

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 43 kW 555 m

Multimedia Holdings Corporation (“*Multimedia*”) is the licensee of analog television station KPNX(TV), Channel 12, Mesa, Arizona (see BLCT-20000711ABX). *Multimedia* is also requesting authorization to construct the post-transition digital facility for KPNX(TV) on Channel 12 (see BPCDT-20080321ADA). With the lifting of the filing freeze¹, *Multimedia* herein proposes to amend its pending its pending post-transition application to specify a maximized post-transition operation for KPNX(TV) from the existing tower (see Antenna Structure Registration Number 1002073). The proposed facility will become operational following the Congressionally mandated shut down of all full service analog television stations on February 17, 2009.

Exhibit 44 - Figure 1 provides a map depicting the service contour for the proposed facility along with 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 facility is predicted to provide interference free service to 3,247,971 persons, which is 100.4 percent of the 3,236,000 persons that are predicted to receive interference free service from the Appendix B facility².

The proposed antenna is a Dielectric TW-15B12 which is non-directional in the horizontal plane and is horizontally polarized with 0.8° of electrical beam tilt.

Since the proposed facility extends the service contour past that currently authorized for the Appendix B facility, post-transition interference studies were performed in accordance with the methods set forth in the Commission’s OET Bulletin No 69 (“OET-69”). The results of the studies indicate that no new interference in excess of the 0.5% limit established in the Commission’s Third

¹ See *Public Notice, Commission Lifts The Freeze On The Filing Of Maximization Applications And Petitions For Digital Channel Substitutions, Effective Immediately*, DA 08-1213, Released May 30, 2008.

² See *Memorandum Opinion And Order On Reconsideration of the Seventh Report and Order and Eighth Report And Order, Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, FCC 08-72, Released March 6, 2008

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Periodic Review³ is caused to affected stations by the post-transition KPNX(TV) operation. A summary of the post-transition interference study is provided in the attached **Exhibit 44 - Table I**.

The proposed 43 kW ERP exceeds the maximum permitted for the proposed antenna HAAT of 555 meters as discussed in §73.622(f)(7)(i). However, §73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the station having the largest coverage area within the same market. In this case, the largest service area is that of the licensed analog facility for KTVK(TV) (Ch. 3, Phoenix, AZ, 0.08 km distant, 100 kW ERP / 542 meters HAAT). The area within the proposed KPNX 36 dB μ service contour is 47,313.9 square kilometers, which does not exceed the 47,532.1 square kilometers of area within the licensed KTVK(TV) 47 dB μ Grade B contour. The attached **Exhibit 44 - Figure 2** provides a map which depicts the coverage contours for these facilities. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

The proposed KPNX(TV) digital Channel 12 site is located less than 400 km from the nearest point on the international border with Mexico. Thus, international coordination is respectfully requested. The nearest FCC monitoring station is Douglas, AZ at a distance of 304 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. There are no AM stations located within 3.2 km of the existing tower site.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.

