

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 40 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* amended its pending its pending post-transition application to specify a maximized post-transition operation for KPNX(TV). However, based on information provided by Commission Staff, coordination of the maximized KPNX facility with Mexican officials may not be completed until after February 17, 2009. Therefore, the facility proposed herein is intended to provide digital service until coordination of the maximization facility with Mexican authorities has been completed. It is our understanding that that Mexican coordination for the facility proposed herein has already been completed. 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 3,245,847 persons, which is 100.3 percent of the 3,236,000 persons that are predicted to receive interference free service from the Appendix B facility².

Exhibit 44-Figure 2 provides a comparison of the proposed digital facilities service contour along with that of the licensed KPNX analog facility. As shown therein, the coverage footprint for the proposed facility covers a larger area than that of the analog KPNX operation. The proposed facility is predicted to provide interference free service to 3,245,847 persons, which is 100.6 percent

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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of the 3,227,739 persons that are predicted to receive interference free service from the licensed KPNX analog facility.

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 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 40 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 largest station within their market". In this case, the largest service area is that of the licensed analog facility for KTVK(TV)⁴ (Ch. 3, Phoenix, AZ, 0.08 km distant, 100 kW ERP / 542 meters HAAT). The area within the proposed KPNX 36 dBμ service contour is 46,728.9 square kilometers, which does not exceed the 47,532.1 square kilometers of area within the licensed KTVK(TV) 47 dBμ Grade B contour. The attached **Exhibit 44 - Figure 3** provides a map which depicts the coverage contours for these facilities. Thus, the ERP/HAAT combination 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. We understand that coordination at the ERP/HAAT combination proposed herein has already been successfully coordinated with Mexican officials. 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

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.

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§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.

⁴ In Section 73.622(f)(5) the term "largest station" refers to just that. Until analog television is no longer authorized, it is believed that analog facilities as well as digital facilities are appropriate for determining the largest station in the market.

