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 53.3 kW (MAX-DA) 290.7 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 BLCDT-20040421AAH). As the Commission is aware, WTLV-DT has experienced antenna problems that have been documented in the Special Temporary Authorization, BDSTA-20070521ADK[1]. The antenna problems require that the WTLV-DT antenna be replaced. Accordingly, *Multimedia* filed an application seeking permission to employ a different replacement antenna (see BPCDT-20081205AGG). Since the application was filed, structural studies were performed on the proposed WTLV replacement antenna and supporting pole. These studies found that the originally specified supporting pole's weight created an unsound structural condition. It became necessary to specify a shorter supporting pole. Thus, the instant amendment specifies a reduced antenna height from that specified in the application so that a shorter, structurally sound, supporting pole can be utilized. A corresponding increase in effective radiated power ("ERP") is also specified.

WTLV-DT is authorized to operate with a common antenna also employed by co-owned WJXX-DT, Channel 10, Facility ID 11893, Orange Park, Florida (see BLCDT-20041102AEE). The common WTLV-DT/WJXX-DT antenna is supported by the existing WTLV(TV) analog antenna which is incapable of supporting the replacement antenna. The existing WTLV(TV) antenna must be remove in order to accommodate the replacement antenna. Based on information provided by a technical representative of *Multimedia*, the replacement antenna is now scheduled for delivery on February 16, 2009. Installation of the replacement antenna is expected to commence within a few days of antenna delivery. Therefore, ***expedited processing of the instant application is hereby respectfully requested on behalf of the applicant***.

[1] As extended by BEDSTA-20080212AAD.

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 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 between the licensed WTLV-DT and the proposed facility. **Exhibit 44-Figure 4** provides a depiction of the FCC defined gain and loss areas using the Commission standard propagation method ("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 (the licensed WTLV-DT service contour) is displayed **Exhibit 44-Figures 5**. 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:

Facility	Interference-Free Population (2000 Census)	Percent Match to Appendix B Facility
WTLV-DT Appendix B Reference Facility	1,381,000	- -
WTLV-DT Licensed Facility (BLCDT-20040421AAH) post-transition	1,375,486	99.6%
WTLV(TV) Licensed Analog Facility (BMLCT-20040930AKX) pre-transition	1,266,329	91.7%
WTLV-DT Proposed Facility post-transition	**1,392,639**	**100.8%**

As shown above, the proposed WTLV-DT facility will cover 100.8% 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 100%, FCC Form 301, Section III-D, Question 1(e) has been answered "yes".

Since actual station coverage is not abruptly cutoff at the predicted service 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 post-transition study were employed as the basis of **Exhibit 44-Figure 5** and are provided in the following table:

Facility	Unique Population Loss Due to Terrain Loss or Interference (2000 Census)	Common Population Loss Due to Terrain Loss or Interference (2000 Census)	Total Population Loss Due to Terrain Loss or Interference (2000 Census)	New Population Gain from Proposed Facility (2000 Census)	Percent Gain From Licensed Digital Contour Population
WTLV-DT Licensed Facility	13,666[2]	14,966[3]	28,662	- -	- -
WTLV-DT Proposed Facility	8,977[4]	14,966[3]	23,973	4,689	0.3%

As shown above, an additional 0.3% in addition to those persons that currently are predicted to receive interference-free coverage within the licensed digital service contour will gain coverage from the proposed facility. Thus, 100% of the persons predicted to now receive "*interference-free*" service from WTLV-DT will continue to receive service.

[2] In Exhibit 44-Figure 5, the blue tinted cells.
[3] In Exhibit 44-Figure 5, the green tinted cells.
[4] In Exhibit 44-Figure 5, the yellow tinted cells.

Concerns have been raised by Commission Staff regarding differences in coverage from the current WTLVTV) analog operation and that proposed herein. **Exhibit 44-Figure 6** depicts the coverage contours of the licensed WTLV(TV) analog facility, the currently licensed WTLV-DT facility, and that of the proposed post-transition digital operation. The loss area between the WTLV(TV) analog Grade B contour and the service contour of the proposed WTLV-DT facility is depicted with yellow colored tinting. WTLV(TV) is an NBC network affiliate. The map also depicts the coverage in the predicted loss area of the digital and analog facilities for WESH(TV), Facility ID 25738, Dayton Beach, Florida, also an NBC network affiliate. As shown, WESH provides coverage in the predicted loss area. Thus, there is no loss of NBC service within the predicted loss area.

