

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED DIRECTIONAL ANTENNA
prepared for
Multimedia Holdings Corporation
WTLV(TV) Jacksonville, Florida
Facility ID 65046
Ch. 13 30 kW (MAX-DA) 306.7 m

Multimedia Holdings Corporation (“*Multimedia*”) is the licensee of analog station WTLV(TV), Channel 12, Jacksonville, Florida (see BMLCT-20040930AKX), and the companion pre and post-transition digital station, WTLV-DT, Channel 13 (see BLCDDT-20040421AAH). As the Commission is aware, WTLV-DT has experienced antenna problems which have been documented in the Special Temporary Authorization, BDSTA-20070521ADK¹. The antenna problems require that the WTLV-DT antenna be replaced. The instant engineering statement supports a request to modify the WTLV-DT authorization to specify the replacement directional antenna.

WTLV-DT operates from common antenna also employed by co-owned WJXX-DT, Channel 10, Facility ID 11893, Orange Park, Florida (see BLCDDT-20041102AEE). The common WTLV-DT/WJXX-DT antenna is supported by the existing WTLV(TV) analog antenna. Replacement of the WTLV-DT/WJXX-DT common antenna involves the replacement of the supporting structure with a structure more robust than the current WTLV(TV) analog antenna. Based on information provided by a technical representative of *Multimedia*, installation of the replacement antenna is scheduled to commence on December 15, 2008. Therefore, *expedited processing of the instant application is hereby respectfully requested on behalf of the applicant.*

The proposed WTLV-DT antenna is a Dielectric THB-C3SP-3H/6HD1H-1-T that is directional in the horizontal plane with 0.6° of electrical beam tilt. A relative field pattern is provided in **Exhibit 44-Figure 1**. A tabulation of the antenna horizontal plane relative field data is provided in the “Tech Box” section 10 of the FCC Form 301. A depiction of the antenna vertical plane (elevation) relative field pattern is provided in **Exhibit 44-Figure 2**. The pertinent coverage contours are provided in **Exhibit 44-Figure 3**. As shown therein, the principal

¹ As extended by BEDSTA-20080212AAD.

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community of Jacksonville, Florida is completely encompassed by the proposed facility's City Grade FCC coverage contour.

The existing WTLV-DT antenna is non-directional. The proposed antenna is directional to limit the signal over the ocean. As a result of the practical antenna pattern shape, a small loss area over land is predicted. **Exhibit 44-Figure 4** provides a depiction of the defined gain and loss areas using the Commission standard propagation method or the "curves". Since the Commission's "curves" are not a reliable prediction of actual coverage, an alternative propagation method can be employed as permitted by the Commission's Rules. In this case, a computer program based on the Commission's OET Bulletin 69 ("OET-69") Longley-Rice propagation method was employed in preparing the attached maps. Also for this study, the graphical output from the OET-69 computer program within the FCC-defined "coverage" area is displayed **Exhibit 44-Figures 5 and 6²**. The blue tinted blocks (or cells) are those unique locations where the OET-69 study predicted no Channel 13 digital coverage (due to terrain or interference) from the licensed WTLV-DT operation. The green tinted blocks (cells) depict common areas where both the licensed non-directional and proposed directional antenna operations are predicted not to have coverage (due to terrain blockage or interference). Finally, the yellow tinted blocks (cells) depict unique areas where there is no predicted digital coverage from the proposed directional antenna operation (due to terrain blockage or interference).

The typical OET-69 study provides pertinent population data within the bounds of the respective facility service contours. The normal computer program output is as follows:

<u>Facility</u>	<u>Interference-Free Population (2000 Census)</u>	<u>Percent Match to Appendix B Facility</u>
WTLV-DT Appendix B Reference Facility	1,381,000	- -
WTLV-DT Licensed Facility (BLC DT-20040421AAH) pre-transition	1,368,194	99.1%
WTLV-DT Proposed Facility pre-transition	1,352,429	97.9%
WTLV-DT Licensed Facility (BLC DT-20040421AAH) post-transition	1,372,065	99.4%
WTLV-DT Proposed Facility post-transition	1,344,190	97.3%
WTLV(TV) Licensed Analog Facility (BMLCT-20040930AKX) pre-transition	1,266,329	91.7%

² These studies employed the larger WTLV-DT licensed service contour over the smaller WTLV(TV) analog Grade B contour as the study boundary.

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As shown above, the proposed WTLV-DT facility will cover at least 97.3% of those persons predicted to receive interference-free coverage when compared to the Appendix B population. In fact, the proposed WTLV-DT facility covers more people than the current analog facility. Accordingly, since the population coverage is in excess of 95%, FCC Form 301, Section III-D, Question 1(e) has been answered “yes”.

