

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**Multimedia Holdings Corporation**  
K06AE Prescott, AZ  
Facility ID 35274  
Ch. 6 (Digital Flash-Cut) 0.3 kW

*Multimedia Holdings Corporation* (“*Multimedia*”) is the licensee of television translator station K06AE, Channel 6, Prescott, Arizona, Facility ID 35274 (BLTTV-3781). *Multimedia* proposes herein to “flash-cut” to digital operation. A change in site location is specified, and a new transmitting antenna system is proposed.

**Nature of the Proposal**

The proposed translator will rebroadcast *Multimedia*’s station KNAZ-DT in Flagstaff. The input channel specified in the Tech Box reflects the channel proposed in *Multimedia*’s petition for rulemaking to substitute channel 22 for channel 2 in the DTV Table of Allotments for KNAZ-DT (MB Docket No. 08-110).

The proposed antenna system for the digital K06AE is a directional antenna (Scala model CL-46HR, FCC Antenna ID 20784), which will be side-mounted on an existing antenna structure that is not registered. The structure is less than 200 feet tall and passes the FCC’s TOWAIR program; therefore FAA notification and registration with the Commission are not required. The ground elevation for the transmitting site is based on the U.S.G.S 7.5 second topographic map for the region.

The proposed directional antenna, a Scala model CL-46HR, is a standard, off-the-shelf pattern. The attached **Exhibit 11 – Figure 1** supplies a plot of the K06AE directional pattern, properly oriented to True North. **Exhibit 11 – Figure 2** supplies a plot of the vertical (elevation) plane pattern.

The proposed digital facility will operate on Channel 6 using a “simple” out of channel emission mask with a directional antenna having a maximum effective radiated power of 0.3 kW at a

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new transmitting site location. **Exhibit 11 - Figure 3** depicts the coverage contours of the licensed (analog 62 dBμ) and the proposed (digital 43 dBμ) facilities. As demonstrated on the provided map, the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

### **Allocation Considerations**

The instant proposal complies with the Commission's interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69")<sup>1</sup>. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The results, summarized in **Exhibit 11 - Table I**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full service and Class A stations, and 2.0 percent to secondary stations). Accordingly, the instant proposal complies with §74.793 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

### **International Coordination**

The proposed transmitter site is located 314.2 km from the U.S. - Mexican border, which is within the 400 km coordination distance specified in the 1962 United States – Mexico VHF Television Agreement. Neither the 1962 agreement, nor any subsequent amendment discusses digital low power proposals within the coordination distance. However, the proposed facility does comply with the co-channel and other spacing requirements found in Tables B and C of the 1998

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<sup>1</sup> The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

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MOU<sup>2</sup>. Thus, it is believed that the proposal complies with all international agreements. *Multimedia* respectfully requests coordination with Mexico as may be necessary.

