

Exhibit 9
**NTSC TV STATION, DIGITAL TV STATION AND
DTV TABLE OF ALLOTMENTS PROTECTION**
prepared for
Guenter Marksteiner
WZDT-LP Naples, Florida
Ch. 39 24.7 kW

This engineering statement has been prepared on behalf of *Guenter Marksteiner*, licensee of Low Power Television (LPTV) station WZDT-LP, Naples, Florida. The instant statement is provided to support an application for Class A license (FCC Form 302-CA).

This statement responds to “Certifications, Part A” on FCC Form 302-CA regarding interference protection to full service analog and digital television stations. A review of the allocation situation for the licensed WZDT-LP operation on Channel 39 showed that there is contour overlap between the licensed WZDT-LP and several facilities that would be prohibited under §§74.705 and 74.706 of the Commission’s Rules.

However, §§73.6011 and 73.6013 provide for protection of full service analog stations and digital stations and allotments by Class A television facilities based on use of the methodology specified in §74.705(e) and §73.623(c)(2) through (c)(4), which reference the Commission’s Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 (“OET-69”).¹

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard terrain profile step size of 1 km and cell size of 2 km were used. The Longley-Rice computer program input data, following the guidelines established under OET-69, includes a location variability of 50%, a time availability of 10%, a situation variability of 50%, horizontal polarization, 0.005 S/m conductivity, a climate constant of 15, an assumption of a continental temperate climate zone, and a receive antenna height of 10 meters. The service area for each DTV facility under study is that area predicted to receive signal levels of at least 41 dBμ using the Longley-Rice methodology, and within the DTV F(50,90) service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 50 kW or 1,000 kW, the Grade B contour of the associated analog station (as authorized April 3, 1997) is used to determine the extent of the DTV station’s service area. The F(50,90) DTV service contour level is established by the formula $41 - 20\log[615/(\text{channel mid-frequency})]$ dBμ. The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 64 dBμ using the Longley-Rice methodology, and within the NTSC F(50,50) service contour distance as determined per §73.684. The F(50,50) NTSC service contour level is established by the formula $64 - 20\log[615/(\text{channel mid-frequency})]$ dBμ. Comparisons of various results of this computer program to the Commission’s implementation of OET-69 show good correlation.

Exhibit 9
**NTSC TV STATION, DIGITAL TV STATION AND
DTV TABLE OF ALLOTMENTS PROTECTION**
(page 2 of 2)

Accordingly, a detailed study per OET-69 was conducted to evaluate the change in interference to pertinent full service NTSC and DTV stations and assignments that may be attributed to the WZDT-LP facility. All stations considered in this study are listed in **Exhibit 9 - Table I**. As shown therein, WZDT-LP would not cause any new interference to any full service NTSC or DTV facility. Thus, WZDT-LP is believed to be in compliance with Commission Rules regarding protection of full service NTSC and DTV stations and allotments by Class A television stations.

Exhibit 9 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
Guenter Marksteiner
 WZDT-LP Naples, Florida
 Facility ID 25539
 Ch. 39+ 24.7 kW

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Service Population</u> (2)	<i>---- Unique Interference ---- from WZDT-LP</i>	
					<u>Population</u> (3)	<u>Percentage</u> (4)
WZBL(TV) (LIC)	Miami, FL 39z NTSC	161.3	3,731,985	3,732,571	0	0.00
WFTV-DT (Ref)	Orlando, FL 39 DTV	272.8	2,482,000	2,467,521	0	0.00
WFTV-DT (LIC)	Orlando, FL 39 DTV	272.8	2,482,000	2,469,481	0	0.00
WTVK(TV) (LIC)	Naples, FL 46z NTSC	30.6	549,970	514,696	0	0.00
WTVK(TV) (CP)	Naples, FL 46z NTSC	64.7	855,993	858,724	0	0.00

Notes:

- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
For NTSC stations, total population within noise-limited contour
- (2) Interference-free service population per OET-69 before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal
- (4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "Additional Application Processing Guidelines for Digital Television"