OET-69 **pre-transition studies** employed a **cell size of 2 km** and a **terrain increment of 0.85 km**. Pre-transition studies also were adjusted to *ignore* the database records for the construction permit and allotment facility for WEDU(TV), Channel 13, Facility ID 21808, Tampa, Florida (see BPEDT-20080317ACK and DTVP-0427, respectively). The WEDU facility is a “post-transition” operation according to CDBS and cannot begin operation until February 17, 2009. Currently, and up until the February 2009 transition date, WTVT(TV), analog Channel 13, File No. BLCT-1682, Tampa, FL, is in operation. *It is respectfully requested that Commission Staff employ these parameters when performing confirming pre-transition studies.*

Post-transition OET-69 studies employed a **cell size of 1 km** and a **terrain increment of 1 km**. *It is respectfully requested that Commission Staff employ these parameters when performing confirming post-transition studies.*

Since actual station coverage is not abruptly cutoff at the Grade B contour, the OET-69 computer program was adjusted to study a larger area than that bounded by the proposed facility’s service contour. In this case, the study area was graphically limited to within the licensed WTLV-DT facility’s service contour. The results from the pre-transition study were employed as the basis of **Exhibit 44-Figure 5** and are provided in the following table:

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<u>Facility</u>	Unique Population	Common	Total Population	New Population	
	Loss Due	Population	Loss Due	Loss from	Percent Loss
	to Terrain Loss	Loss Due	to Terrain Loss	Proposed	From Licensed
	or Interference	to Terrain Loss	or Interference	Facility	Digital Contour
	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>Population</u>
WTLV-DT Licensed Facility	2,749 ³	21,534 ⁴	24,283	--	--
WTLV-DT Proposed Facility	18,803 ⁵	21,534 ⁴	40,337	16,054	1.1%

As shown above, only 1.1% of those persons that currently are predicted to receive interference-free coverage within the licensed digital service contour will lose coverage due to terrain blockage or interference. Thus, 98.9% of the persons predicted to receive interference-free service from WTLV-DT will continue to receive service.

Likewise, the same evaluation was performed for the post-transition conditions since other facilities that currently contribute to the coverage/interference calculations, after February 17, 2009, will have either changed channel or ceased operation. The results from the post-transition study were employed as the basis of **Exhibit 44-Figure 6** and are provided in the following table:

<u>Facility</u>	Unique Population	Common	Total Population	New Population	
	Loss Due	Population	Loss Due	Loss from	Percent Loss
	to Terrain Loss	Loss Due	to Terrain Loss	Proposed	From Licensed
	or Interference	to Terrain Loss	or Interference	Facility	Digital Contour
	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>(2000 Census)</u>	<u>Population</u>
WTLV-DT Licensed Facility	1,049 ⁶	27,158 ⁷	28,207	--	--
WTLV-DT Proposed Facility	10,542 ⁸	27,158 ⁷	37,700	9,493	0.7%

As shown above, 0.7% of those persons that currently are predicted to receive interference-free coverage within the licensed digital service contour will lose coverage (due to terrain blockage or interference) from the proposed facility. Thus, 99.3% of the persons

³ In Exhibit 44-Figure 5, the blue tinted cells.

⁴ In Exhibit 44-Figure 5, the green tinted cells.

⁵ In Exhibit 44-Figure 5, the yellow tinted cells.

⁶ In Exhibit 44-Figure 6, the blue tinted cells.

⁷ In Exhibit 44-Figure 6, the green tinted cells.

⁸ In Exhibit 44-Figure 6, the yellow tinted cells.

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predicted to receive interference-free service from WTLV-DT will continue to receive service. Thus, only a *de minimis* reduction in coverage will result from the instant proposal.

Interference studies, in accordance with OET-69, were performed to determine compliance with the currently stated new interference limit of 0.5%. Two pre-transition studies were performed to determine the impact of the licensed and proposed facilities. The comparison of the study results is provided in the attached **Exhibit 44-Table 1**. As demonstrated, new interference does not exceed the Commission's 0.5 percent interference limit and, in fact, is reduced.

A study was also performed for the post-transition situation. The results of the post-transition study are provided in the attached **Exhibit 44-Table 2**. As shown therein, there is no new interference in excess of 0.5%. Thus, the instant proposal complies with the Commission's new interference limits.

The proposed WTLV-DT 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 Vero Beach, FL, at a distance of 308.9 km from the proposed site. This far exceeds the distance that would require 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.