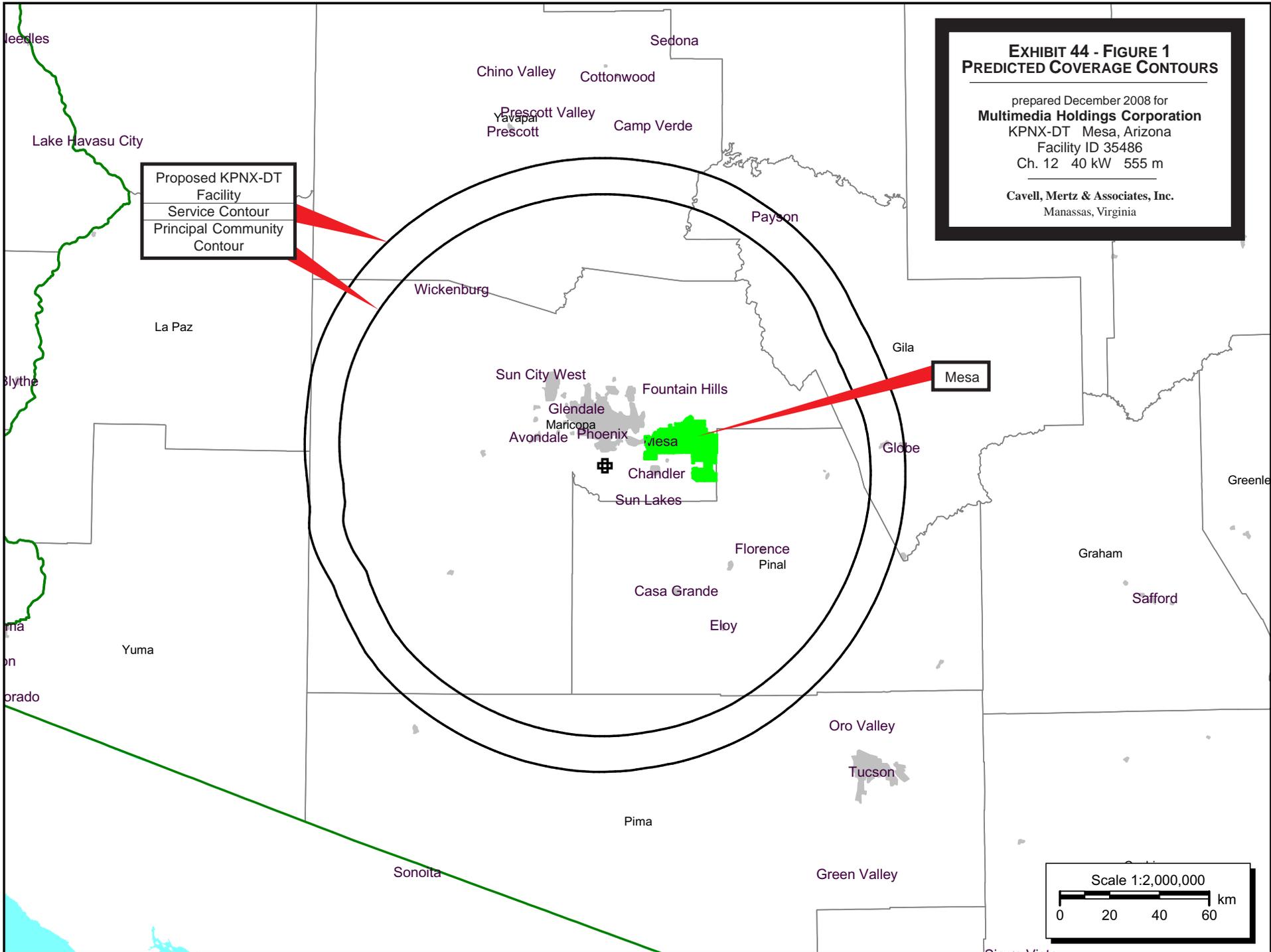


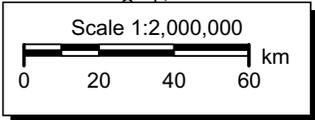
EXHIBIT 44 - FIGURE 1
PREDICTED COVERAGE CONTOURS

prepared December 2008 for
Multimedia Holdings Corporation
 KPNX-DT Mesa, Arizona
 Facility ID 35486
 Ch. 12 40 kW 555 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Proposed KPNX-DT
 Facility
 Service Contour
 Principal Community
 Contour