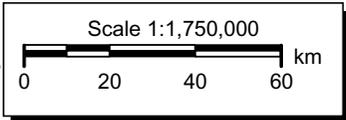
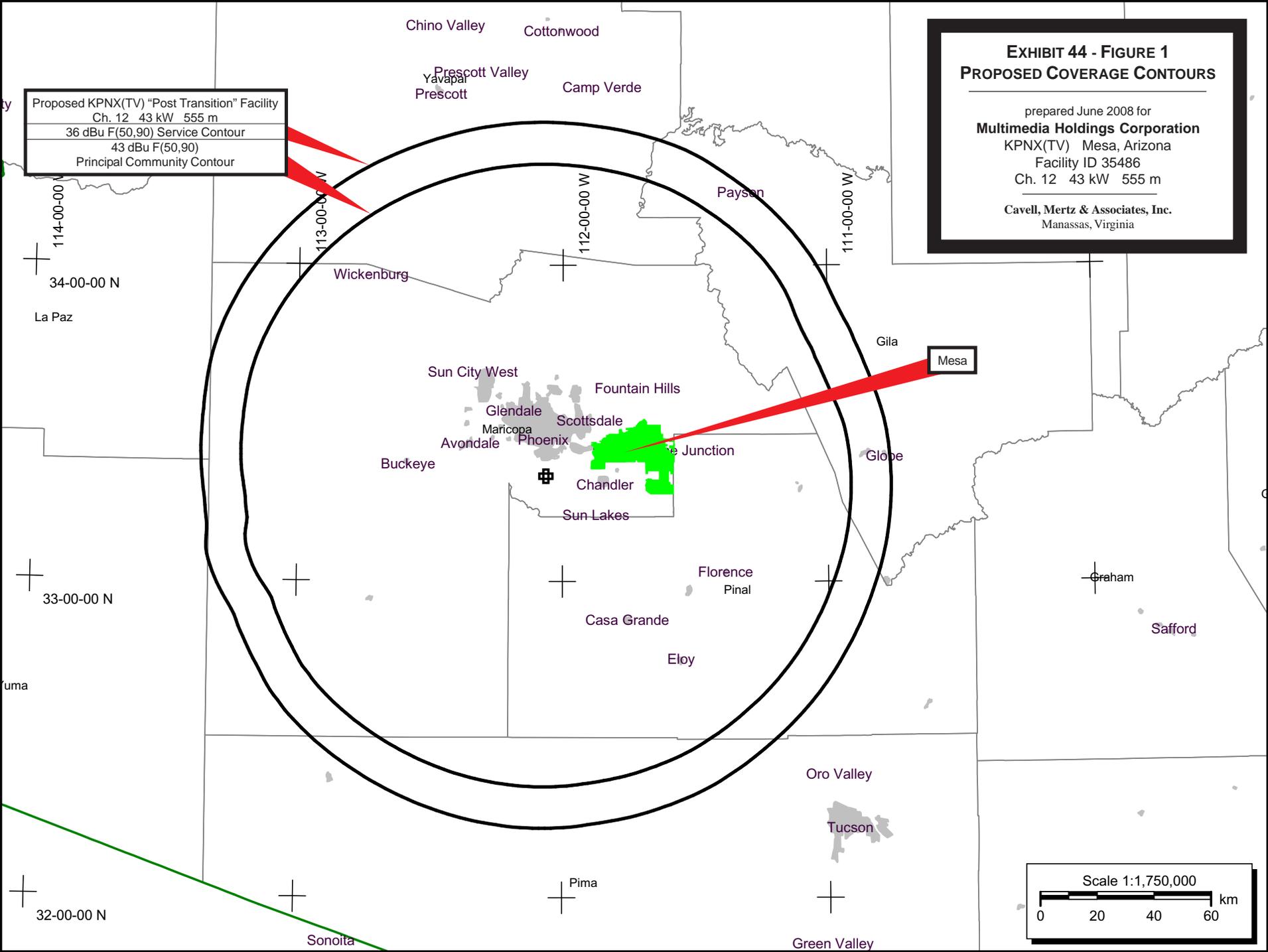
³ See *Report and Order, Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, MB Docket No. 07-91, FCC 07-228, Released December 31, 2007.

