

Engineering Exhibit

**AMENDMENT TO AN APPLICATION FOR
CONSTRUCTION PERMIT FOR A
DIGITAL TELEVISION STATION**

prepared for
Multimedia Holdings Corporation

KPNX(TV) Mesa, Arizona

Facility ID 35486
Ch. 12 39 kW 555 m

Table of Contents

FCC Form 301 - Section III-D

Exhibit 44

| | |
|-------------|--|
| Statement A | Nature Of The Proposal, Proposed Antenna System |
| Figure 1 | Proposed Coverage Contours |
| Figure 2 | Coverage Contour Comparison |
| Table I | Post-Transition Interference Study Results Summary |

Exhibit 46

| | |
|-------------|------------------------------|
| Statement B | Environmental Considerations |
|-------------|------------------------------|

This material supplies a "hard copy" of the engineering portions of this application as entered January 15, 2009 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.

SECTION III-D - DTV Engineering

Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.

| | |
|--|--|
| 1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects: | |
| (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| (b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. | <input type="radio"/> Yes <input type="radio"/> No |
| (c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. | <input type="radio"/> Yes <input type="radio"/> No |
| (d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"). | <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A |
| (e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B. | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A |
| 2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. | <input checked="" type="radio"/> Yes <input type="radio"/> No |

SECTION III-D - DTV Engineering

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

| |
|--|
| 1. Channel Number: DTV 12 Analog TV, if any 12 |
| 2. Zone: <input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III |
| 3. Antenna Location Coordinates: (NAD 27) Latitude: Degrees 33 Minutes 20 Seconds 00 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 112 Minutes 03 Seconds 48 <input checked="" type="radio"/> West <input type="radio"/> East |
| 4. Antenna Structure Registration Number: 1002073 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA |
| 5. Antenna Location Site Elevation Above Mean Sea Level: 808.6 meters |
| 6. Overall Tower Height Above Ground Level: 117.4 meters |
| 7. Height of Radiation Center Above Ground Level: 104 meters |
| 8. Height of Radiation Center Above Average Terrain : 555 meters |
| 9. Maximum Effective Radiated Power (average power): 39 kW |
| 10. Antenna Specifications: a. Manufacturer DIE Model TW-15B12 b. Electrical Beam Tilt: 0.8 degrees <input type="checkbox"/> Not Applicable c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). d. Polarization: _ _ |

[Exhibit
42]

Horizontal Circular Elliptical

e. Directional Antenna Relative Field Values: Not applicable (Nondirectional)

[For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.]
[Relative Field Values]

10e. Directional Antenna Relative Field Values

[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]

e. Directional Antenna Relative Field Values:

Rotation (Degrees): No Rotation

| Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value |
|---------------------|-------|---------|-------|---------|-------|---------|-------|---------|-------|---------|-------|
| 0 | | 10 | | 20 | | 30 | | 40 | | 50 | |
| 60 | | 70 | | 80 | | 90 | | 100 | | 110 | |
| 120 | | 130 | | 140 | | 150 | | 160 | | 170 | |
| 180 | | 190 | | 200 | | 210 | | 220 | | 230 | |
| 240 | | 250 | | 260 | | 270 | | 280 | | 290 | |
| 300 | | 310 | | 320 | | 330 | | 340 | | 350 | |
| Additional Azimuths | | | | | | | | | | | |

[Relative Field Polar Plot](#)

If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. **Exhibit required.** [Exhibit 43]

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? Yes No [Exhibit 44]

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. [Exhibit 45]
(Applicable only if **Certification Checklist** item 3 is answered "No.")

13. **Environmental Protection Act. Submit in an Exhibit** the following: [Exhibit 46]
If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (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 1/15/2009 | |
| Mailing Address CAVELL, MERTZ & ASSOCIATES, INC. 7839 ASHTON AVENUE | | |
| City MANASSAS | State or Country (if foreign address) VA | Zip Code 20109 - |
| Telephone Number (include area code) 7033929090 | E-Mail Address (if available) RMERTZ@CAVELLMERTZ.COM | |

