

EXHIBIT 46
PUBLIC INTEREST STATEMENT

Young Broadcasting of Albany, Inc. (“Young”) currently operates digital television station WCDC-DT on pre-transition DTV Channel 36 pursuant to its special temporary authority (“STA”) in FCC File No. BDSTA-20020923ACM (and subsequent extensions of that STA). In the new DTV Table of Allotments (“TOA”), the FCC allotted WCDC-DT Channel 36 for post-transition operation. WCDC-DT’s current DTV construction permit in FCC File No. BMPCDT-20041104AOB matches its TOA facility.

WCDC-DT is a full-power satellite station of WTEN-DT, Albany, NY. As such, Young’s deadline to construct WCDC-DT’s full authorized TOA facility is February 17, 2009. *See Second Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television*, Report and Order, 19 FCC Rcd 18279 (2004) (“*Second Order*”), ¶ 104. WCDC-DT, through its rebroadcast of WTEN-DT, is affiliated with the ABC Network.

Pursuant to the STA, WCDC-DT currently operates at the same HAAT but with lower power than authorized in its CP and TOA facility. As indicated in WCDC-DT’s recently filed DTV Transition Status Report (FCC File No. BDTRCT-20080219BAW), the instant application requests modification of WCDC-DT’s construction permit to specify the parameters in the station’s current STA for post-transition operation. In addition, and only to the extent necessary, the instant application requests modification of WCDC-DT’s TOA facility to also specify the station’s STA parameters.

While Young had intended to maximize WCDC-DT’s facility, its experience in operating WCDC-DT’s current STA facility has proven that the coverage provided by the STA operation has exceeded Young’s expectations and that maximization is simply unnecessary at this time. Upon grant of the instant request, no further construction will be required for WCDC-DT’s post-transition DTV facility as it is expected that the currently-constructed DTV facility would satisfy the station’s requirements for the February 17, 2009, transition deadline.

As explained in further detail in the Engineering Exhibit attached to the instant application, while the STA operation (and proposed construction permit and license parameters) matches 77.4 percent of WCDC-DT’s TOA facility, grant of the instant request would not be contrary to the public interest for the following reasons:

First, the unmatched population is merely a theoretical “loss” as WCDC-DT’s current STA (and proposed continued) operation exceeds the station’s current analog coverage. Specifically, the station’s current analog facility reaches 1,105,590 persons while the current STA reaches 1,335,560 persons—a replication of analog by 120.8 percent. Accordingly, no current analog (or digital) viewers would lose access to WCDC-DT after the digital transition.

Second, in the theoretical “loss” area, over 39 percent of the population is predicted to receive WCDC-DT’s programming from its “mother” station, WTEN-DT. So while WCDC-

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DT's current STA operation is not predicted to reach these viewers, they will continue to be able to receive WCDC-DT's programming via WTEN-DT's operation.

Finally, of the remaining theoretical "loss" area, 100 percent of the population is located outside of WCDC-DT's Designated Market Area ("DMA") and nearly 99 percent of the population is predicted to receive WCDC-DT's ABC Network programming from the DTV facilities of other post-transition ABC affiliated stations. Thus, even with a theoretical "loss" area, there will be virtually no loss of ABC Network programming.

Accordingly, grant of the instant request would not be contrary to the public interest. In fact, the public interest is served because the STA (and proposed continued) operation brings and will continue to bring service to viewers who cannot receive the station's current analog signal.

Furthermore, the Commission has recognized the unique circumstances faced by satellite stations such as WCDC-DT. *See e.g., Second Order*, ¶¶ 98-106. As satellite stations provide programming to communities that cannot support a full-service station and often operate with financial challenges, the Commission has stated that the "unique status of and circumstances faced by satellite stations warrant special treatment of these stations during the [DTV] transition." *See id.*, ¶ 105.

Given WCDC-DT's status as a satellite station, it is particularly difficult for Young to justify any additional expenses for further construction of WCDC-DT's digital facility. To achieve the power specified in the station's current DTV construction permit and in the DTV TOA, Young would have to incur substantial expenses in transmitter and transmission system upgrades. Such expenses seem unnecessary given the facts that WCDC-DT's currently constructed DTV STA facility already significantly exceeds the coverage area of the station's analog facility and that construction of WCDC-DT's TOA would add no additional service to viewers in the station's DMA.

For the foregoing reasons, Young respectfully requests that the Commission authorize WCDC-DT's currently-constructed STA facility as the station's full post-transition facility by granting the instant application, and to the extent necessary, revising the DTV TOA to indicate WCDC-DT's technical parameters specified herein.

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