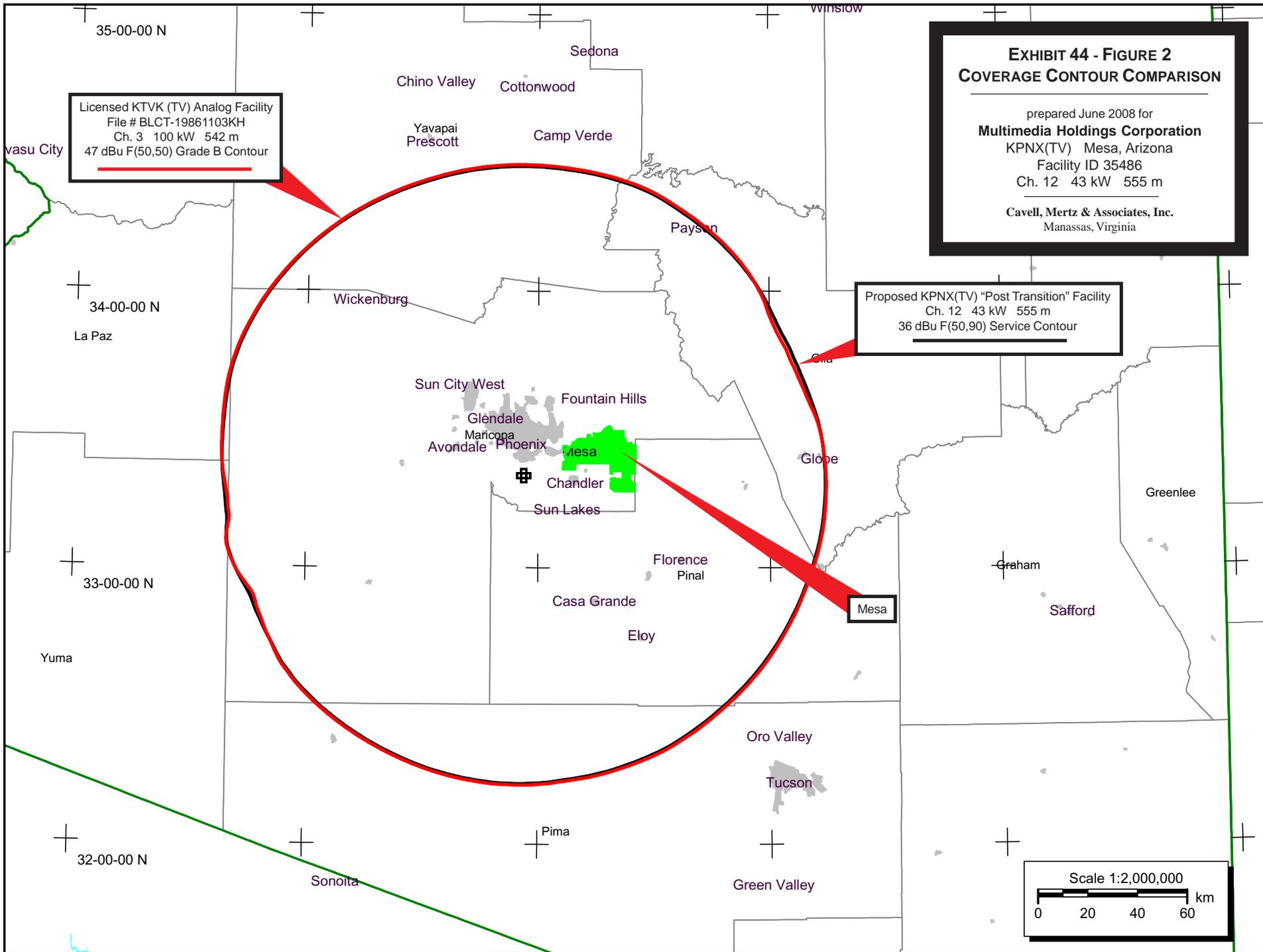
Proposed KPNX(TV) "Post Transition" Facility
Ch. 12 43 kW 555 m
36 dBu F(50,90) Service Contour
43 dBu F(50,90)
Principal Community Contour

EXHIBIT 44 - FIGURE 1
PROPOSED COVERAGE CONTOURS

prepared June 2008 for
Multimedia Holdings Corporation
 KPNX(TV) Mesa, Arizona
 Facility ID 35486
 Ch. 12 43 kW 555 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia





Licensed KTVK (TV) Analog Facility
 File # BLCT-19861103KH
 Ch. 3 100 kW 542 m
 47 dBu F(50,50) Grade B Contour

EXHIBIT 44 - FIGURE 2
COVERAGE CONTOUR COMPARISON

prepared June 2008 for
Multimedia Holdings Corporation
 KPNX(TV) Mesa, Arizona
 Facility ID 35486
 Ch. 12 43 kW 555 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Proposed KPNX(TV) "Post Transition" Facility
 Ch. 12 43 kW 555 m
 36 dBu F(50,90) Service Contour

Mesa

Scale 1:2,000,000
 0 20 40 60 km

Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS

prepared for

Multimedia Holdings Corporation

KPNX(TV) Mesa, AZ

Facility Id: 35486

Ch. 12 43 kW 555 m

<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 7th R&O facility (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference Population</u>	<u>Percentage</u>
12	KOBG-TV	Silver City, NM	BPCDT-20080502ABH	58,000			---	No Interference	---
12	KOBG-TV	Silver City, NM	Reference	58,000	58,246	0	37	37	0.064 %
13	KFPH-TV	Flagstaff, AZ	BPCDT-20080312AEW	203,000			---	No Interference	---
13	KFPH-TV	Flagstaff, AZ	Reference	203,000			---	No Interference	---

Exhibit 46 – Statement B
ENVIRONMENTAL CONSIDERATIONS

prepared for

Multimedia Holdings Corporation

KPNX(TV) Mesa, Arizona

Facility ID: 35486

Ch. 12 43 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 proposed KPNX(TV) antenna that will be employed for the proposed post-transition operation will have a center of radiation 104 meters above ground level. An ERP of 43 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

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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 5.52 μW/cm² at two meters above ground level near antenna support structure, or 2.8 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.