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 1

Description: NATURE OF AMENDMENT - 1/2009

DESCRIPTION: NATURE OF AMENDMENT - 1/2007

THE INSTANT APPLICATION REQUESTS A CP FOR POST-TRANSITION OPERATION ON DIGITAL CHANNEL 12 WITH 43 KW ERP. THIS AMENDMENT IS FILED TO REDUCE THE PROPOSED MAXIMIZED ERP TO 33.9 KW, WHICH PRODUCES A COVERAGE AREA IN SQUARE KILOMETERS EQUAL TO BUT NOT EXCEEDING THAT OF THE LARGEST DTV FACILITY IN THE MARKET -- THE DTV APPENDIX B FACILITIES OF STATION KMOH-DT. APPLICANT HAS BEEN ADVISED THAT COORDINATION WITH MEXICO HAS BEEN COMPLETED AND THAT MEXICO HAS CONSENTED TO 40 KW FOR DIGITAL CHANNEL 12 OPERATION AT THE PROPOSED SITE.

Attachment 1

Exhibit 5

Description: NEWSPAPER/BROADCAST CROSS-OWNERSHIP

THE LICENSEE'S PARENT COMPANY, GANNETT CO., INC., ALSO OWNS THE ARIZONA REPUBLIC, A DAILY NEWSPAPER SERVING THE PHOENIX, ARIZONA, METROPOLITAN AREA. THE GRADE A CONTOUR OF KPNX ENCOMPASSES PHOENIX, WHERE THE NEWSPAPER IS PUBLISHED. THEREFORE, COMMON OWNERSHIP OF STATION KPNX AND THE NEWSPAPER IS GOVERNED BY THE NEWSPAPER/BROADCAST CROSS-OWNERSHIP RULE. A REQUEST FOR PERMANENT WAIVER OF SECTION 73.3555(D) OF THE COMMISSION'S RULES WAS GRANTED IN THE COMMISSION'S REPORT AND ORDER AND ORDER ON RECONSIDERATION OF THE NEWSPAPER/BROADCAST CROSS-OWNERSHIP RULE, (SEE FCC 07-216, PARAGRAPH 77).

Attachment 5

Exhibit 44

Description: KPNX AMENDMENT EXHIBIT 44

EXHIBIT 44 CONTAINS STATEMENT A, NATURE OF THE PROPOSAL, PROPOSED ANTENNA SYSTEM, FIGURES 1 AND 2, AND TABLE I.

Attachment 44

| Description |
|---|
| KPNX Amendment Exhibit 44 |

Exhibit 46

Description: KPNX AMENDMENT EXHIBIT 46

EXHIBIT 46 CONTAINS THE TABLE OF CONTENTS, STATEMENT B, ENVIRONMENTAL CONSIDERATIONS, AND A COPY OF THE ENGINEERING PORTIONS OF THE FORM.

Attachment 46

| Description |
|---|
| KPNX Amendment Exhibit 46 |

Exhibit 46 – Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Multimedia Holdings Corporation
KPNX(TV) Mesa, Arizona
Facility ID: 35486
Ch. 12 39 kW 555 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Nature of The Proposal

Multimedia Holdings Corporation (“*Multimedia*”) herein proposes to operate its post-transition Channel 12 digital operation for KPNX(TV) from an existing tower (see Antenna Structure Registration Number 1002073). The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Since no change in overall structure height is proposed, no change in current structure marking and lighting requirements is anticipated.

Human Exposure to Radiofrequency Radiation

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 (“OET 65”). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The existing KPNX analog antenna will be employed for the proposed post-transition operation and will have a center of radiation 104 meters above ground level. An ERP of 39 kilowatts, horizontally polarized, will be employed. Based on information provided by the antenna manufacturer, the antenna has a maximum vertical plane (elevation) relative field of 20 percent or less from 15 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 20 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 12 (center frequency 207 MHz) is 200 $\mu\text{W}/\text{cm}^2$.

Exhibit 46 – Statement B

(Page 2 of 3)

OET 65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the average power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

| | | |
|-----|---|---|
| S | = | power density in microwatts/cm ² |
| ERP | = | total (average) ERP in Watts |
| F | = | relative field factor |
| D | = | distance in meters |

Using this formula, the proposed facility would contribute a power density of 5.0 μW/cm² at two meters above ground level near antenna support structure, or 2.5 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of the any other facilities using this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will continue to be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will continue to be posted.

Exhibit 46 – Statement B

(Page 3 of 3)

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.