Interference studies, in accordance with OET-69, were performed to determine compliance with the currently stated new interference limit of 0.5%. A summary of the results of the OET-69 study for the proposed WTLV-DT facility are provided in the attached **Exhibit 44-Table I**. As demonstrated therein, new interference does not exceed the Commission's 0.5 percent interference. Thus, the instant proposal complies with the Commission's new interference limits. **Post-transition** OET-69 studies employed a **cell size of 2 km** and a **terrain increment of 0.85 km**. *It is respectfully requested that Commission Staff employ these parameters when performing confirming post-transition studies.*

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.

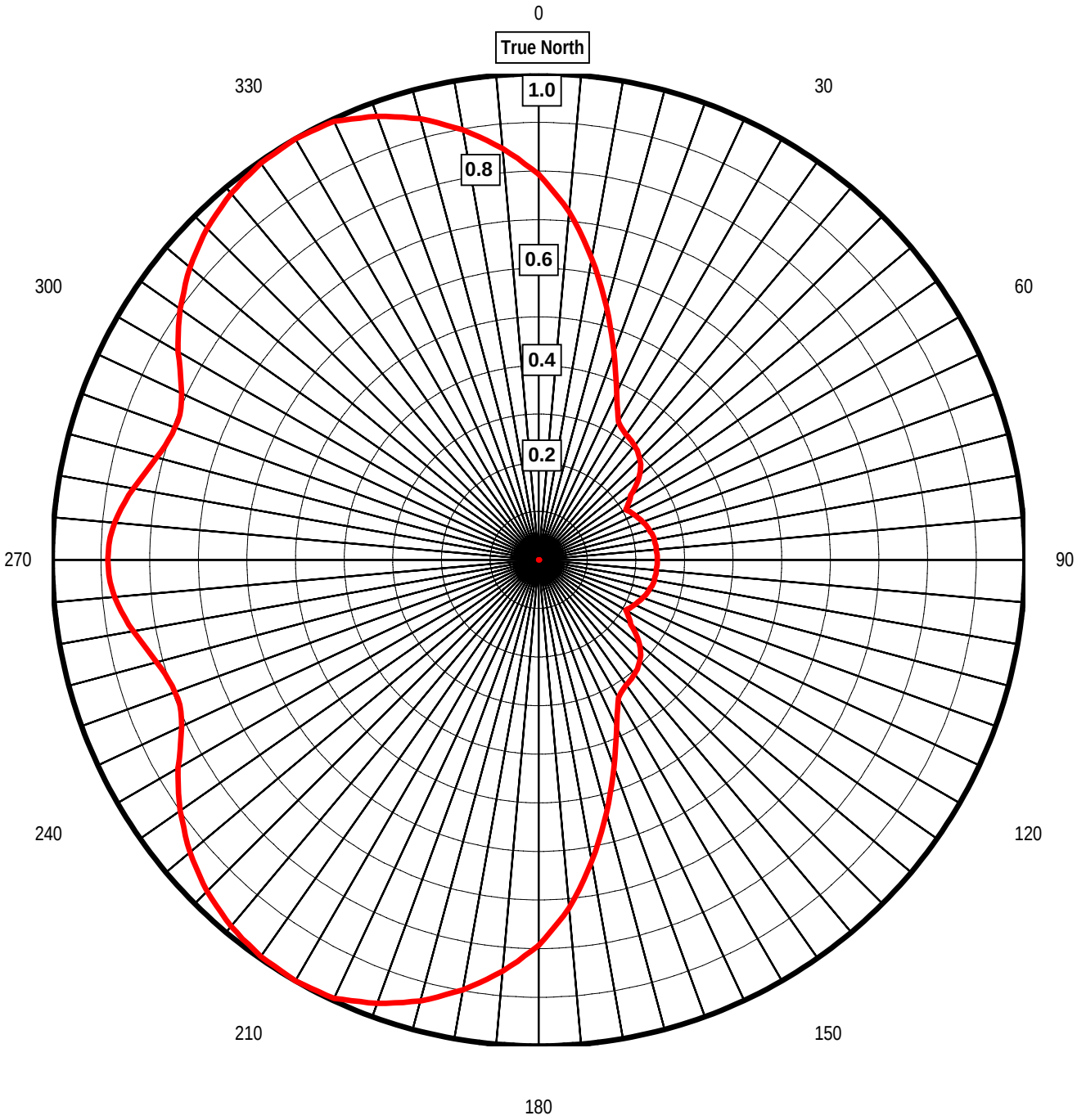


Exhibit 44-Figure 1

ANTENNA HORIZONTAL PLANE
RELATIVE FIELD RADIATION PATTERN

prepared February 2009 for

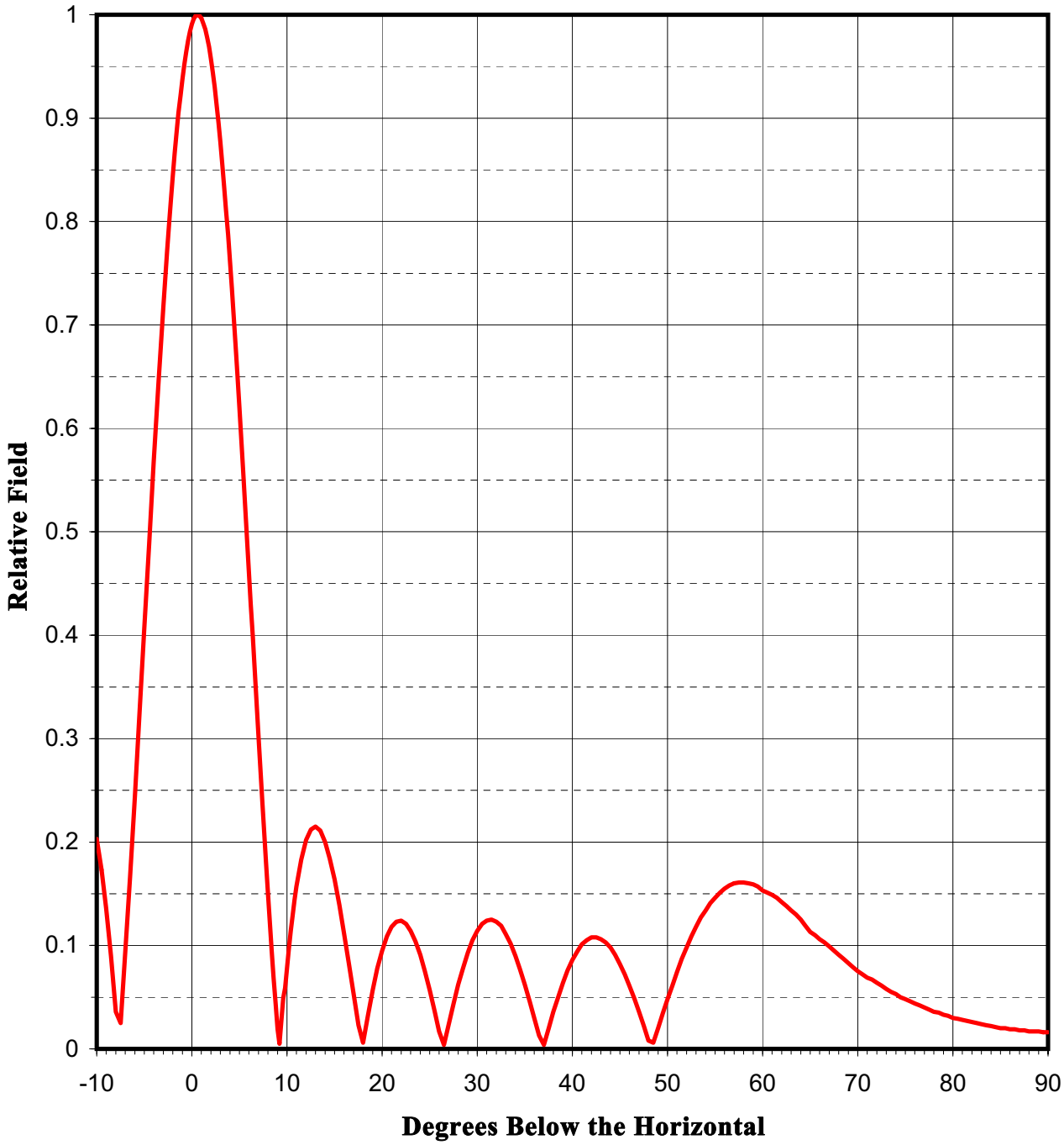
Multimedia Holdings Corporation
WTLV-DT Jacksonville, Florida
Facility ID 65046
Ch. 13 53.3 kW (MAX-DA) 290.7 m