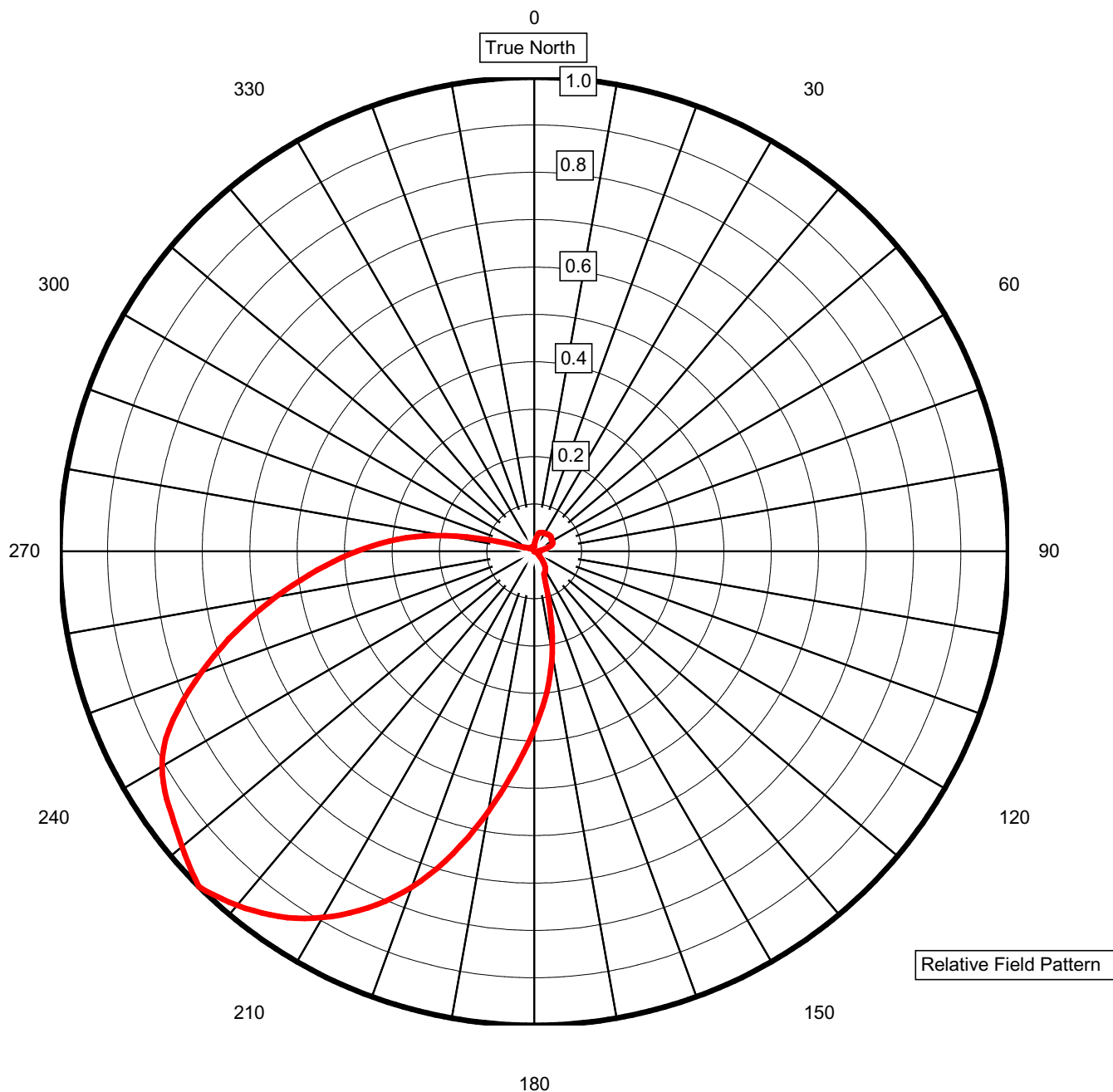
**Other Allocation Considerations**

The nearest FCC monitoring station is at Douglas, AZ, at a distance of 423 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 areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no AM broadcast stations located within 3.2 km (2 miles) of the proposed site, according to information extracted from 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.

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<sup>2</sup> "Memorandum Of Understanding Between The Federal Communications Commission Of The United States Of America And The Secretaria De Comunicaciones Y Transportes Of The United Mexican States Related To The Use Of The 54-72 MHz, 76-88 MHz, 174-216 MHz And 470-806 MHz Bands For The Digital Television Broadcasting Service Along The Common Border", July 22, 1998.

