

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Multimedia Holdings Corporation
KPNX(TV) Mesa, Arizona
Facility ID: 35486
Ch. 12 39 kW 555 m

Multimedia Holdings Corporation (“*Multimedia*”) is the licensee of analog television station KPNX(TV), Channel 12, Mesa, Arizona (see BLCT-20000711ABX). *Multimedia* herein seeks to amend its pending application (see BPCDT-20080321ADA) to specify a reduced effective radiated power (“ERP”) for the post-transition digital facility for KPNX(TV) on Channel 12. With the lifting of the filing freeze¹, *Multimedia* amended its pending application to specify a maximized post-transition digital operation for KPNX. However, based on information provided by Commission Staff concerning the interpretation of Section 73.622(f)(5), this amendment proposes a reduction in the maximized ERP from 43 kW to 39 kW. The proposed facility will become operational following the Congressionally mandated shut down of all full service analog television stations currently scheduled for 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 Mesa, Arizona 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 3,245,702 persons, which is 100.3 percent of the 3,236,000 persons that are predicted to receive interference free service from the Appendix B facility².

Exhibit 44-Figure 2 provides a comparison of the proposed digital facilities service contour along with that of the licensed KPNX analog facility. As shown therein, the coverage footprint for the proposed facility covers a larger area than that of the analog KPNX operation. The proposed facility is predicted to provide interference free service to 3,245,702 persons, which is 100.6 percent of the 3,227,739 persons that are predicted to receive interference free service from the licensed KPNX analog facility.

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.

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The proposed antenna is a Dielectric TW-15B12 which is non-directional in the horizontal plane and is horizontally polarized with 0.8° of electrical beam tilt.

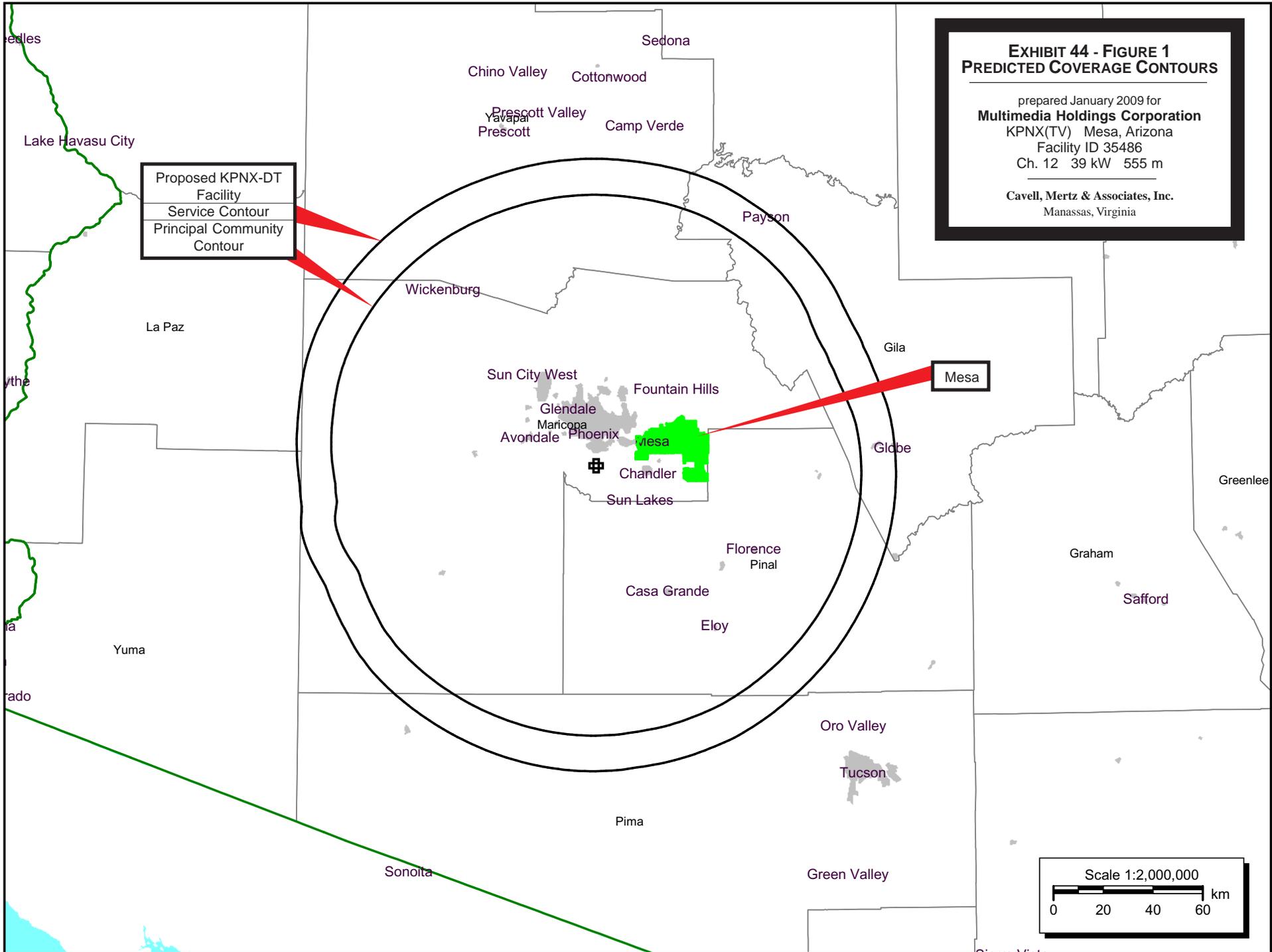
The proposed 39 kW ERP complies with the maximum ERP permitted for the proposed antenna HAAT of 555 meters as discussed in §73.622(f)(7)(i). Since the proposed facility extends the service contour past that currently authorized for the Appendix B facility, post-transition interference studies were performed 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 Periodic Review³ is caused to affected stations by the post-transition KPXX digital operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44-Table I**.

