

Exhibit 8 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
Multimedia Holdings Corporation
K61FB Globe-Miami, Arizona
Facility ID 35487
Ch. 48 2.07 kW (DA-MAX)

Multimedia Holdings Corporation (“*Multimedia*”) is the licensee of television translator station K61FB, Channel 48, Globe-Miami, AZ, Facility ID 35487 (BLTT-19891115JJ). K61FB’s licensed operation on Channel 61 is displaced pursuant to §73.3572(a)(4)(ii). *Multimedia* proposes herein to change K61FB to Channel 48, increase effective radiated power, and employ a different directional antenna. No change in actual antenna site location is specified, however the K61FB site data (coordinates, ground elevation, overall structure height) are corrected herein to correspond to the existing antenna structure employed.

The proposed facility will operate on Channel 48 using “zero” offset, with a directional antenna having a maximum ERP of 2.07 kW. **Exhibit 8 - Figure 1** depicts the 74 dB μ service contour of both the licensed and the proposed facility. The service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system for K61FB will be side-mounted on the same, existing antenna support structure as the licensed K61F facility. The tower structure is not presently registered with the Commission, as it is an existing structure of less than 61 meters overall height above ground and there are no known landing areas within 8 km. No marking or lighting specifications are presently required. Since no change to the structure’s overall height is proposed, FAA notification and commensurate FCC registration are not necessary.

Allocation Considerations

The instant proposal complies with the Commission’s standard contour overlap protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations except those summarized in **Exhibit 8 – Table 1**. 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

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Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)¹. The interference study examined the change in interference as experienced by the stations subject to overlap that would result from the proposed facility. The results, summarized in **Exhibit 8 - Table 1**, show that any new interference does not exceed the Commission’s 0.5 percent rounding tolerance.

Accordingly, the instant proposal complies with §§74.705 – 74.710 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

Other Allocation Considerations

The nearest FCC monitoring station is at Douglas, AZ, at a distance of 234.1 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 areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no AM broadcast stations located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission’s engineering database.

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** Comparisons of various results of this computer program (run on a Sun processor) to the Commission’s implementation of OET-69 show excellent correlation.

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The site is located 214 km from the U.S. - Mexican border. International coordination is not required under the current U.S. – Mexican agreement, as the proposal’s effective radiated power is less than 10 kW and the site is beyond 100 km from the border.²

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

² *Agreement Amending the Agreement relating to Assignments and Usage of Television Broadcasting Channels in the Frequency Range 470-806 MHz (Channels 14-69) Along the United States-Mexico Border*, November 21, 1988, Paragraph I, Section 3(c)

Exhibit 8 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
Multimedia Holdings Corporation
 K61FB Globe-Miami, Arizona
 Facility ID 35487
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| <u>Ch.</u> | <u>Call</u> | <u>City/State</u> | <u>Dist(km)</u> | <u>Status</u> | <u>Application Ref. No.</u> | ----- Population (1990 Census) ----- | |
|------------|-------------|-------------------|-----------------|---------------|-----------------------------|--------------------------------------|-------------------------|
| | | | | | | <u>Baseline</u> | <u>New Interference</u> |
| 47 | KUVE-TV | GREEN VALLEY AZ | 104.0 | CP | BPCDT-20000501AEM | --- | none |
| 48 | K48FC | FORT APACHE AZ | 81.2 | LIC | BLTT-19961125JH | --- | none |