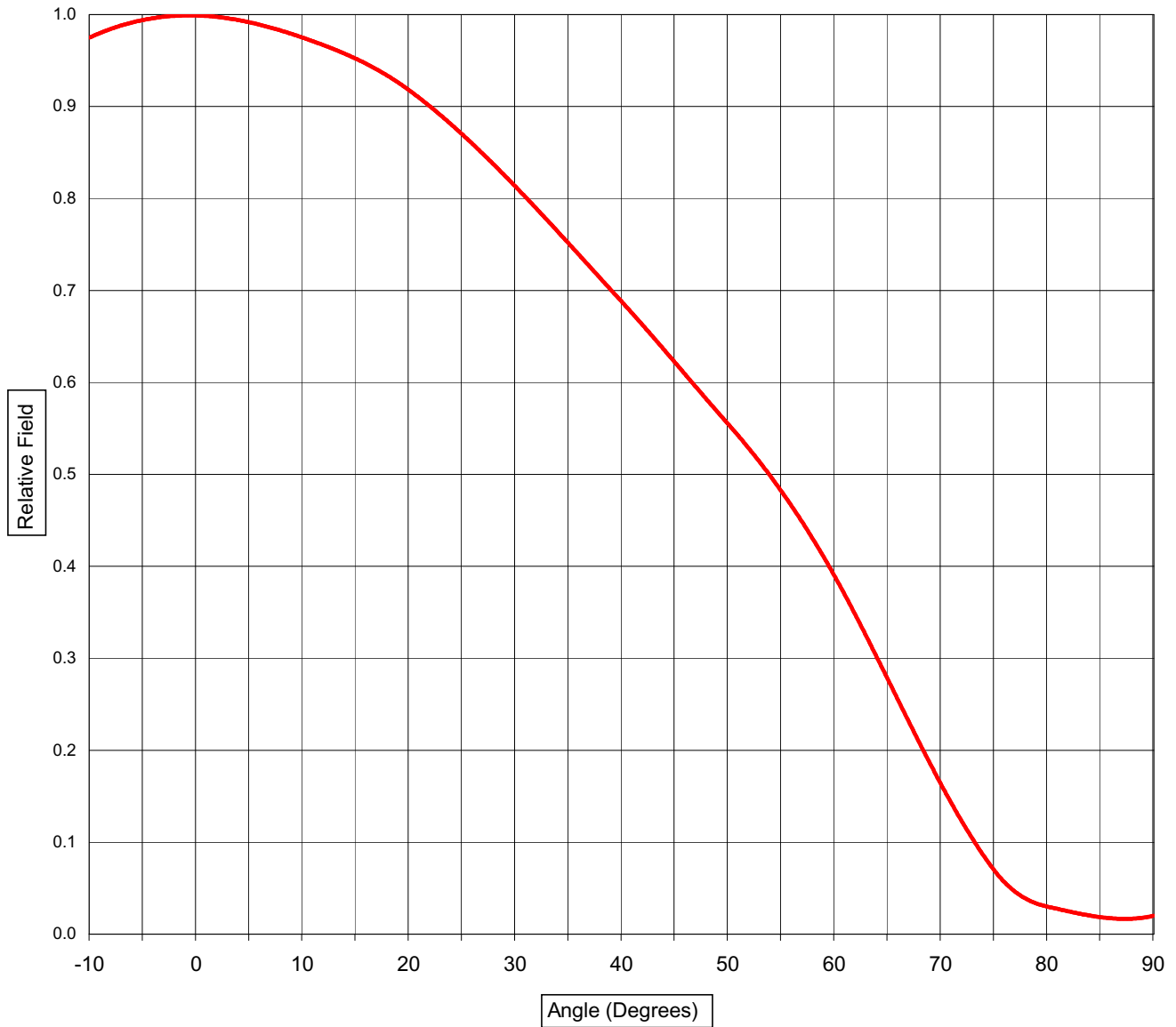


**EXHIBIT 11 - FIGURE 1**  
**ANTENNA HORIZONTAL PLANE RADIATION PATTERN**

prepared June 2009 for  
**Multimedia Holdings Corporation**  
K06AE Prescott, Arizona  
Ch. 6 0.3 kW

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

Relative Field Pattern



**EXHIBIT 11 - FIGURE 2**  
**VERTICAL PLANE (ELEVATION)**  
**RADIATION PATTERN**

prepared June 2009 for  
**Multimedia Holdings Corporation**  
K06AE Prescott, Arizona  
Ch. 6 0.3 kW

