

Engineering Statement
REQUEST FOR SPECIAL TEMPORARY AUTHORIZATION
prepared for
Multimedia Holdings Corporation
KUSA-DT
Facility ID: 23074
Ch. 9 45 kW (MAX-DA) 352.4 m

Multimedia Holdings Corporation (“*Multimedia*”) is the licensee of analog television station KUSA-TV, Channel 9, Denver, Colorado (see BLCT-19900801KF). *Multimedia* is also currently authorized to construct the post-transition digital facility for KUSA-TV on Channel 9 (“CP”, BMPCDT-20080620AMC). *Multimedia* intends to terminate analog operation and substitute the authorized post-transition digital CP facility on Channel 9 for pre-transition operation commencing on April 16, 2009.

Accordingly, an interference study was performed to determine if the proposed substitution of the digital facility would create new interference. **Table I** summarizes the results of the interference study performed in accordance with the methods set forth in the Commission’s OET Bulletin No 69 (“OET-69”). As shown, interference is predicted to the licensed and construction permit¹ analog facilities for KUSA. Since the licensed KUSA analog facility will cease operation permitting the use of the digital CP facility, the interference calculation is moot, and is provided for informational purposes only.

*It should be noted that the FCC’s “pre-transition” database contains “post-transition” construction permit records that should be eliminated from consideration when running a confirming OET-69 interference study. A summary of the omitted facilities is provided in **Table II**.*

Table I also shows 35.45% new interference to the Appendix B reference facility² for KKTU-DT, Facility ID 35037, Colorado Springs, CO. During the channel election process, the licensee of KKTU-DT and *Multimedia* entered into an interference agreement that specifies 34.6% interference to KKTU-DT from KUSA (see **Attachment 1**). Thus, the 35.45% predicted interference from the KUSA proposal to KKTU-DT minus the 34.6% interference level specified

¹ The construction permit, BPCT-20020813ABP, expired on December 3, 2006 and does not require further consideration. It was studied for completeness.

² The currently authorized KKTU-DT facility, File No. BLCDDT-20030512ADQ, is identical to the Appendix B facility.

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in the agreement causes an increase in interference of 0.85%, well below the 2% limit. Therefore, the proposed substitution of the authorized KUSA post-transition CP facility for the current analog operation complies with the Commission's requirements.

Issues related to a comparison of digital coverage to the current analog coverage were addressed in the CP application and accepted by Commission Staff. No further discussion on this topic is believed necessary. Other allocation matters and an environmental evaluation have also not been provided since these matters were discussed and accepted by Commission Staff when granting the CP.

Conclusion

As demonstrated above, the temporary pre-transition operation proposed herein, complies with current Commission policy.

Certification

The undersigned hereby certifies that the foregoing statement and exhibits were prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Mertz is a principal in the firm of *Cavell, Mertz & Associates, Inc.*, holds a Bachelor of Science degree from Oglethorpe University, and has submitted numerous engineering exhibits to the Federal Communications Commission. His qualifications are a matter of record with that agency.



Richard H. Mertz
March 16, 2009

Cavell, Mertz & Associates, Inc.
7839 Ashton Avenue
Manassas, Virginia 20109
703-392-9090

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Attachments

Table I	Interference Study Results
Table II	Interference Study Post-Transition Facilities to be Omitted
Attachment I	Interference Agreement

Table 1
INTERFERENCE STUDY RESULTS
 prepared for
Multimedia Holdings Corporation
 KUSA-DT Denver, CO
 Facility Id: 23074
 Ch. 9 45 kW (MAX-DA) 352.4 m
 Construction Permit BMPCDT-20080620AMC

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (1990 Census)</u>	<u>Interference Population without Proposal (1990 Census)</u>	<u>Interference Population with Proposal (1990 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
8	KTSC(TV)	Pueblo, CO	BLET-20010111ABS	646,677	1,053,116	1,053,116	0	0.000 %
9	¹ KUSA-TV	Denver, CO	BPCT-20020813ABP	2,196,827	40,571	2,135,780	2,095,209	89.492 %
9	² KUSA-TV	Denver, CO	BLCT-19900801KF	2,210,456	22,806	2,123,004	2,100,198	91.289 %
9	NEW(TV)	Ouray, CO	BPRM-20021009ABH			---	No Interference	---
9	KFNR-DT	Rawlins, WY	Reference			---	No Interference	---
10	³ KKTV-DT	Colorado Springs, CO	Reference	1,077,269	515,036	887,171	372,135	35.449 %
10	KSBS-DT	Steamboat Springs, CO	Reference			---	No Interference	---