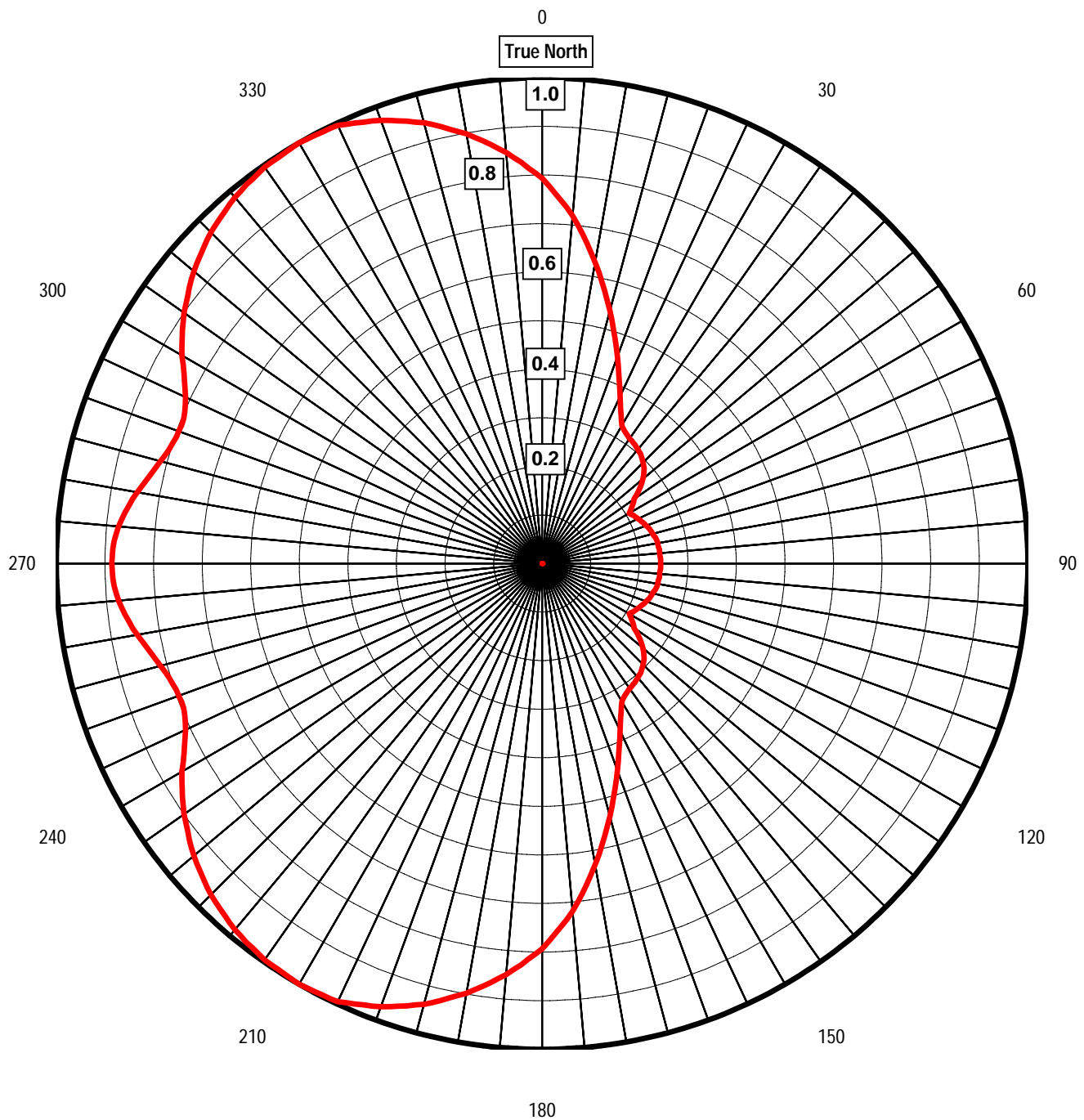


Exhibit 44-Figure 1
ANTENNA HORIZONTAL PLANE
RELATIVE FIELD RADIATION PATTERN

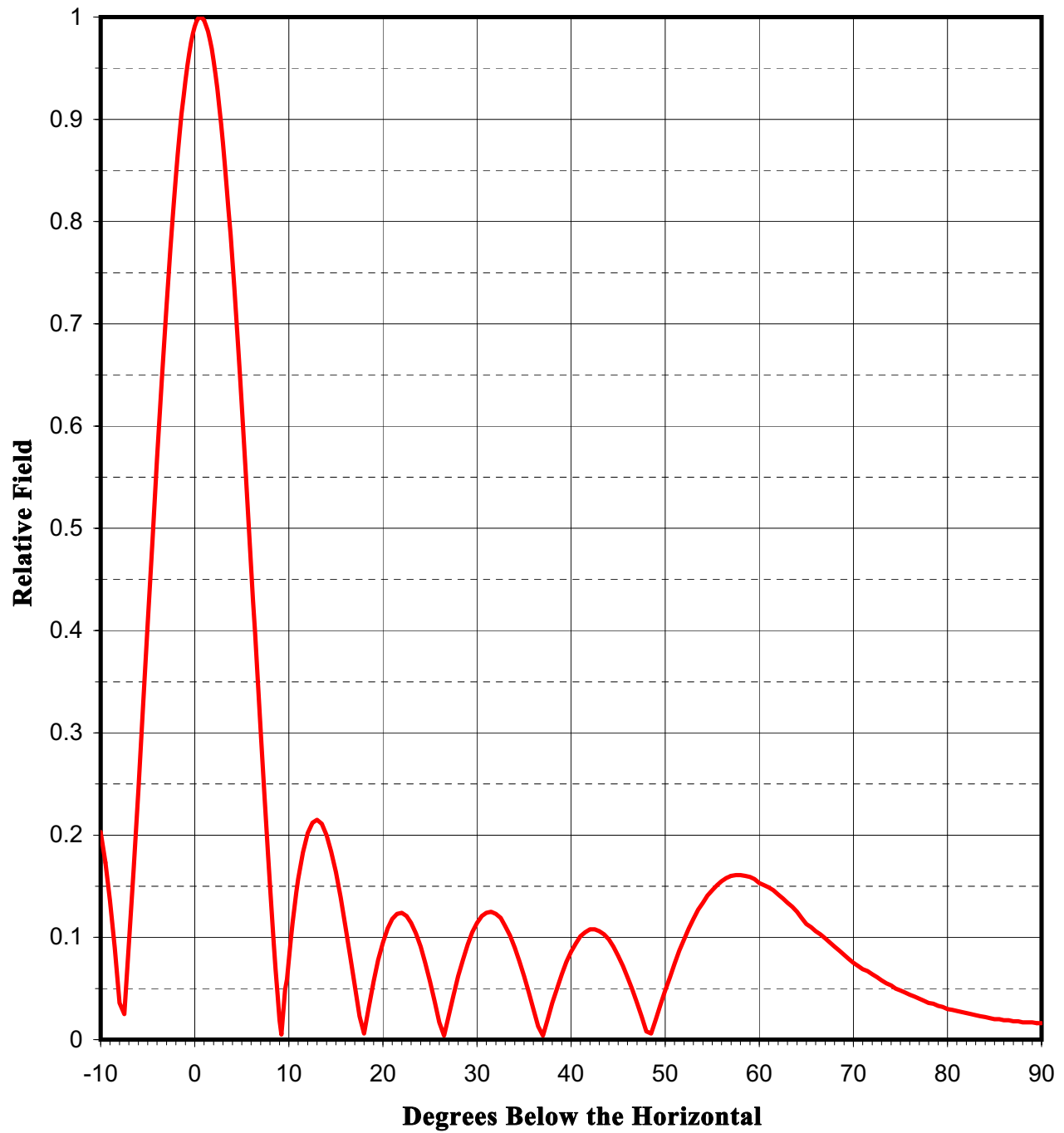