Mesa



**EXHIBIT 44 - FIGURE 2
COVERAGE CONTOUR COMPARISON**

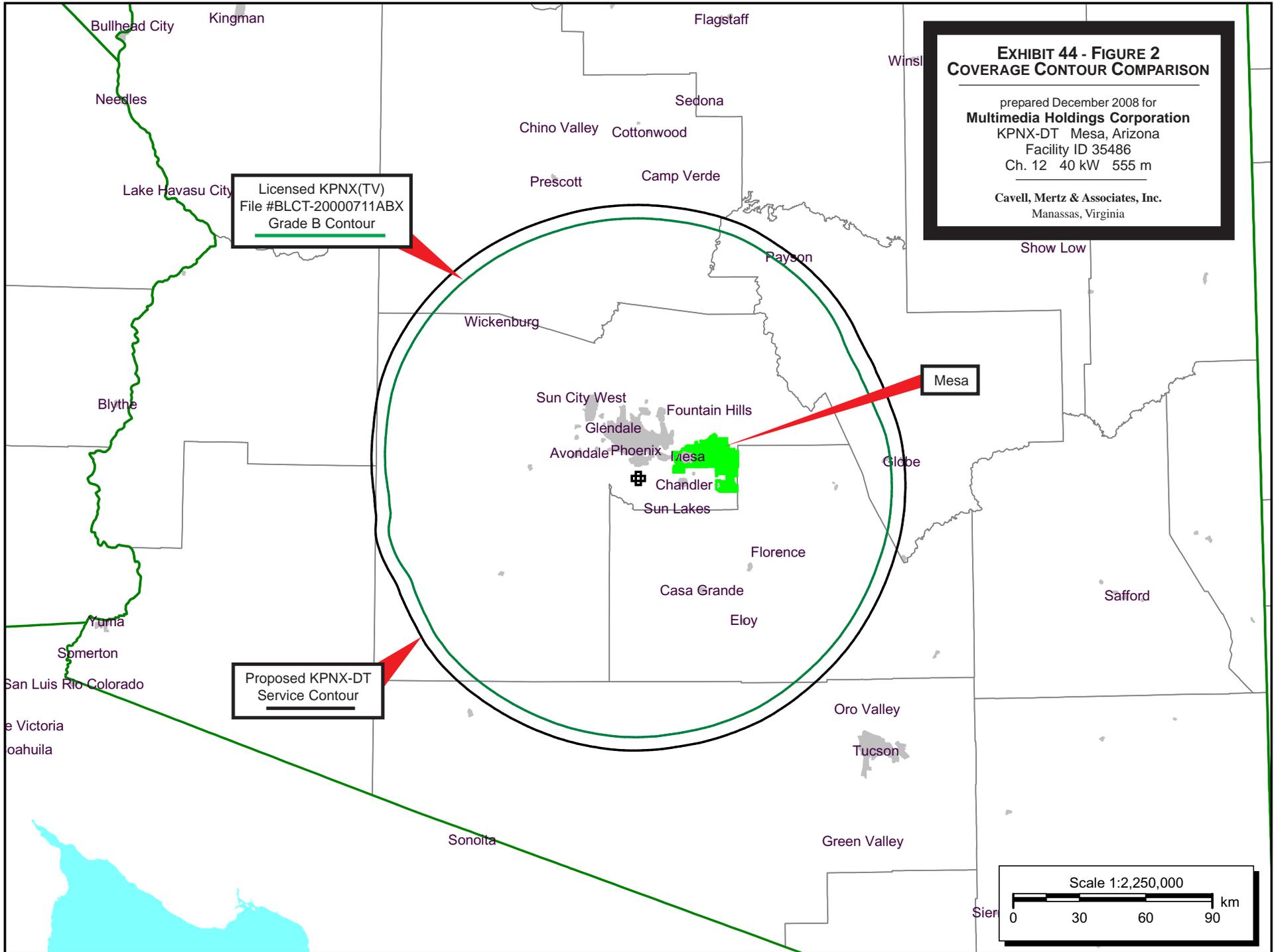
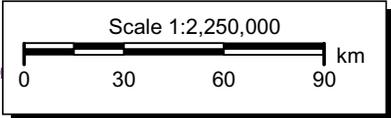
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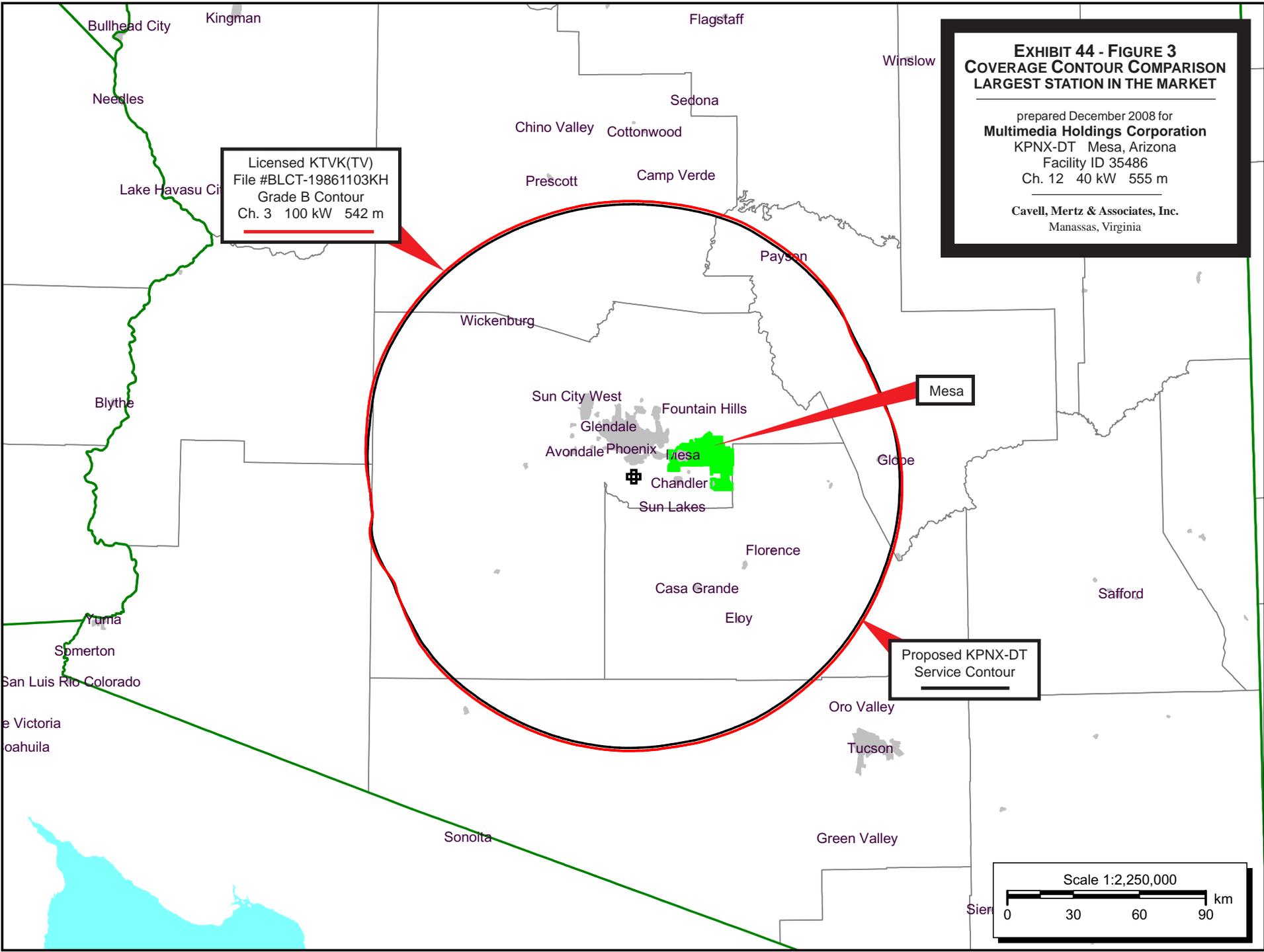
Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Licensed KPNX(TV)
File #BLCT-20000711ABX
Grade B Contour

