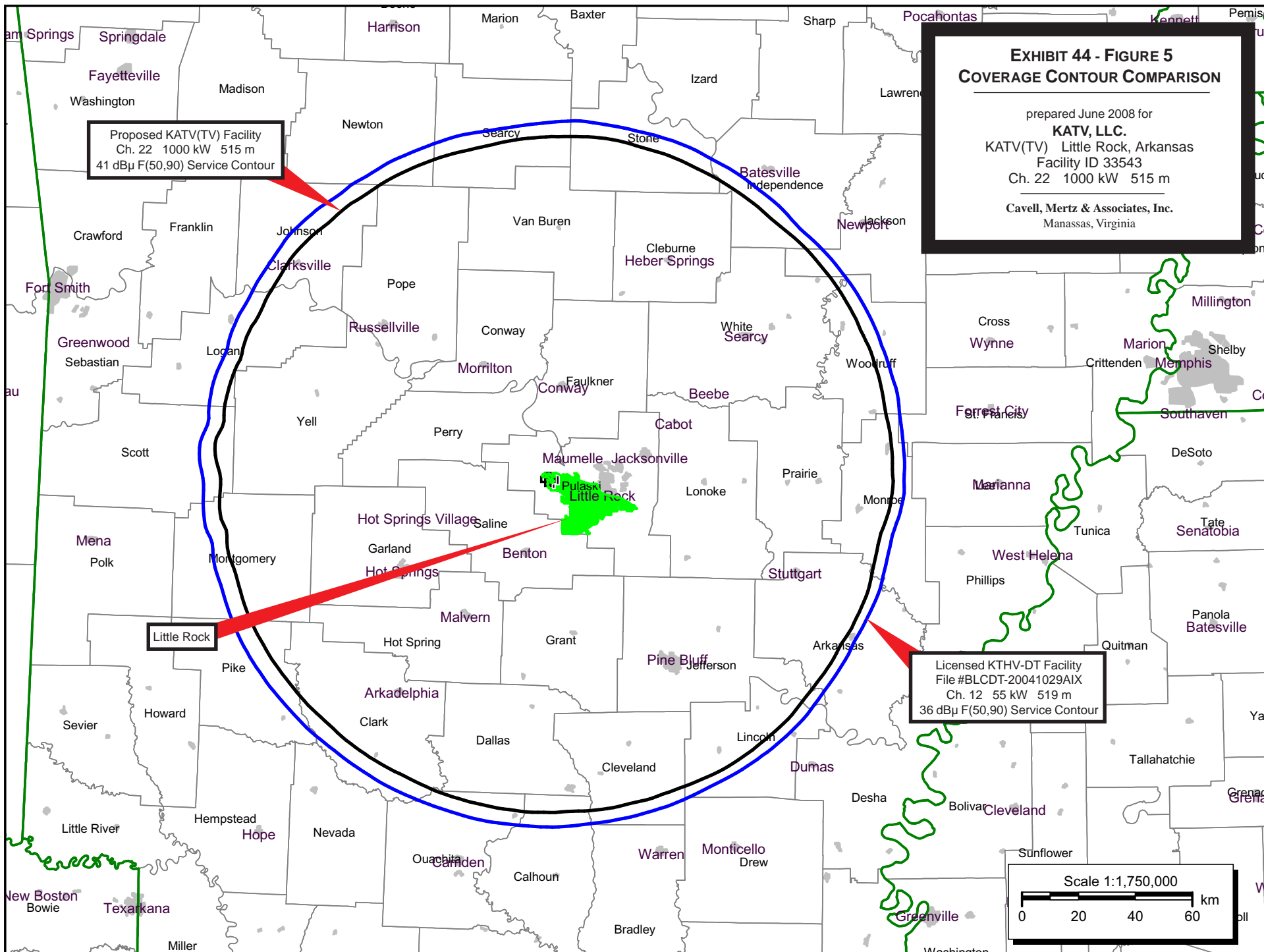


Exhibit 44 - Table II
CABLE AND SATELLITE PENETRATION
WITHIN THE DEFINED “LOSS AREA”
 prepared for
KATV, LLC
 KATV(TV) Little Rock, Arkansas

<u>County</u>	County Population Within <u>Defined Loss Area</u>	County Percent Cable/Satellite <u>Penetration</u>	Population <u>Covered</u>	Population <u>Not Covered</u>
Lee	872	95.6%	834	38
Monroe	7,080	90.8%	6,429	651
Phillips	1,378	97.6%	1,345	33
Arkansas	7,573	86.0%	6,513	1,060
St. Francis	434	96.2%	418	16
Jefferson	50	90.1%	45	5
Lincoln	5,139	86.7%	4,456	683
Desha	9,124	87.9%	8,020	1,104
Drew	17,395	97.1%	16,891	504
Bradley	11,119	91.5%	10,174	945
Cleveland	1,764	82.1%	1,448	316
Calhoun	4,906	93.8%	4,602	304
Dallas	3	83.3%	2	1
Ouachita	14,644	95.0%	13,912	732
Nevada	5	88.0%	4	1
Clark	3,574	91.6%	3,274	300
Woodruff	157	90.7%	142	15
Total	85,217		78,509	6,708

