

Exhibit 44 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Multimedia Holdings Corporation
KPNX(TV) Mesa, Arizona
Facility ID: 35486
Ch. 12 21.5 kW 555 m

Multimedia Holdings Corporation (“*Multimedia*”) is the licensee of analog television station KPNX(TV), Channel 12, Mesa, Arizona. (see BLCT-20000711ABX). *Multimedia* herein respectfully requests authorization to construct its post-transition facility for KPNX(TV) in accordance the “Filing Freeze Waiver” policy in the Commission’s Third Periodic Review¹. The proposed facility will, of necessity, extend the noise-limited Appendix B² service contour. *Multimedia* proposes to locate its post-transition facility for KPNX(TV) at the existing Channel 12 analog site and to employ the existing Channel 12 non-directional antenna. The facility proposed herein will commence operation promptly following the Congressionally mandated termination by February 17, 2009 of analog transmissions on Channel 12 and pre-transition digital operations on Channel 36.

The location proposed for KPNX(TV)’s post-transition facility is the currently authorized KPNX(TV) analog site. The tower is registered with the FCC as Antenna Structure Registration Number 1002073. *Multimedia* will employ the currently authorized analog Channel 12 non-directional antenna for the proposed KPNX(TV) post-transition digital facility. The antenna is a Dielectric TW-15B12 which is considered non-directional in the horizontal plane with 0.8° of electrical beam tilt.

Exhibit 44 - Figure 1 provides a map depicting the service contour of the proposed facility. Also depicted on the map is the service contour for the Appendix B facility along with the “5 mile” extension of that contour. The existing analog Grade B contour is also shown. As demonstrated on the map, the proposed facility comes as close as possible to achieving replication of the Grade B contour using the existing KPNX(TV) Channel 12 non-directional

¹ See paragraphs 151 and 152, *Report and Order, Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion To Digital Television*, MB Docket No. 07-91, FCC 07-228, Released December 31, 2007.

² See *Seventh Report And Order and Eighth Further Notice of Proposed Rule Making, Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 07-138, released August 6, 2007.

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antenna. Further, the service contour for the proposed facility does not extend past the “5 mile” extension of the Appendix B service contour. Accordingly, **Exhibit 44 - Table I** provides the results of the required interference study. As demonstrated therein, the proposed facility complies with the Commission’s stated “Filing Freeze Waiver” policy in that it does not create new interference in excess of the stated 0.5% limit.

Exhibit 44 - Figure 1 also provides the proposed facility’s principal community coverage contour. As demonstrated therein, the principal community of Mesa, Arizona is predicted to receive the enhanced signal level as required in §73.625(a) of the Commission’s Rules.

The proposed KPNX(TV) site is located 173.8 km from the nearest points on the U. S. – Mexican border and is listed in Appendix D4 of the *Seventh Report and Order*³ of stations in Border Zones that must file post-transition applications. *Multimedia* respectfully requests that International coordination with Mexico be conducted as necessary.

The nearest FCC monitoring station is at Douglas, Arizona, a distance of 304.5 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 area specified in §73.1030(b). Thus, notification of the instant proposal to Table Mountain at Boulder, Colorado 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.

³ Id., Appendix D4, p. 112.

**EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS**

prepared March 2008 for
Multimedia Holdings Corporation
 KPNX(TV) Mesa, Arizona
 Ch. 12 21.5 kW 555 m
Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Proposed KPNX(TV) Facility
 Ch. 12 21.5 kW 555 m
 36 dBu F(50,90) Service Contour
 43 dBu F(50,90) Principal Community
 Coverage Contour

KPNX(TV) 7th R&O Allotment
 Ch. 12 22 kW 543 m
 (Hidden)
 Service Contour extended 5 miles
 36 dBu F(50,90) Service Contour