prepared December 2008 for
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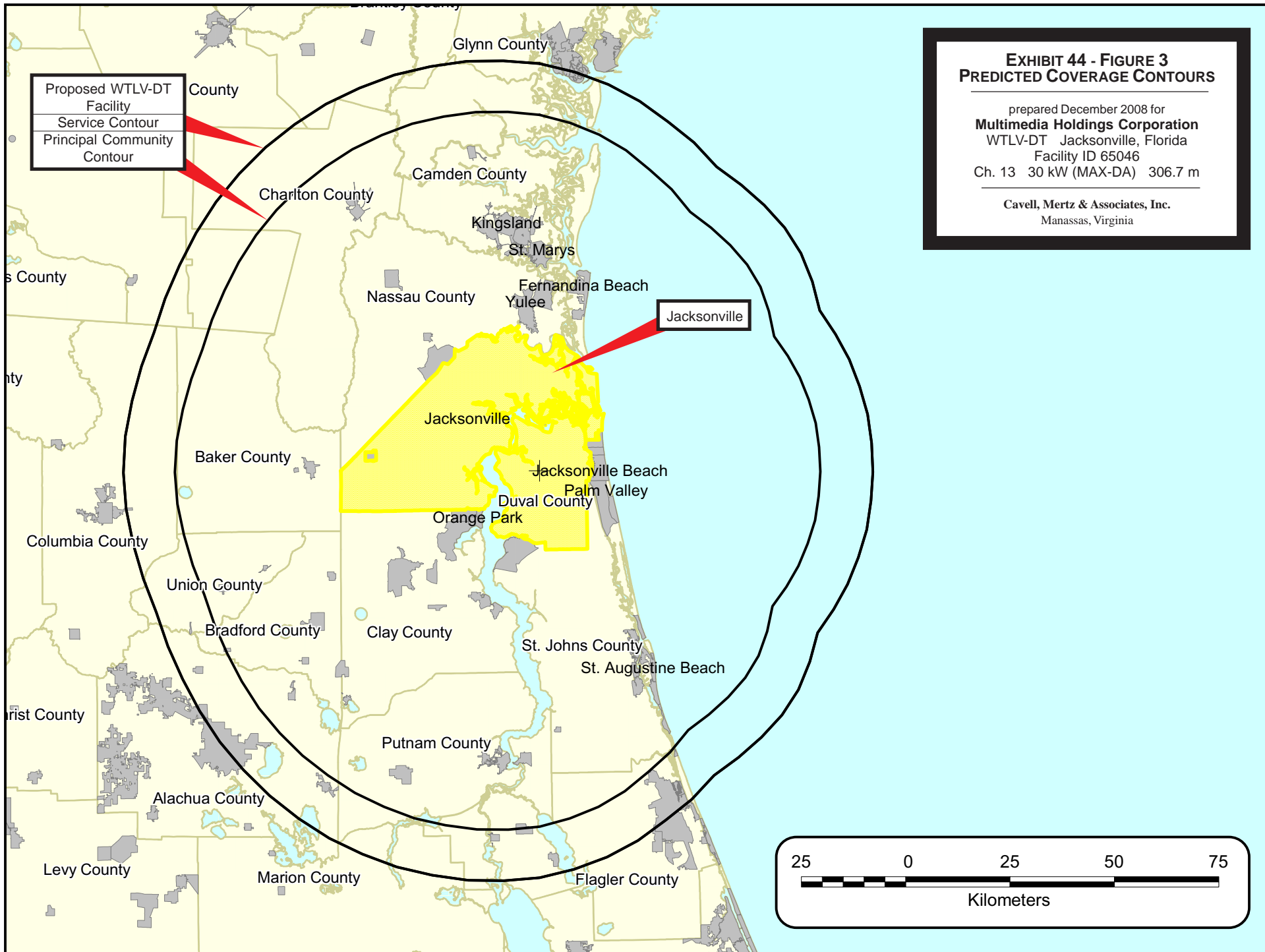
Cavell, Mertz & Associates, Inc.
Manassas, Virginia