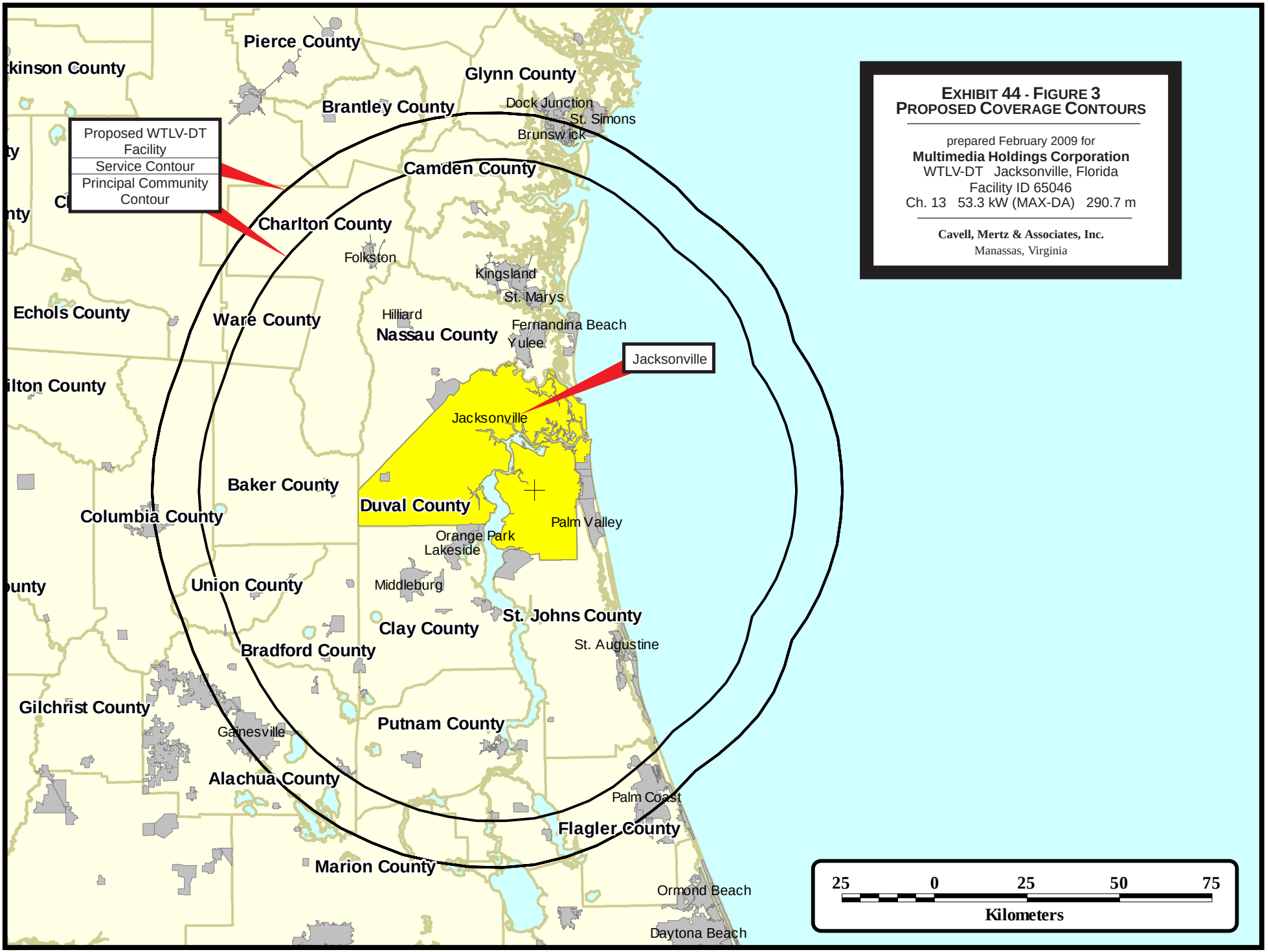
Cavell, Mertz & Associates, Inc.
Manassas, Virginia

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

prepared February 2009 for
Multimedia Holdings Corporation
WTLV-DT Jacksonville, Florida
Facility ID 65046
Ch. 13 53.3 kW (MAX-DA) 290.7 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia




Proposed WTLV-DT Facility
Service Contour
Principal Community Contour
Jacksonville
EXHIBIT 44 - FIGURE 3
PROPOSED COVERAGE CONTOURS
prepared February 2009 for
Multimedia Holdings Corporation
WTLV-DT Jacksonville, Florida
Facility ID 65046
Ch. 13 53.3 kW (MAX-DA) 290.7 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Pierce County
Glynn County
Brantley County
Dock Junction
St. Simons
Brunswick
Camden County
Charlton County
Folkston
Kingsland
St. Marys
Echols County
Ware County
Hilliard
Nassau County
Fernandina Beach
Yulee
Jacksonville
Baker County
Duval County
Palm Valley
Columbia County
Orange Park
Lakeside
Union County
Middleburg
St. Johns County
Clay County
St. Augustine
Bradford County
Gilchrist County
Putnam County
Gainesville
Alachua County
Palm Coast
Flagler County
Marion County
Ormond Beach
Daytona Beach
25 0 25 50 75
Kilometers