Notes:

1. BPCT-20020813ABP is an analog construction permit for KUSA. This permit expired on December 3, 2006 and does not warrant further consideration.
2. BLCT-19900801KF is the current licensed analog facility for KUSA. The digital facility proposed herein for pre-transition operation is intended to replace the KUSA analog facility on Channel 9.
3. An interference agreement exists between Multimedia Holdings Corporation and Gray Television Licensee, Inc., licensee of KKTV-DT, which permits KUSA-DT's post-transition allotment facility to cause 34.6% interference. Thus, the instant proposal causes an increase of only 0.85% new interference and, thus, complies with the Commission's policies.

Table II
INTERFERENCE STUDY
POST-TRANSITION FACILITIES TO BE OMITTED
 prepared for
Multimedia Holdings Corporation
 KUSA-DT
 Facility ID: 23074
 Ch. 9 45 kW (MAX-DA) 352.4 m

<u>Chan</u>	<u>Call</u>	<u>City/State</u>	<u>Status</u>	<u>Application Ref. No.</u>
8	KTSC	PUEBLO CO	APP	BMPEDT -20090223ABD
8	KTSC	PUEBLO CO	CP MOD	BMPEDT -20080618ATA
8	KWYP-TV	LARAMIE WY	CP MOD	BMPEDT -20080617ADF
9	KUSA-TV	DENVER CO	CP	BPCDT -20080416ABB
9	KUSA-TV	DENVER CO	CP MOD	BMPCDT -20080620AMC
9	KPNE-TV	NORTH PLATTE NE	CP MOD	BMPEDT -20080620AAZ

NEGOTIATED CONFLICT RESOLUTION AGREEMENT

This Negotiated Conflict Resolution Agreement ("Agreement") is entered into as of July 18, 2005 by and between Multimedia Holdings Corporation ("MHC"), and Gray Television Licensee, Inc. ("GTL").

1. MHC is the licensee of Station KUSA-TV and KUSA-DT, FCC Facility ID No. 23074, Denver, Colorado, which is authorized by the Federal Communications Commission ("FCC") to operate on NTSC Channel 9 and on digital television ("DTV") Channel 16. In the first round of the FCC's DTV channel election process, KUSA elected its NTSC Channel 9 for post-transition DTV operations.

2. GTL is the licensee of Station KKTU-TV and KKTU-DT, FCC Facility ID No. 35037, Colorado Springs, Colorado, which is authorized by the FCC to operate on NTSC Channel 11 and on DTV Channel 10. In the first round of the FCC's DTV channel election process, KKTU elected its DTV Channel 10 for post-transition DTV operations.

3. KUSA has been notified by the FCC that its proposed digital operation on its elected NTSC Channel 9 would result in 34.6% interference to KKTU's proposed digital operation on its elected DTV Channel 10.

4. Each of the parties wishes to retain its respective first round DTV channel election. Accordingly, in order to resolve their conflict, MHC and GTL hereby agree to accept any interference which would result from KUSA's currently proposed digital operation on NTSC Channel 9 and KKTU currently proposed digital operation on DTV Channel 10.

5. Except for the mutual agreement set forth in Paragraph 4, no consideration is being paid or promised by either party in connection with this Agreement.

6. The parties shall each seek the FCC's approval of this Agreement by submission of an FCC Form 383 ("Digital Channel Election for Television Broadcast Station: First Round Conflict Decision") by August 8, 2005. The parties also agree that they will cooperate with each other to provide the FCC with all other information (including, without limitation, a copy of this Agreement) which the FCC may request in connection with the parties' respective DTV channel elections.

MULTIMEDIA HOLDINGS CORPORATION

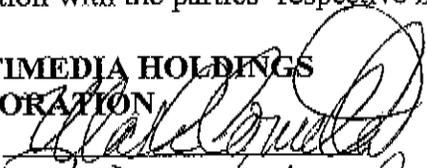
By:

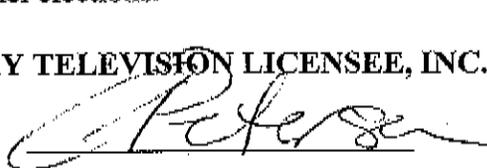
Title:
72407

GRAY TELEVISION LICENSEE, INC.