EXHIBIT 44 - FIGURE 2
ANTENNA VERTICAL PLANE
(ELEVATION) RELATIVE FIELD PATTERN

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Cavell, Mertz & Associates, Inc.
Manassas, Virginia





**EXHIBIT 44 - FIGURE 4
FCC PREDICTED
GAIN AND LOSS AREA**

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Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WTLV(TV) Analog
File #BMLCT-20040930AK
Grade B Contour
Licensed WTLV-DT
File #BLCDT-20040421AAH
Service Contour

Proposed WTLV(TV)
Service Contour

Longley-Rice Predicted Signal Level

- Gain area between Licensed and Proposed WTLV-DT service contour
- Gain area between Licensed WTLV(TV) analog Grade B contour and Proposed WTLV-DT service contour
- Loss area between Licensed WTLV(TV) analog Grade B contour and Proposed WTLV-DT service contour
- Loss area between licensed WTLV-DT service contour and Proposed WTLV-DT service contour

25 0 25 50 75
Kilometers

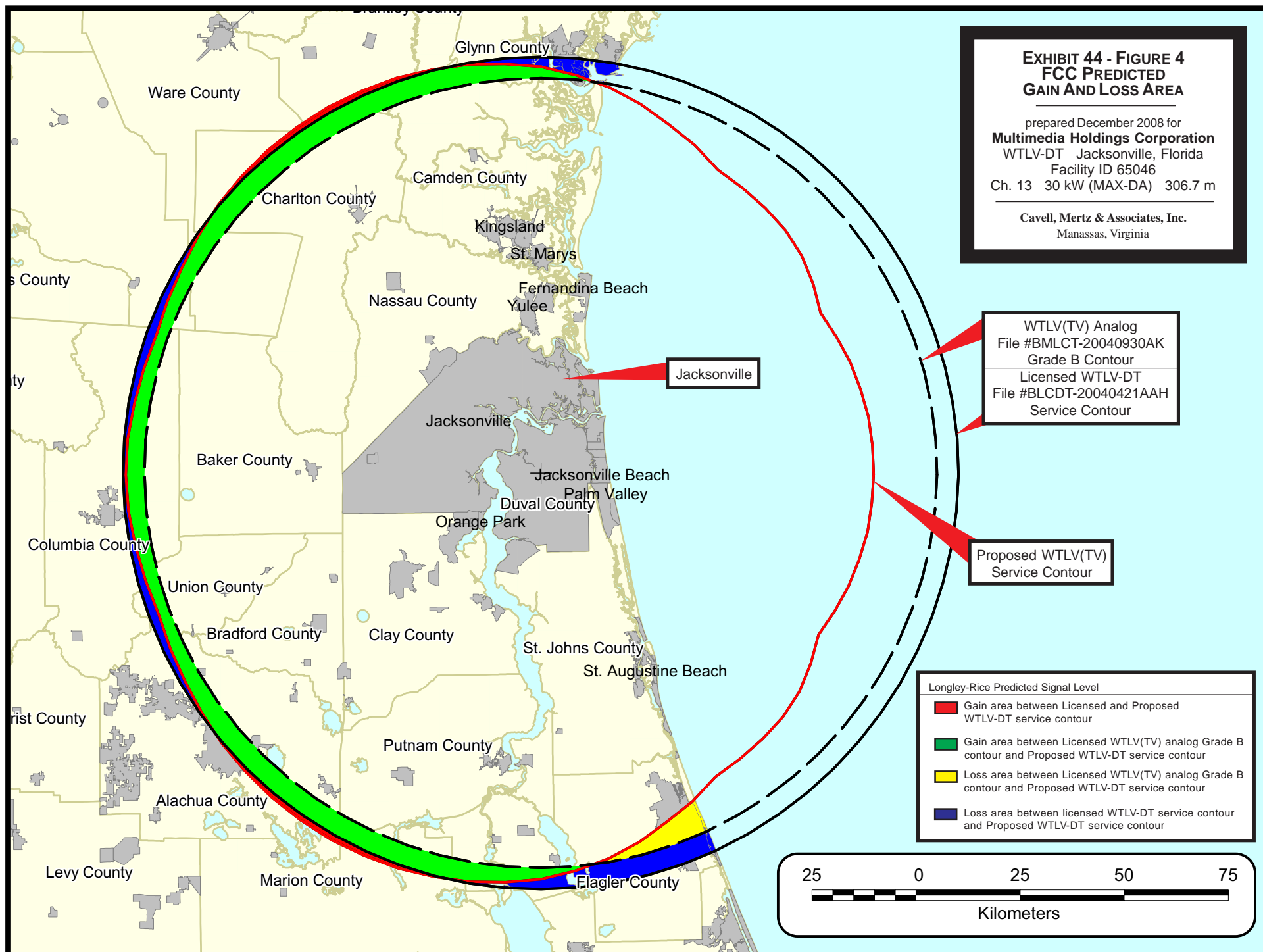


EXHIBIT 44 - FIGURE 5 **PREDICTED "LONGLEY-RICE"** **COVERAGE AND LOSS** **(PRE-TRANSITION)**

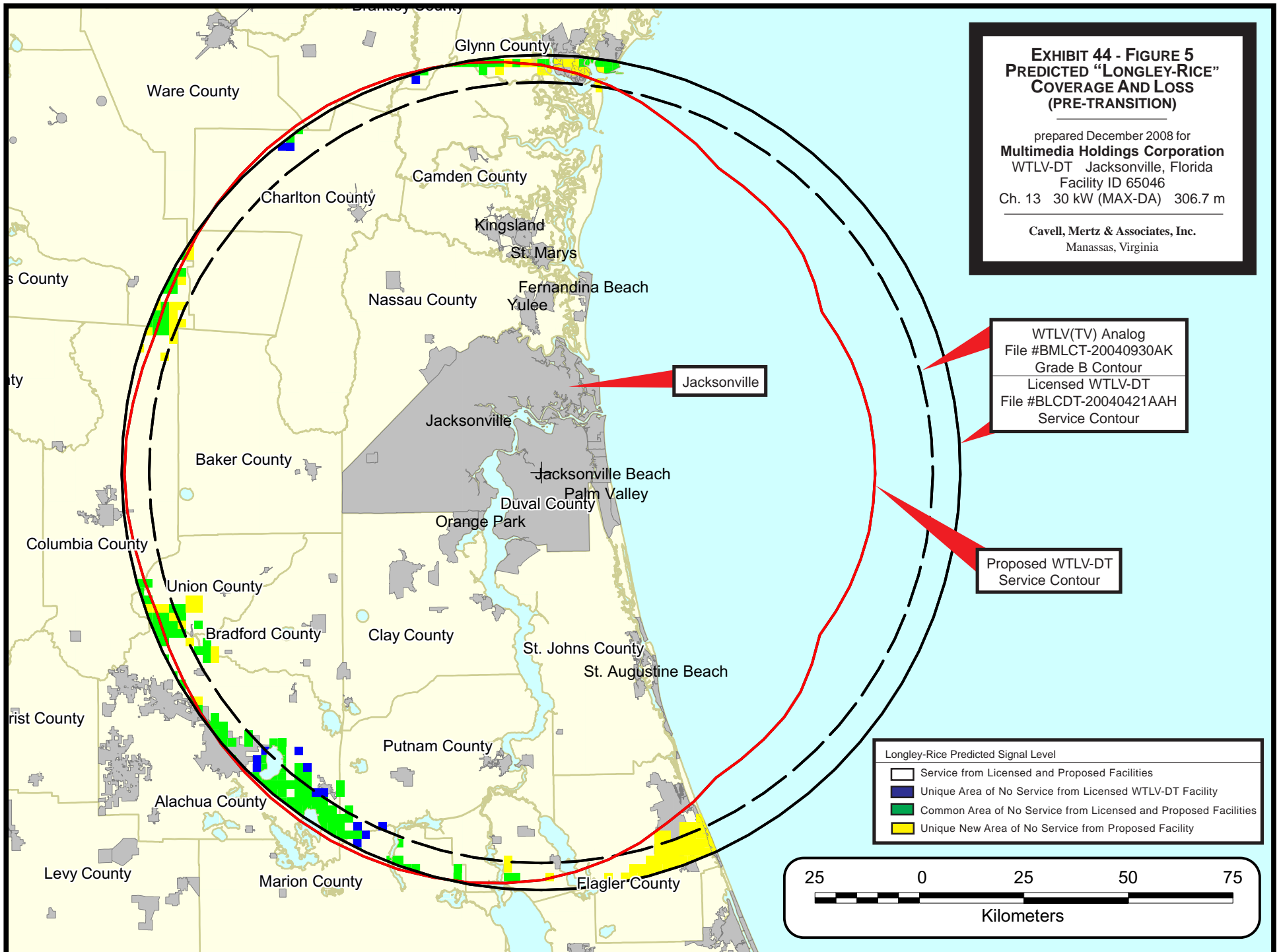
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 Manassas, Virginia