Proposed KPNX-DT
Service Contour

Mesa





Licensed KTVK(TV)
 File #BLCT-19861103KH
 Grade B Contour
 Ch. 3 100 kW 542 m

EXHIBIT 44 - FIGURE 3
COVERAGE CONTOUR COMPARISON
LARGEST STATION IN THE MARKET

prepared December 2008 for
Multimedia Holdings Corporation
 KPNX-DT Mesa, Arizona
 Facility ID 35486
 Ch. 12 40 kW 555 m

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Mesa

Proposed KPNX-DT
 Service Contour

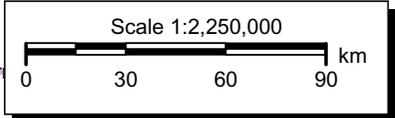


Exhibit 44 - Table I
INTERFERENCE STUDY RESULTS

prepared for

Multimedia Holdings Corporation

KPNX(TV) Mesa, AZ

Facility Id: 35486

Ch. 12 40 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 without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
								<u>Population</u>	<u>Percentage</u>
11	KDTP(TV)	Holbrook, AZ	BMPEdT-20080616ACH	16,000	289,823	11,439	11,439	0	0.000 %
12	KOBG-TV	Silver City, NM	BPCDT-20080502ABH	58,000			---	No Interference	---
12	KOBG-TV	Silver City, NM	Reference	58,000	58,246	0	28	28	0.048 %
12	KOBG-TV	Silver City, NM	BPCDT-20080502ABH	58,000			---	No Interference	---
13	KFPH-TV	Flagstaff, AZ	Reference	203,000			---	No Interference	---
13	KFPH-TV	Flagstaff, AZ	BMPCDT-20080618AND	203,000			---	No Interference	---