By:

Title:


President & General Manager


GENERAL MANAGER KKTU

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

7.1. Channel:
9

7.2. Zone: I II III

7.3. Antenna Location Coordinates: (NAD 27)
Latitude:
Degrees 39 Minutes 43 Seconds 50.6 North South

Longitude:
Degrees 105 Minutes 13 Seconds 53.6 West East

7.4. Antenna Structure Registration Number: 1058328
 Not Applicable Notification filed with FAA

7.5. Antenna Location Site Elevation Above Mean Sea Level: 2169 meters

7.6. Overall Tower Height Above Ground Level: 223.8 meters

7.7. Height of Radiation Center Above Ground Level: 192 meters

7.8. Height of Radiation Center Above Average Terrain: 352.4 meters

7.9. Maximum Effective Radiated Power (average): 45 kW

7.10. Antenna Specifications:
 Nondirectional Directional
a. Manufacturer DIE Model DCBR-C3-4HA/12H-2-B
b. Electrical Beam Tilt:
1.0 degrees Not Applicable
c. Mechanical Beam Tilt:
degrees toward azimuth
degrees True Not Applicable
d. Polarization:
 Horizontal Circular Elliptical

Directional Antenna Relative Field Values:
Rotation (Degrees): No Rotation

Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0	1.000	10	0.944	20	0.779	30	0.770	40	0.963	50	0.963
60	0.770	70	0.779	80	0.944	90	1.000	100	0.944	110	0.779
120	0.770	130	0.963	140	0.963	150	0.770	160	0.779	170	0.944
180	1.000	190	0.970	200	0.883	210	0.750	220	0.587	230	0.413
240	0.250	250	0.117	260	0.030	270	0.001	280	0.030	290	0.117
300	0.250	310	0.413	320	0.587	330	0.750	340	0.883	350	0.970
Additional Azimuths		25	0.733	45	1.000	65	0.733	115	0.733	135	1.000

8. Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought [Exhibit 21]

9. Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. Yes No

I certify that I have prepared Engineering Data on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name RICHARD H. MERTZ	Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature	Date (mm/dd/yyyy) 03/16/2009	
Mailing Address CAVELL, MERTZ & ASSOCIATES, INC. 7839 ASHTON AVENUE		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20109 -
Telephone Number (No dashes or parentheses, include area code) 7033929090	E-Mail Address (if available) RMERTZ@CAVELLMERTZ.COM	

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing TODD A. MAYMAN	Typed or Printed Title of Person Signing SECRETARY
Signature	Date (mm/dd/yyyy)

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 21

Description: STA CIRCUMSTANCES

KUSA-TV INTENDS TO TERMINATE ANALOG SERVICE AND COMPLETE AN EARLY TRANSITION TO DIGITAL-ONLY OPERATIONS ON ITS POST-TRANSITION DTV CHANNEL (9) ON APRIL 16, 2009, PURSUANT TO THE REQUIREMENTS AND PROCEDURES SET FORTH IN THE FCC ORDER IN DOCKET NO. 09-17, (FCC 09-19, RELEASED MARCH 13, 2009).

OPERATING CONDITION 2 ON THE KUSA CONSTRUCTION PERMIT (BMPCDT-20080620AMC) STATES THAT KUSA MAY NOT OPERATE ITS CHANNEL 9 DIGITAL FACILITIES BEFORE THE END OF THE TRANSITION, NOW JUNE 12, 2009, WITHOUT THE COMMISSION'S PRIOR APPROVAL. ACCORDINLY, KUSA SEEKS THE INSTANT STA.

AN ENGINEERING STUDY HAS BEEN COMPLETED BY THE LICENSEE'S TECHNICAL CONSULTANT, RICHARD MERTZ AT CAVELL, MERTZ & ASSOCIATES, INC., WHICH CONFIRMS THAT OPERATIONS ON DIGITAL CHANNEL 9 WILL NOT CAUSE IMPERMISSIBLE LEVELS OF INTERFERENCE IN THE PRE-TRANSITION ENVIRONMENT. A STATEMENT BY MR. MERTZ TO THAT EFFECT IS ATTACHED.

Attachment 21