KPNX(TV) Licensed Facility
 Ch. 12 316 kW 555 m
 56 dBu F(50,50) Grade B Contour

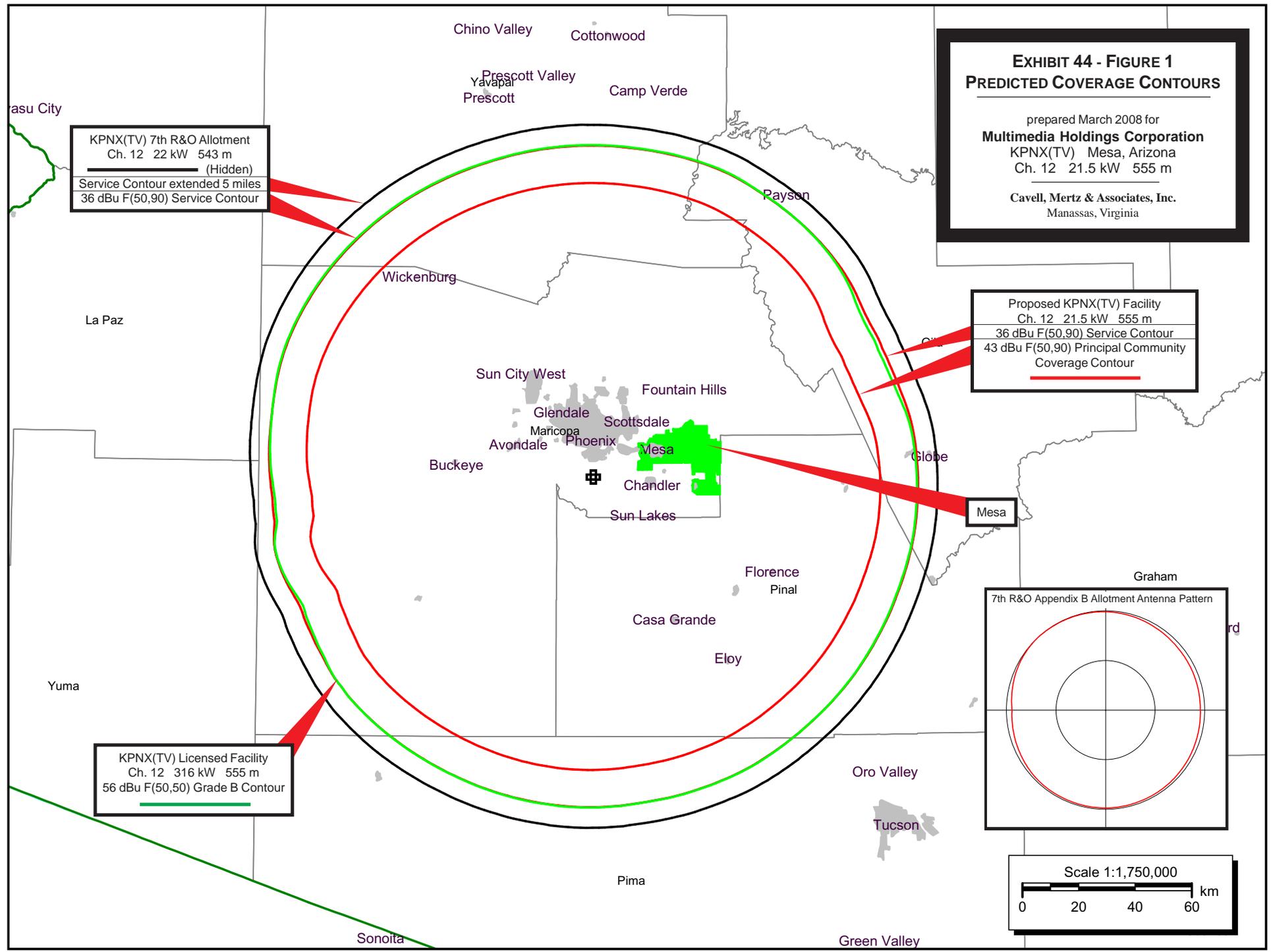
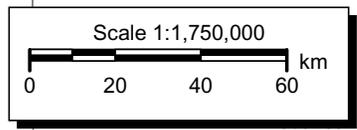
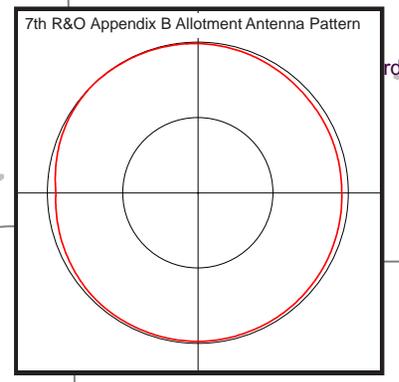


Exhibit 44 – Table I
INTERFERENCE STUDY RESULTS
 prepared for
Multimedia Holdings Corporation
 KPNX(TV) Mesa, Arizona
 Facility ID: 35486
 Ch. 12 21.5 kW 555 m

<u>Channel</u>	<u>Affected Station</u>	<u>City</u>	<u>State</u>	<u>7th R&O Table Baseline (2000 Census)</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population 7th R&O facility (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>Population Difference</u>	<u>New Interference</u>
12	KOBG-TV	Silver City	NM	58,000	58,246	0	28	28	0.048%
13	KFPH-TV	Flagstaff	AZ	203,000		---No interference---			