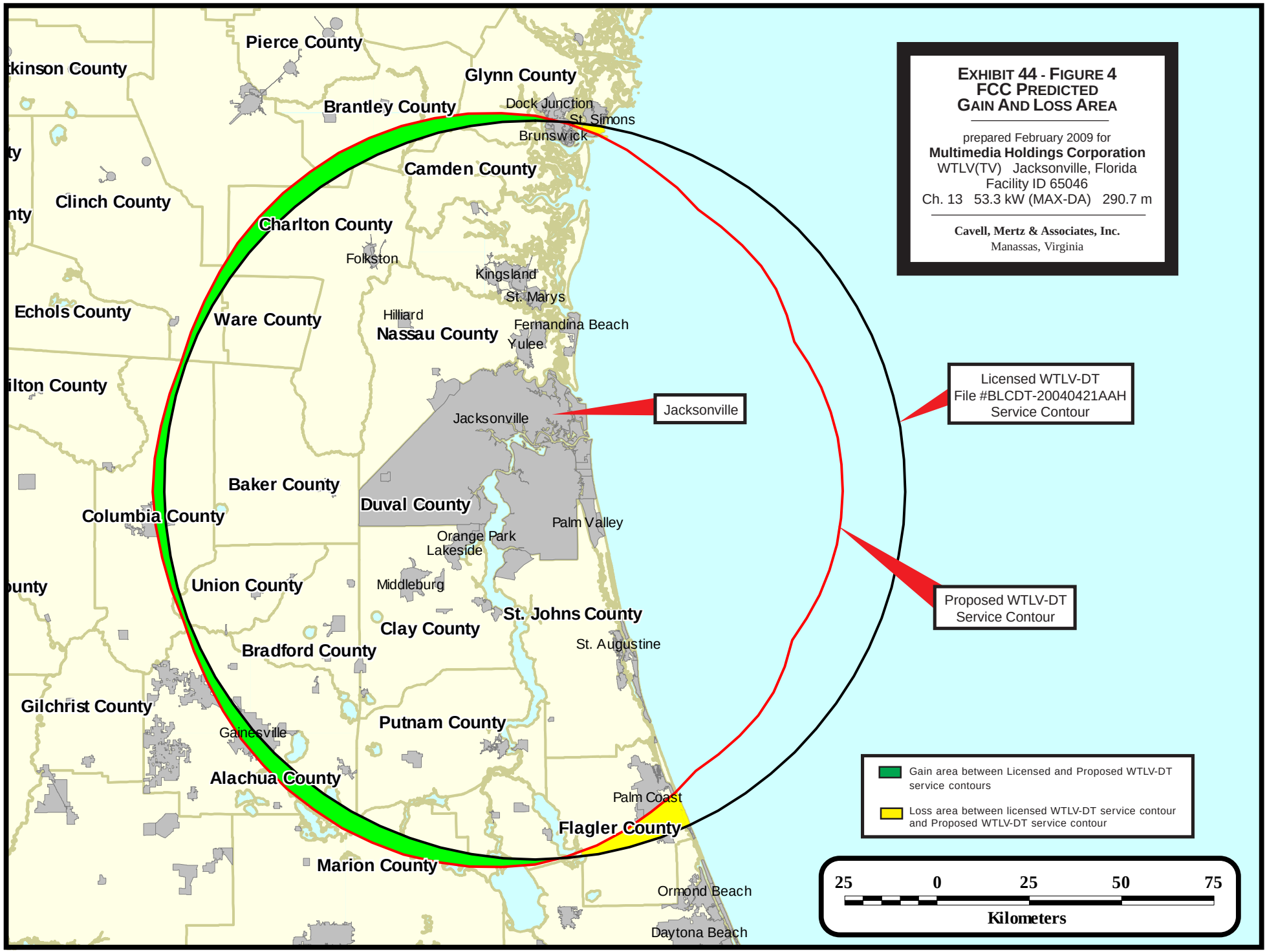


EXHIBIT 44 - FIGURE 4
FCC PREDICTED
GAIN AND LOSS AREA
prepared February 2009 for
Multimedia Holdings Corporation
WTLV(TV) Jacksonville, Florida
Facility ID 65046
Ch. 13 53.3 kW (MAX-DA) 290.7 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Licensed WTLV-DT
File #BLCDT-20040421AAH
Service Contour
Proposed WTLV-DT
Service Contour
Jacksonville
Gain area between Licensed and Proposed WTLV-DT service contours
Loss area between licensed WTLV-DT service contour and Proposed WTLV-DT service contour
25 0 25 50 75
Kilometers
Pierce County
Glynn County
Brantley County
Dock Junction
St. Simons
Brunswick
Camden County
Clinch County
Charlton County
Folkston
Kingsland
St. Marys
Echols County
Ware County
Hilliard
Nassau County
Fernandina Beach
Yulee
Baker County
Duval County
Columbia County
Palm Valley
Orange Park
Lakeside
Union County
Middleburg
St. Johns County
Clay County
St. Augustine
Bradford County
Gilchrist County
Putnam County
Gainesville
Alachua County
Palm Coast
Flagler County
Marion County
Ormond Beach
Daytona Beach

