

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Combined Communications Corp. of Oklahoma, Inc.
WZZM-TV Grand Rapids, Michigan
Facility ID: 49713
Ch. 13 16.5 kW 324.3 m

Combined Communications Corp. of Oklahoma, Inc. (“*Oklahoma*”) is the licensee of analog television station WZZM-TV, Channel 13, Grand Rapids, Michigan (see BLCT-20020717AAQ). *Oklahoma* is also currently authorized to construct the post-transition digital facility for WZZM-TV on Channel 13 (“CP”, BPCDT-20080325AFK). With the lifting of the filing freeze¹, *Oklahoma* herein proposes to modify its CP to specify a maximized post-transition operation for WZZM-TV from the existing tower (see Antenna Structure Registration Number 1234009). The proposed facility will become operational following the Congressionally mandated shut down of all full service analog television stations on February 17, 2009.

Exhibit 44 - Figure 1 provides a map depicting the service contour for the proposed facility along with principal community coverage contour. As demonstrated therein, the principal community of Grand Rapids, Michigan 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 1,412,538 persons, which is 101.5 percent of the 1,392,000 persons that are predicted to receive interference free service from the Appendix B facility².

The proposed antenna is a Dielectric TW-12B13-R which is non-directional in the horizontal plane and is horizontally polarized with 0.75° of electrical beam tilt.

Since the proposed facility extends the service contour past that currently authorized for the Appendix B facility, post-transition interference studies were performed in accordance with the methods set forth in the Commission’s OET Bulletin No 69 (“OET-69”). The results of the studies indicate that no new interference in excess of the 0.5% limit established in the Commission’s Third

¹ See *Public Notice, Commission Lifts The Freeze On The Filing Of Maximization Applications And Petitions For Digital Channel Substitutions, Effective Immediately*, DA 08-1213, Released May 30, 2008.

² See *Memorandum Opinion And Order On Reconsideration of the Seventh Report and Order and Eighth Report And Order, Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, FCC 08-72, Released March 6, 2008

Exhibit 44 – Statement A

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Periodic Review³ is caused to affected stations by the post-transition WZZM-TV operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**.

There are no AM stations located within 3.2 km of the existing tower site. The proposed site is located 78 km from the FCC Monitoring Station in Allegan, Michigan. The effective radiated power from the proposed Channel 13 facility is significantly less than that of the existing, 257 kW, licensed Channel 13 NTSC facility. As a result of the power reduction, it is believed that further coordination is not required.

The proposed WZZM-TV digital Channel 13 site is located 257 km from the nearest point on the international border with Canada. As such, international coordination is respectfully requested.

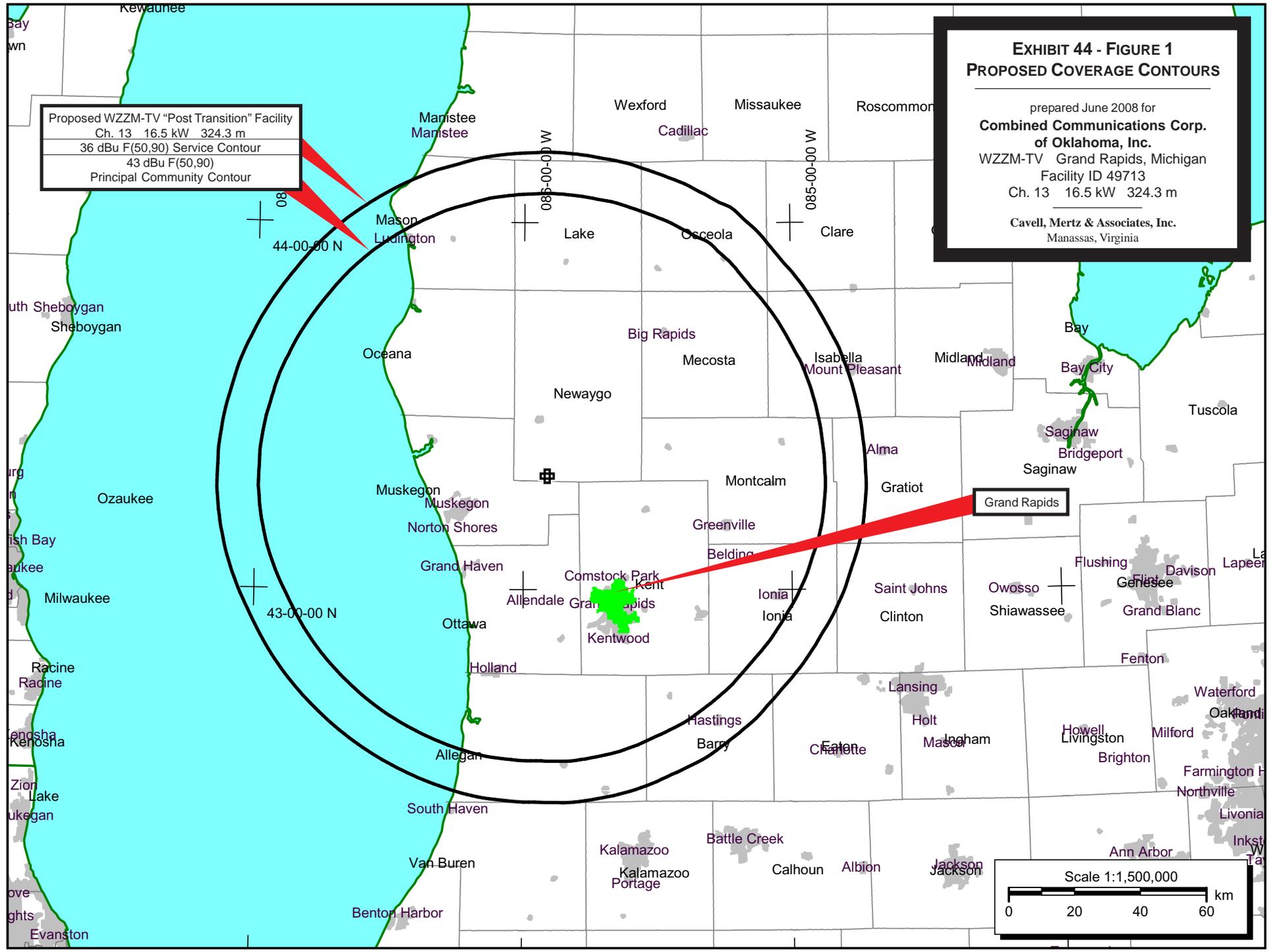
Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.

