

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of

Amendment of Section 73.622(i) of
the Commission's Rules,
DTV Table of Allotments
(Flagstaff, Arizona)

MB Docket No. 08-110

RM No. 11453

FILED/ACCEPTED
JUN - 7 2008
Federal Communications Commission
Office of the Secretary

To: Office of the Secretary, Federal Communications Commission
Attn: Chief, Media Bureau, Video Division

THIRD SUPPLEMENT TO PETITION FOR RULEMAKING

Multimedia Holdings Corporation ("MHC"), the licensee of KNAZ-DT, Flagstaff, Arizona (Fac. ID No. 24749) ("KNAZ" or the "Station"), by its attorneys, hereby submits this further supplement (the "Third Supplement") to its June 20, 2008 Petition for Rulemaking in the above-referenced proceeding (the "Petition")¹ and its September 22, 2008 Supplement (the "Supplement") and October 29, 2008 Further Supplement thereto (the "Further Supplement," and collectively, the "Supplements").² The Petition asks the Commission to modify the DTV Table of Allotments contained in Section 73.622(i) of the Commission's rules (the "DTV Table")³ to allow KNAZ to continue operating its currently-licensed, 283 kilowatt channel 22 DTV facility after the

¹ *In the Matter of Amendment of Section 73.622(i) of the Commission's Rules, DTV Table of Allotments (Flagstaff, Arizona), RM-11453, Petition for Rulemaking (June 20, 2008).*

² *In the Matter of Amendment of Section 73.622(i) of the Commission's Rules, DTV Table of Allotments (Flagstaff, Arizona), RM-11453, Supplement to Petition for Rulemaking (September 22, 2008) and Further Supplement to Petition for Rulemaking (October 29, 2008).*

³ See 47 C.F.R. § 73.622(i).

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DTV transition.⁴ This Third Supplement, including the attached coverage maps prepared by Cavell, Mertz & Associates, Inc.,⁵ responds to specific concerns of FCC staff concerning potential loss of over-the-air service in Prescott Valley and Dewey-Humboldt.

In the Petition and Supplements, MHC has provided an analysis of the precise location of populated areas, showing, on a granular level, the location of viewers throughout the Flagstaff market, specifically those located in areas that (a) currently receive over-the-air analog service, and (b) will continue to receive over-the-air digital service from the facility proposed in the Petition. The Further Supplement provided detailed information showing that with the exception of a couple of discrete areas, the population predicted to lose service is broadly dispersed and not concentrated in any specific area.⁶ The Further Supplement also showed in detail that the vast majority of the predicted service loss would occur in Yavapai County, where 62,565 out of the 80,334 persons predicted to lose over-the-air service (78 percent of the loss) are located.⁷

The key population centers in Yavapai County where the digital signal is not predicted to provide service are Prescott, Prescott Valley, and Dewey-Humboldt.⁸ This is due to the rugged terrain southwest of Flagstaff, which has historically limited the KNAZ analog signal as well.⁹ To overcome the terrain obstructions, over-the-air service in

⁴ See generally Petition, Supplement. See also FCC File No. BLCDDT-20070119AAN.

⁵ See Exhibit A.

⁶ See Further Supplement at Figure 1.

⁷ See *Id.* at Figure 5 – Table 1.

⁸ See *Id.* at Figures 1 and 2.

⁹ See Supplement at Figures 4 and 6.

Prescott has been provided for at least 30 years by television translator Station K06AE.¹⁰ The translator serves 23,389 of the persons who are not predicted to receive service from the proposed Channel 22 facility.¹¹ This service would continue after the transition. However, FCC staff has expressed concern about other persons located in Prescott Valley and Dewey-Humboldt who will not be served by the proposed digital facility and has asked MHC to consider possible ways of remedying that problem.¹²

MHC has evaluated several options that could provide over-the-air digital service in Prescott Valley and Dewey-Humboldt and has identified one that achieves that objective. Specifically, service can be provided to all three communities – Prescott, Prescott Valley and Dewey-Humboldt – by relocating K06AE from its current site on Mt. Francis, southwest of Prescott, to a tower on Mingus Mountain, northeast of Prescott, Prescott Valley and Dewey-Humboldt.¹³ The translator will be modified to operate with a different directional antenna and a digital transmitter. The proposed contour will encompass 100 percent of the licensed K06AE contour. In total the translator will provide an over-the-air interference-free signal to 115,451 persons in Prescott, Prescott

¹⁰ K06AE in Prescott rebroadcasts the signal of co-owned station KPNX, Mesa (Phoenix), Arizona, which carries the same programming as KNAZ, Flagstaff.

¹¹ *See Id.* at Figure 2 and Figure 5 - Table 1.