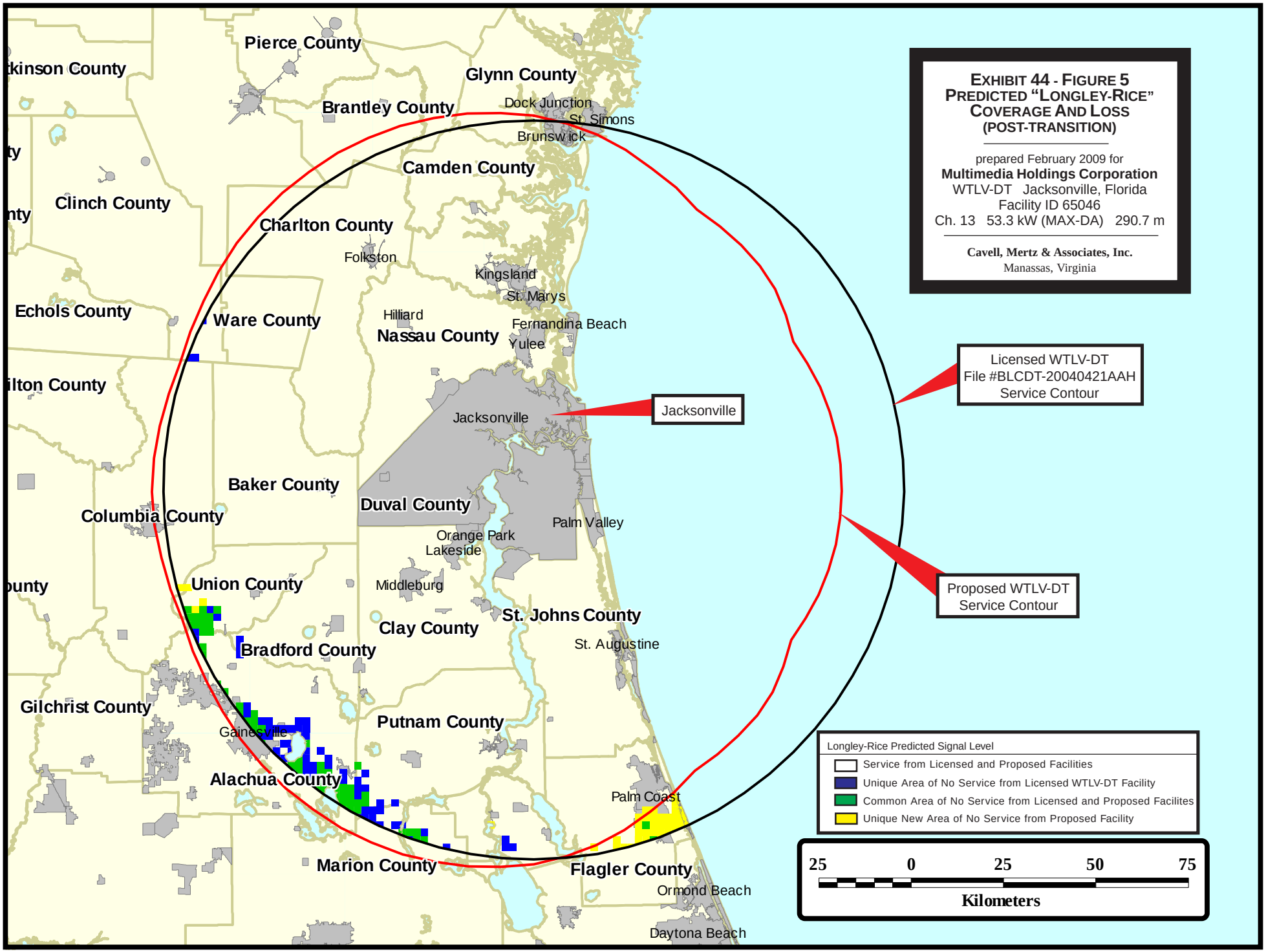


EXHIBIT 44 - FIGURE 5
PREDICTED "LONGLEY-RICE"
COVERAGE AND LOSS
(POST-TRANSITION)
prepared February 2009 for
Multimedia Holdings Corporation
WTLV-DT Jacksonville, Florida
Facility ID 65046
Ch. 13 53.3 kW (MAX-DA) 290.7 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Licensed WTLV-DT
File #BLCDT-20040421AAH
Service Contour
Proposed WTLV-DT
Service Contour
Jacksonville
Pierce County
Glynn County
Brantley County
Dock Junction
St. Simons
Brunswick
Camden County
Clinch County
Charlton County
Folkston
Kingsland
St. Marys
Echols County
Ware County
Hilliard
Nassau County
Fernandina Beach
Yulee
Baker County
Duval County
Columbia County
Palm Valley
Orange Park
Lakeside
Union County
Middleburg
St. Johns County
Clay County
St. Augustine
Bradford County
Gilchrist County
Putnam County
Gainesville
Alachua County
Palm Coast
Marion County
Flagler County
Ormond Beach
Daytona Beach
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 Facilites
Unique New Area of No Service from Proposed Facility
25 0 25 50 75
Kilometers