³ See *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.

**EXHIBIT 44 - FIGURE 1
PROPOSED COVERAGE CONTOURS**

prepared June 2008 for
**Combined Communications Corp.
of Oklahoma, Inc.**
WZZM-TV Grand Rapids, Michigan
Facility ID 49713
Ch. 13 16.5 kW 324.3 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Proposed WZZM-TV "Post Transition" Facility
Ch. 13 16.5 kW 324.3 m
36 dBu F(50,90) Service Contour
43 dBu F(50,90)
Principal Community Contour



Grand Rapids

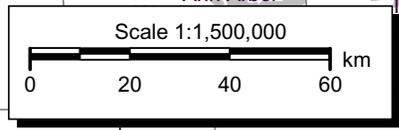


Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS

prepared for
Combined Communications Corp. of Oklahoma, Inc.
WZZM-TV Grand Rapids, MI
Facility Id: 49713
Ch. 13 16.5 kW 324.3 m

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</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>New Interference</u>	
								<u>Population</u>	<u>Percentage</u>
12	WBBM-TV	Chicago, IL	Reference	9,367,000			---	No Interference	---
12	WBBM-TV	Chicago, IL	BPCDT-20080328ADQ	9,367,000			---	No Interference	---
12	WINM(TV)	Angola, IN	BLCDDT-20021025AAN	874,000			---	No Interference	---
12	WINM(TV)	Angola, IN	Reference	874,000			---	No Interference	---
12	WJRT-TV	Flint, MI	BPCDT-20080610AAJ	2,103,000			---	No Interference	---
12	WJRT-TV	Flint, MI	Reference	2,103,000			---	No Interference	---
12	WJRT-TV	Flint, MI	BPCDT-20080610AAJ	2,103,000			---	No Interference	---
13	WOCK-CA	Chicago, IL	BSTA-20060213ADH				---	No Interference	---
13	WOCK-CA	Chicago, IL	BPTVA-20070611ABC				---	No Interference	---
13	WOCK-CA	Chicago, IL	BLTVA-20021125AAU				---	No Interference	---
13	WREX-TV	Rockford, IL	Reference	1,487,000	1,486,947	141,850	149,000	7,150	0.481 %
13	WREX-TV	Rockford, IL	BPCDT-20080328AAM	1,487,000	1,465,376	158,901	161,731	2,830	0.193 %
13	WTHR(TV)	Indianapolis, IN	BPCDT-20080508ABC	2,510,000	2,532,054	19,210	19,210	0	0.000 %
13	WTHR(TV)	Indianapolis, IN	Reference	2,510,000	2,510,524	19,201	19,201	0	0.000 %
13	WNMU(TV)	Marquette, MI	BMPEDT-20080312ACG	183,000	182,575	506	506	0	0.000 %
13	WNMU(TV)	Marquette, MI	Reference	183,000	183,657	196	196	0	0.000 %
13	WTVG(TV)	Toledo, OH	Reference	2,547,000	2,547,220	79,279	79,321	42	0.002 %
13	WTVG(TV)	Toledo, OH	BPCDT-20080317AIO	2,547,000	3,095,756	124,006	124,006	0	0.000 %