WTLV(TV) Analog
 File #BMLCT-20040930AK
 Grade B Contour
 Licensed WTLV-DT
 File #BLCDT-20040421AAH
 Service Contour

Proposed WTLV-DT
 Service Contour

Longley-Rice Predicted Signal Level	
	Service from Licensed and Proposed Facilities
	Unique Area of No Service from Licensed WTLV-DT Facility
	Common Area of No Service from Licensed and Proposed Facilities
	Unique New Area of No Service from Proposed Facility



**EXHIBIT 44 - FIGURE 6
PREDICTED "LONGLEY-RICE"
COVERAGE AND LOSS
(POST-TRANSITION)**

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Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WTLV(TV) Analog
File #BMLCT-20040930AK
Grade B Contour
Licensed WTLV-DT
File #BLCDT-20040421AAH
Service Contour

Proposed WTLV-DT
Service Contour

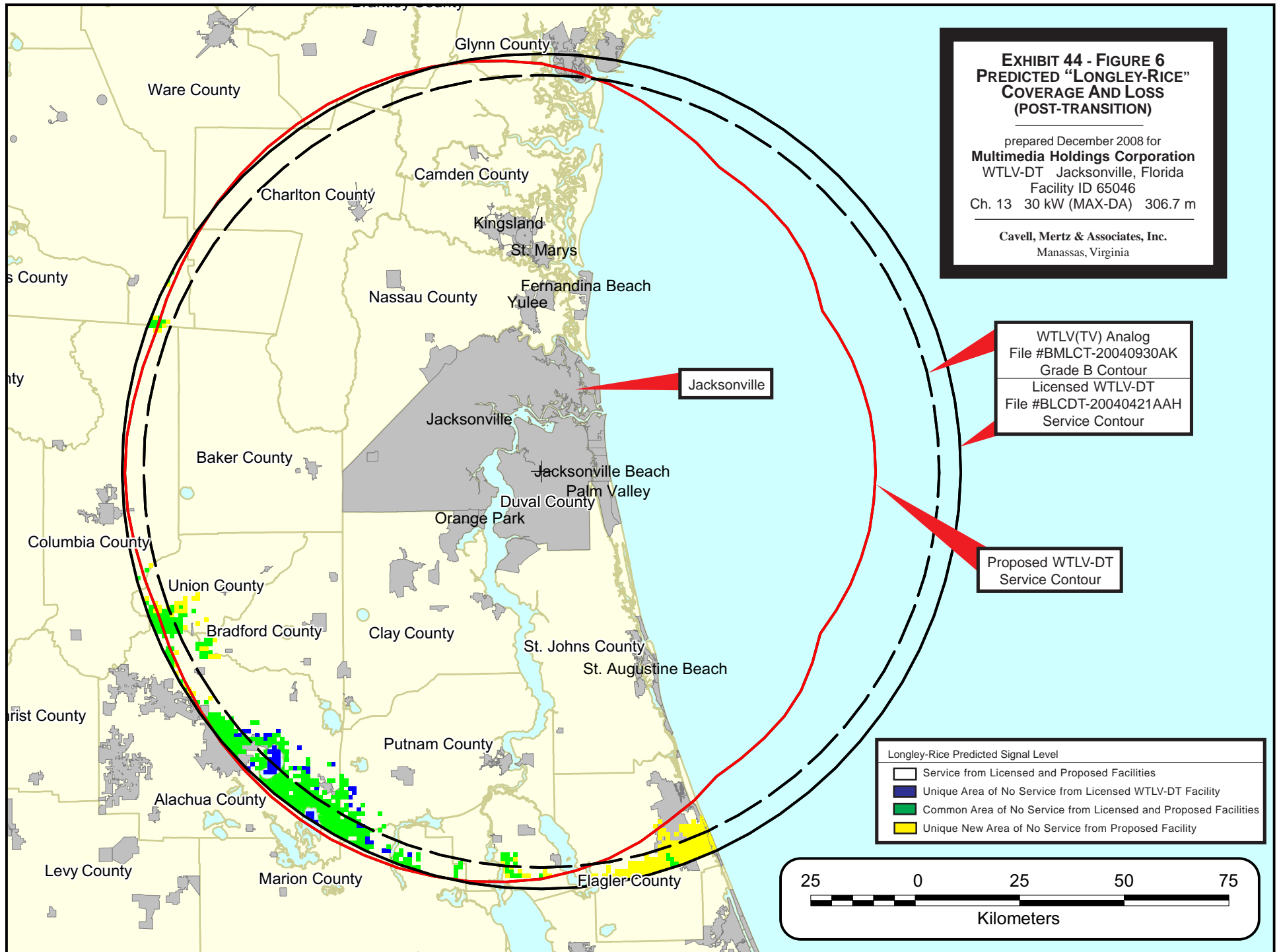
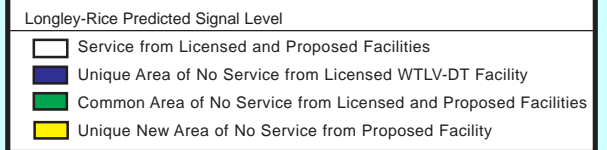