¹² The staff initially expressed concern about an estimated 23,000 persons in Prescott Valley and 7,800 persons in Chino Valley. Further analysis of the FCC's map of predicted loss areas (*see* Exhibit B hereto) indicates that the 7,800 persons are actually located in Dewey-Humboldt, not Chino Valley. MHC has shown in its previous submissions that Chino Valley will be well-served by the proposed Channel 22 facility. *See* Supplement at Figure 6, Further Supplement at Figures 1 and 2. Therefore, MHC's efforts have been directed at providing enhanced service in Prescott Valley and Dewey-Humboldt.

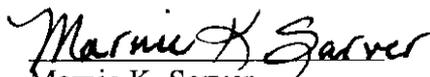
¹³ *See* Exhibit A, Figure 1. White area within the contour represents areas of predicted interference-free service. Blue, red and green areas will not receive service, due to digital interference, analog interference, and terrain obstructions, respectively. Notably, there are virtually no population centroids located in the unserved areas.

Valley, Dewey-Humboldt and the surrounding area, leaving virtually no unserved population in the southwestern quadrant of the KNAZ service area.¹⁴ An application to modify the license of K06AE is being prepared and will be filed within the next few days.

In view of the additional service that the modified Prescott translator will provide, and the record MHC has already built in this proceeding, MHC respectfully requests that the Commission modify the DTV Table to allow KNAZ to operate post-transition on channel 22 with its currently-licensed, 283 kilowatt DTV facility.

Respectfully submitted,

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Dated: June 1, 2009

¹⁴ *Id.* at Figure 2.