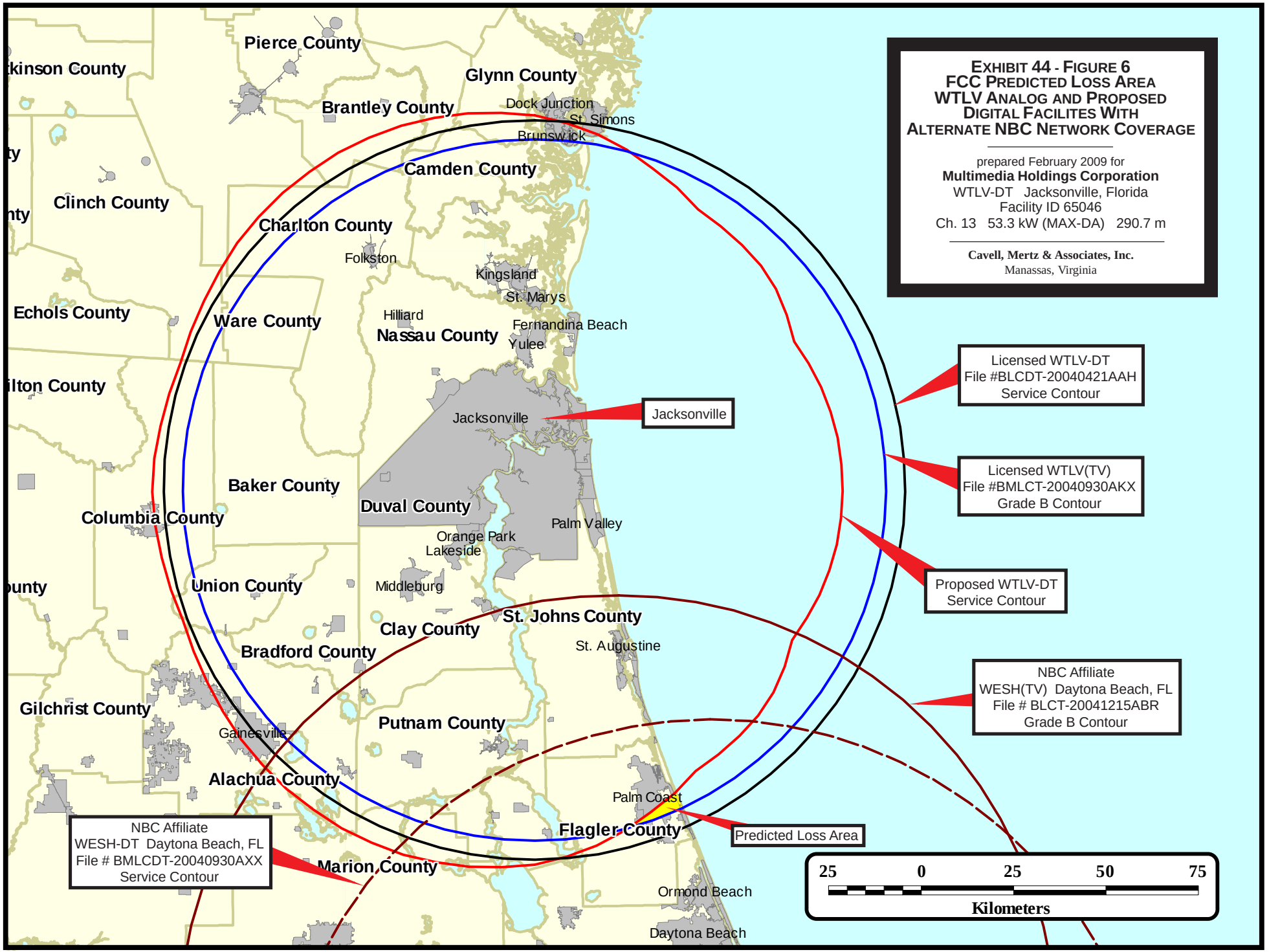


EXHIBIT 44 - FIGURE 6
FCC PREDICTED LOSS AREA
WTLV ANALOG AND PROPOSED
DIGITAL FACILITES WITH
ALTERNATE NBC NETWORK COVERAGE
prepared February 2009 for
Multimedia Holdings Corporation
WTLV-DT Jacksonville, Florida
Facility ID 65046
Ch. 13 53.3 kW (MAX-DA) 290.7 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Licensed WTLV-DT
File #BLCDT-20040421AAH
Service Contour
Jacksonville
Licensed WTLV(TV)
File #BMLCT-20040930AKX
Grade B Contour
Proposed WTLV-DT
Service Contour
NBC Affiliate
WESH(TV) Daytona Beach, FL
File # BLCT-20041215ABR
Grade B Contour
Predicted Loss Area
NBC Affiliate
WESH-DT Daytona Beach, FL
File # BMLCDT-20040930AXX
Service Contour
25 0 25 50 75
Kilometers
Pierce County
Glynn County
Brantley County
Dock Junction
St. Simons
Brunswick
Camden County
Clinch County
Charlton County
Folkston
Kingsland
St. Marys
Echols County
Ware County
Hilliard
Nassau County
Fernandina Beach
Yulee
Jacksonville
Baker County
Duval County
Columbia County
Palm Valley
Orange Park
Lakeside
Union County
Middleburg
St. Johns County
Clay County
St. Augustine
Bradford County
Gilchrist County
Putnam County
Gainesville
Alachua County
Palm Coast