Exhibit 44 – Table 1
INTERFERENCE STUDY SUMMARY AND COMPARISON
PRE-TRANSITION OPERATION

prepared for
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<u>Channel</u>	<u>Call Sign</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Reference No.</u>	WTLV-DT Licensed New <u>Interference</u>	WTLV-DT Proposed New <u>Interference</u>	Net Change in <u>Interference</u>
12 WTLV		Jacksonville, FL	0	LIC	BMLCT -20040930AKX	No Interference	No Interference	
13 WMBB		Panama City, FL	368.3	LIC	BLCT -19900816KE	No Interference	No Interference	
13 WMBB		Panama City, FL	368.3	CP	BPCDT -20080410AAW	No Interference	No Interference	
13 WTVT		Tampa, FL	280.9	LIC	BLCT -1682	1.72	0.46	-1.26
13 WMAZ-TV		Macon, GA	334.7	CP	BPCDT -20080306AAN	0.00	0.00	0.00
13 WMAZ-TV		Macon, GA	334.7	LIC	BLCT -2397	No Interference	0.01	0.01
13 WVAN-DR		Savannah, GA	208.3	LIC	BPRM -20010327AJC	0.16	0.11	-0.05
13 WBFL-CA		Valdosta, GA	179.3	LIC	BLTVL -19990608JE	No Interference	No Interference	

Note: The allotment and construction permit facilities for WEDU(TV), Facility ID 21808, Tampa, FL were eliminated from this pre-transition study. CDBS indicates that the WEDU facilities are designated as "post-transition" and will not become operational until the shutdown of analog stations on February 17, 2009.

Exhibit 44 - Table 2
INTERFERENCE STUDY RESULTS - POST-TRANSITION

prepared for
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<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>
13	WMBB(TV)	Panama City, FL	Reference	721,000	720,559	2,064	1,996	-68	-0.009 %
13	WMBB(TV)	Panama City, FL	BPCDT-20080410AAW	721,000	816,223	3,207	3,204	-3	0.000 %
13	WEDU(TV)	Tampa, FL	Reference	4,123,000	4,116,016	66,010	67,404	1,394	0.034 %
13	WEDU(TV)	Tampa, FL	BPEDT-20080317ACK	4,123,000	4,258,686	157,453	150,807	-6,646	-0.156 %
13	WMAZ-TV	Macon, GA	BMPCDT-20080620AMS	820,000	866,956	75,333	75,575	242	0.028 %
13	WMAZ-TV	Macon, GA	Reference	820,000	802,151	49,117	49,188	71	0.009 %
13	WMAZ-TV	Macon, GA	BPCDT-20080306AAN	820,000	802,080	46,921	46,992	71	0.009 %
13	WBFL-CA	Valdosta, GA	BLTVL-19990608JE				---	No Interference	---
13	WBFL-CA	Valdosta, GA	BSTA-20080411ABX				---	No Interference	---
13	WBFL-CA	Valdosta, GA	BPTVA-20080926AGR				---	No Interference	---