**EXHIBIT A – CONTOUR MAPS PREPARED BY
CAVELL, MERTZ & ASSOCIATES, INC.**

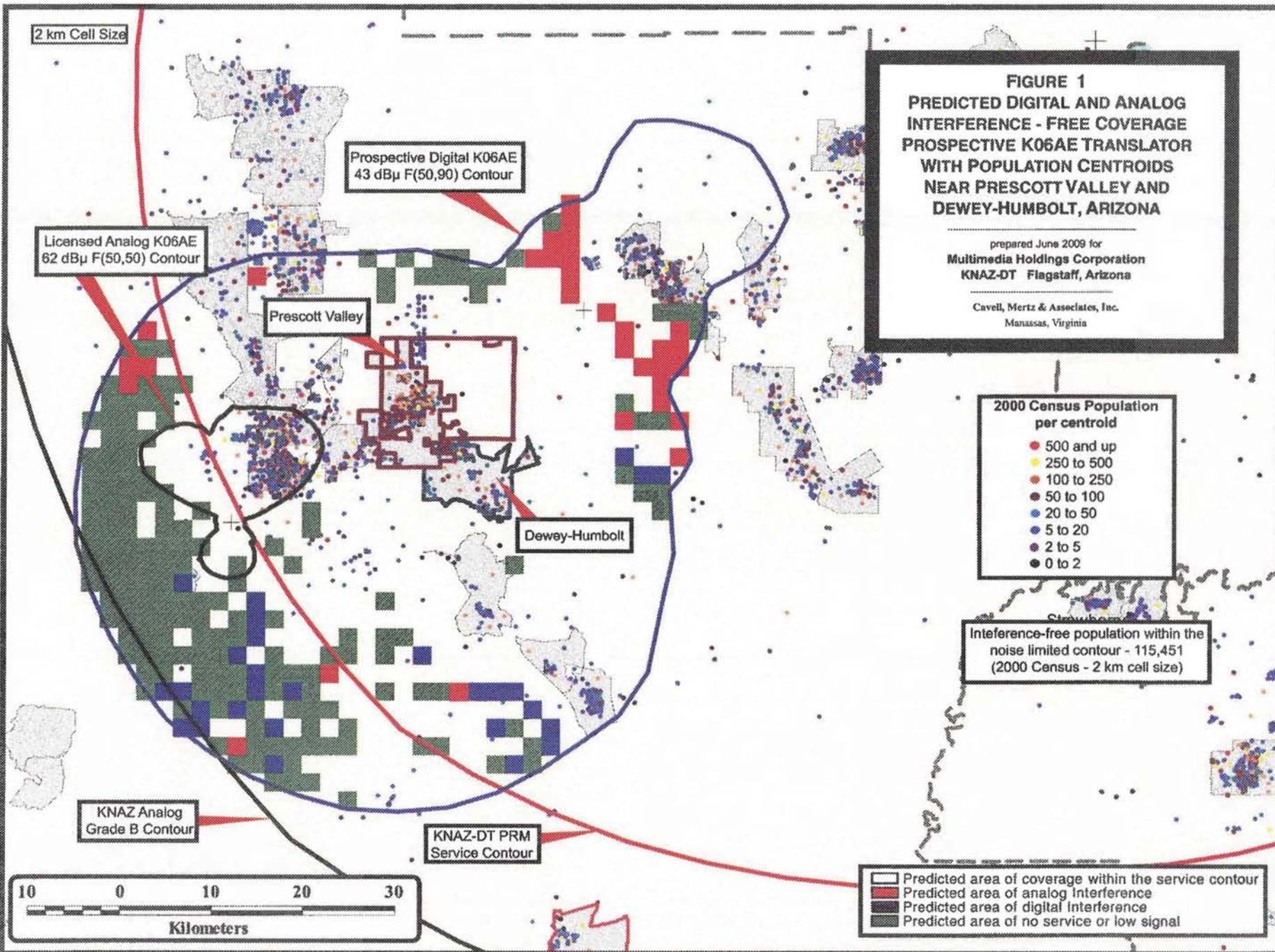


FIGURE 1
PREDICTED DIGITAL AND ANALOG INTERFERENCE - FREE COVERAGE PROSPECTIVE K06AE TRANSLATOR WITH POPULATION CENTROIDS NEAR PRESCOTT VALLEY AND DEWEY-HUMBOLT, ARIZONA

prepared June 2009 for
Multimedia Holdings Corporation
KNAZ-DT Flagstaff, Arizona

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

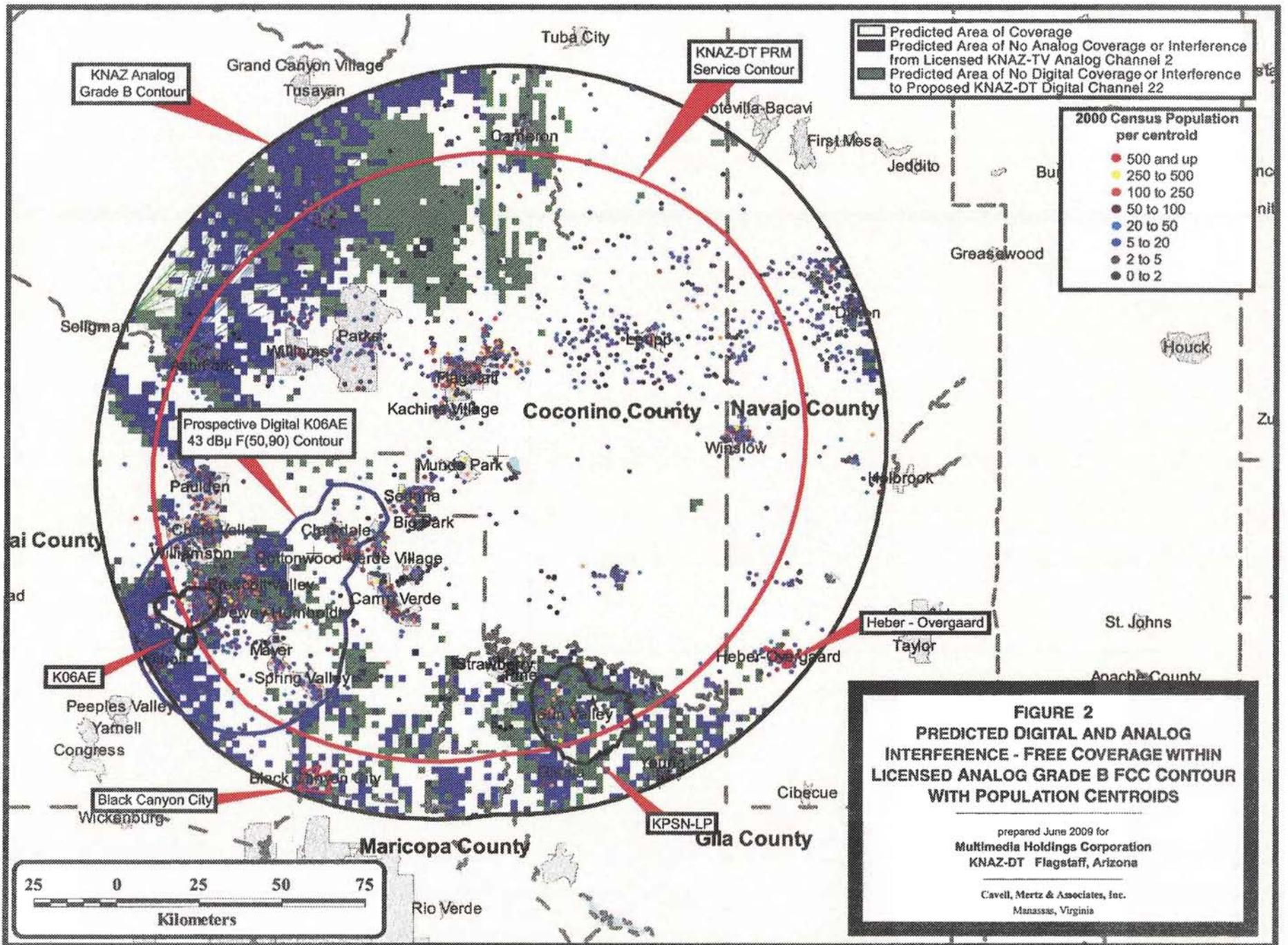


EXHIBIT B – FCC STUDY OF PREDICTED LOSS AREAS