Exhibit 44 - Table III
CABLE AND SATELLITE PENETRATION
WITHIN THE DEFINED “GAIN AREA”
 prepared for
KATV, LLC
 KATV(TV) Little Rock, Arkansas

<u>County</u>	<u>County Population Within Defined Gain Area</u>	<u>Percent Cable/Satellite Penetration</u>	<u>Population Covered</u>	<u>Population Not Covered</u>
Clark	1,035	91.6%	948	87
Montgomery	5,346	76.9%	4,111	1,235
Scott	104	81.0%	84	20
Yell	16,576	90.5%	15,001	1,575
Logan	3,515	85.7%	3,012	503
Pope	46,029	92.7%	42,669	3,360
Johnson	11,072	90.9%	10,064	1,008
Newton	35	77.6%	27	8
Conway	361	81.0%	292	69
Van Buren	12,514	83.2%	10,412	2,102
Searcy	1,899	81.2%	1,542	357
Stone	2,454	83.0%	2,037	417
Cleburne	9,036	93.5%	8,449	587
White	4,247	80.5%	3,419	828
Independence	1,901	87.9%	1,671	230
Jackson	820	96.4%	790	30
Woodruff	2,333	90.7%	2,116	217
Pike	2,947	91.9%	2708	239
Total	122,224		109,352	12,872

Exhibit 44 - Table IV
CABLE AND SATELLITE PENETRATION
WITHIN THE DEFINED "WHITE AREA"
 prepared for
KATV, LLC
 KATV(TV) Little Rock, Arkansas

<u>County</u>	County Population Within <u>Defined "White Area"</u>	Percent Cable/Satellite <u>Penetration</u>	Population <u>Covered</u>	Population <u>Not Covered</u>
Lee	852	95.6%	815	37
Monroe	794	90.8%	721	73
Phillips	1,312	97.6%	1281	31
Arkansas	517	86.0%	445	72
St. Francis	0	96.2%	0	0
Total	3,475		3,262	213

Exhibit 44 – Table V
INTERFERENCE STUDY RESULTS
 prepared for
KATV, LLC
 KATV(TV) Little Rock, Arkansas
 Facility ID: 33543
 Ch. 22 1000 kW 515 m

<u>Channel</u>	<u>Affected</u> <u>Station</u>	<u>City</u>	<u>State</u>	<u>Facility</u> <u>Type</u>	<u>7th R&O</u> <u>Table</u> <u>(2000 Census)</u>	<u>Calculated</u> <u>Baseline</u> <u>(2000 Census)</u>	<u>Interference</u> <u>Population</u> <u>7th R&O</u> <u>(2000 Census)</u>	<u>Interference</u> <u>Population</u> <u>with Proposal</u> <u>(2000 Census)</u>	<u>Population</u> <u>Difference</u>	<u>New</u> <u>Interference</u>
20	KYKK-CA ¹	Little Rock	AR	License	---			--No interference---		
21	KHBS ²	Fort Smth	AR	License	525,000			--No interference---		
21	KHBS	Fort Smth	AR	Reference	525,000			--No interference---		
22	KMNO-LP	Monroe	LA	License	---	86,192	5,439	3,620	-1,819	-2.11%
22	WFIQ ³	Florence	AL	Reference	526,000			--No interference---		
22	KBSI	Cape Girardeau	MO	License	691,000			--No interference---		
22	KBSI	Cape Girardeau	MO	Reference	691,000			--No interference---		
22	KOKI-TV	Tulsa	OK	License	1,235,000	1,235,468	12,224	14,185	1,961	0.16%
22	KOKI-TV	Tulsa	OK	Reference	1,235,000	1,235,468	12,224	14,185	1,961	0.16%
22	KETK-TV	Jacksonville	TX	License	924,000	924,462	7,139	7,136	-3	0.00%
22	KETK-TV	Jacksonville	TX	Reference	924,000	924,462	7,139	7,136	-3	0.00%
23	WTWV	Memphis	TN	Reference	1,415,000			--No interference---		

1. The KYKK-CA construction permit (see BPTTA-20030211AAP) expired on April 4, 2008. Since this facility was never constructed and the CP expired, it was not considered in this study.

2. KHBS is within the "culling" distance for the proposed KATV facility. It is not considered for the authorized facility.

3. WFIQ is not within the "culling" distance for the proposed KATV facility. WFIQ is not impacted by the instant proposal.