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

**EXHIBIT 11 - FIGURE 3  
COVERAGE CONTOUR COMPARISON**

prepared June 2009 for  
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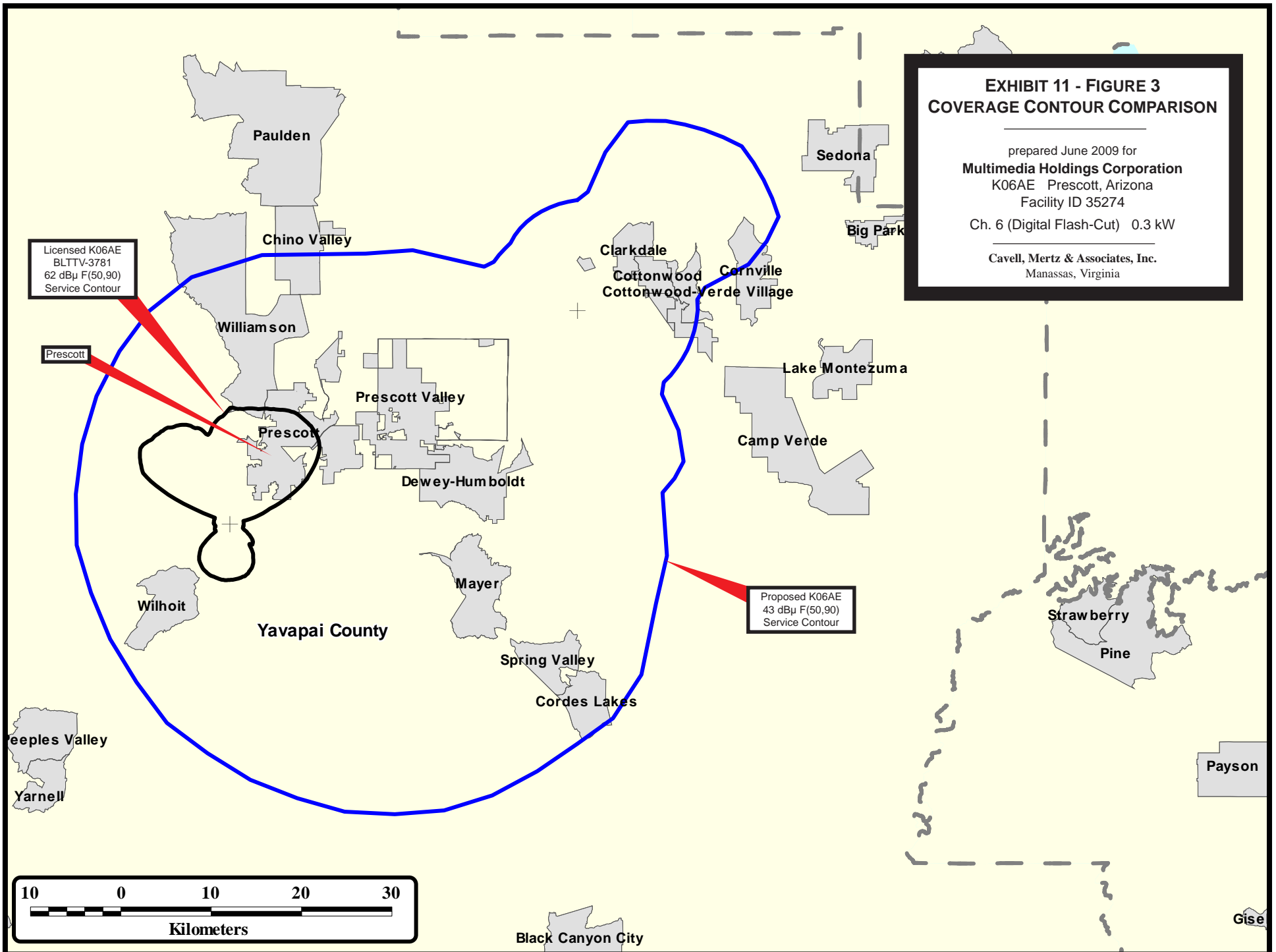


Exhibit 11 - Table I  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for  
**Multimedia Holdings Corporation**  
K06AE Prescott, AZ  
Facility ID 35274  
Ch. 6 (Digital Flash-Cut) 0.3 kW