The proposed KPXX digital Channel 12 site is located less than 400 km from the nearest point on the international border with Mexico. We understand from Commission Staff that coordination of a facility with a 40 kW ERP at 555 m HAAT combination has already been successfully completed with Mexican officials. Thus, further international coordination is believed to be unnecessary. The nearest FCC monitoring station is Douglas, AZ at a distance of 304 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. There are no AM stations located within 3.2 km of the existing tower site.

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

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

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.



Proposed KPNX-DT Facility
 Service Contour
 Principal Community Contour

EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS

prepared January 2009 for
Multimedia Holdings Corporation
 KPNX(TV) Mesa, Arizona
 Facility ID 35486
 Ch. 12 39 kW 555 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Mesa

Scale 1:2,000,000
 0 20 40 60 km

**EXHIBIT 44 - FIGURE 2
COVERAGE CONTOUR COMPARISON**

prepared January 2009 for
Multimedia Holdings Corporation
KPNX(TV) Mesa, Arizona
Facility ID 35486
Ch. 12 39 kW 555 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

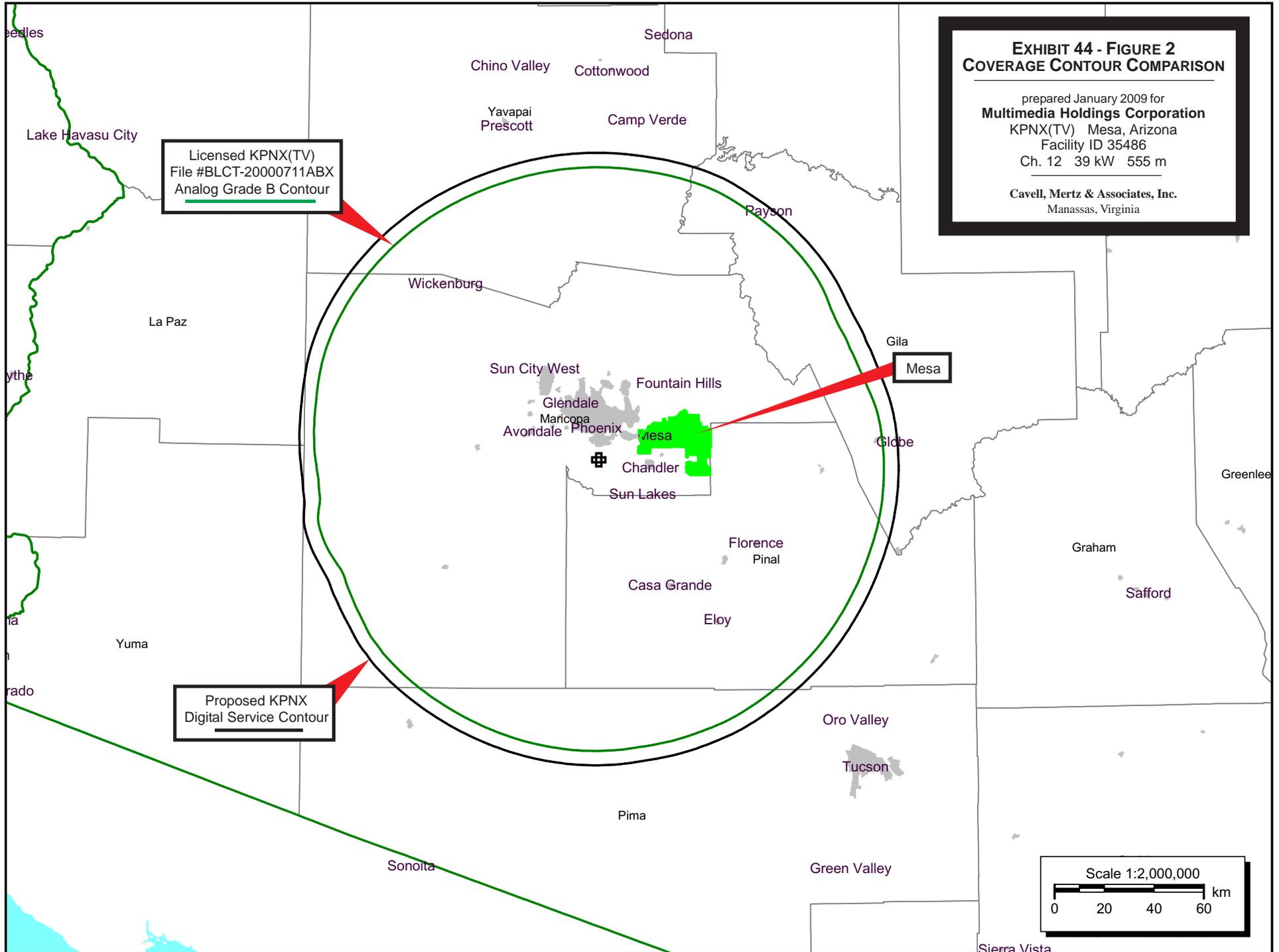


Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS

prepared for

Multimedia Holdings Corporation

KPNX(TV) Mesa, AZ

Facility Id: 35486

Ch. 12 39 kW 555 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 without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
								<u>Population</u>	<u>Percentage</u>
11	KDTP(TV)	Holbrook, AZ	BMPEDT-20080616ACH	16,000	290,064	11,198	11,198	0	0.000 %
12	KOBG-TV	Silver City, NM	BPCDT-20080502ABH	58,000			---	No Interference	---
12	KOBG-TV	Silver City, NM	Reference	58,000	58,246	0	28	28	0.048 %
13	KFPH-TV	Flagstaff, AZ	BMPCDT-20080618AND	203,000			---	No Interference	---
13	KFPH-TV	Flagstaff, AZ	Reference	203,000			---	No Interference	---