Flagler County
Marion County
Ormond Beach
Daytona Beach

Exhibit 44 - Table I

INTERFERENCE STUDY RESULTS

prepared for

Multimedia Holdings Corporation

WTLV(TV) Jacksonville, FL

Facility Id: 65046

Ch. 13 53.3 kW (MAX-DA) 290.7 m

Channel	Affected Station	City, State	File Number	7th R&O Table Baseline (2000 Census)	Calculated Baseline (2000 Census)	Interference Population without Proposal (2000 Census)	Interference Population with Proposal (2000 Census)	New Interference Population	New Interference Percentage
13	WMBB(TV)	Panama City, FL	Reference	721,000	718,053	4,729	4,737	8	0.001 %
13	WMBB(TV)	Panama City, FL	BPCDT-20080410AAW	721,000	813,444	7,258	7,258	0	0.000 %
13	WEDU(TV)	Tampa, FL	Reference	4,123,000	4,127,008	47,374	59,356	11,982	0.290 %
13	WEDU(TV)	Tampa, FL	BPEDT-20080317ACK	4,123,000	4,252,443	161,743	182,570	20,827	0.490 %
13	WMAZ-TV	Macon, GA	BMPCDT-20080620AMS	820,000	871,829	63,529	64,528	999	0.115 %
13	WMAZ-TV	Macon, GA	Reference	820,000	815,662	32,564	33,183	619	0.076 %
13	WBFL-CA	Valdosta, GA	BLTVL-19990608JE				--- No Interference ---		
13	WBFL-CA	Valdosta, GA	BSTA-20080411ABX		386	170	170	0	0.000 %
13	WBFL-CA	Valdosta, GA	BPTVA-20080926AGR		3,715	67	67	0	0.000 %