						---Population (1990 Census)---	
<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>File Number</u>	<u>Baseline</u>	<u>New Interference</u>
5	K05MK	Flagstaff, AZ	63.1	CP	BNPTVL-20000816AAO	---	none
5	KPHO-TV	Phoenix, AZ	152.1	LIC	BLCT-1049	2,261,263	1,547 / 0.07%
6	KTVW-CA	Flagstaff/Doney Park, AZ	76.5	LIC	BLTVL-19930914IG	---	none
6	KNJO-LP	Holbrook, AZ	177.0	LIC	BLTVL-20051017AAF	---	none
6	KMOH-TV	Kingman, AZ	208.3	LIC	BLCT-20020627AAL	112,547	40 / 0.04%
6	K25DM	Phoenix, AZ	123.1	CP	BDISTVL-20071121ADN	883,349	0 / 0.00%
6	KTVP-LD	Phoenix, AZ	123.0	CP	BDCCDTL-20061005ABF	1,709,511	0 / 0.00%
6	KUAT-TV	Tucson, AZ	285.4	LIC	BLET-20030103AAW	---	none
6	KVFA-LP	Yuma, AZ	319.9	APP	BSTA-20071115ABI	---	none
6	KVFA-LP	Yuma, AZ	320.9	LIC	BLTVL-20071009AAS	---	none
6	K06MB	Indio, CA	390.3	LIC	BLTVA-20050315AGG	---	none
6	K06IQ	Newberry Springs, CA	416.8	LIC	BLTTV-5094	---	none
6	K06CU	Grants, NM	387.2	APP	BDISDTV-20081022ABF	---	none
6	K06CU	Grants, Etc., NM	387.1	LIC	BLTTV-525	---	none
6	KOBG-TV	Silver City, NM	412.3	LIC	BLCT-20030226ABU	---	none
6	K06IS	Tohatchi, NM	331.7	APP	BSTA-20060818AEM	---	none
6	K06IS	Tohatchi, NM	331.7	LIC	BLTTV-20061228AAN	---	none
6	KBNY	Caliente, NV	403.7	ADD	BPRM-20000717ABW	---	none
6	DK06KE	Indian Springs, NV	380.9	LIC	BLTTV-19810325JE	---	none
6	KVPX-LP	Las Vegas, NV	299.6	CP	BDCCDTL-20061005ABD	---	none
6	DK06IT	Mercury, Etc., NV	409.3	LIC	BLTTV-4785	---	none
6	K06DM	Panaca, NV	372.1	LIC	BLTTV-19960826JA	---	none
6	K06MM	Bluff, UT	366.7	LIC	BLTTV-19940114JK	---	none
6	K06OB	Cane Beds, Az/Hilldal, UT	290.4	LIC	BLTTV-20060213ABO	---	none
6	K06JA	Cedar Canyon, UT	328.9	CP	BDFCDTV-20081217AGW	---	none

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<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>File Number</u>	<u>---Population (1990 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
6	K06JA	Cedar Canyon, UT	329	LIC	BLTTV-4992	---	none
6	K06FL	Fish Lake Resort, UT	426.8	LIC	BLTTV-4131	---	none
6	K06KO	Kanarraville, Etc., UT	324.8	LIC	BLTTV-20061219ABF	---	none
6	K06IG	Koosharem, UT	420.5	LIC	BLTTV-4279	---	none
6	K06BS	Loa, Etc., UT	412.2	LIC	BLTTV-3916	---	none
6	K06FM	Long Valley Junction, UT	313.9	LIC	BLTTV-4596	---	none
6	K06NK	Mexican Hat, UT	339.7	LIC	BLTTV-20050829ADA	---	none
6	K06NR	Navajo Mtn.Sch.,Etc., UT	285.2	LIC	BLTTV-20060222ABF	---	none
6	K06NM	Oljeto, UT	305.9	LIC	BLTTV-20050829ACZ	---	none
6	K67HK	St. George, UT	293.4	CP	BDISTVL-20081218ABD	---	none