

**ENGINEERING STATEMENT**  
**L4 MEDIA GROUP, LLC**  
**MINOR MODIFICATION OF CONSTRUCTION PERMIT 0000025143**  
**WZXZ-CD, ORLANDO, ETC., FL**  
**PROPOSED: CH 20, 15 KW-DIRECTIONAL, 81.4 m AMSL**

This statement supports an application by L4 Media Group, LLC, licensee of WZXZ-CD (“WZXZ”), to make a minor modification to construction permit file number 0000025143 to construct its assigned post-auction television repack facility.

Applicant proposes to operate on the assigned repack channel of 20 with an Effective Radiated Power of 15 kW at an antenna height of 81.4 m AMSL from an alternate location that is 14.7 km from the current location. Applicant also proposes the change the antenna from a Dielectric, TUA-C3 to a Dielectric, TLP-8B. The proposed contour from the alternate location well encompasses the entire contour granted for the repack facility. Considering the distance of the relocation and the total contour overlap, this relocation well satisfies the rules for moving low-power television stations.

An interference analysis was performed pursuant to the parameters used by the Commission for application interference processing. The results of the analysis showed that the proposed operation for WZXZ is not predicted to cause interference in excess of that allowed by the rules except as noted below. The analysis was performed using the methodology stated in OET-69 using the same software (TVStudy v2.2.3) utilized by the Commission and, therefore, should yield similar results.

**Translator and LPTV Protection Considerations:**

WZXZ currently operates on channel 36 and was assigned channel 20 by the FCC’s repack software. Channel 20 is currently used by WFTV as a digital replacement serving Orlando, FL. Referring to the attached map, WFTV well encroaches into the facility of the current construction permit granted to WZXZ, which closely replicates its baseline repack assignment parameters. WFTV will cause significant harmful interference into both the granted and proposed modifications to WZXZ’s construction permit if it were to remain on-the-air after the repack transition. Likewise, WZXZ is unable to protect WFTV as authorized. WFTV is predicted to cause more than 15% interference into the WZXZ baseline assignment and, therefore, should be considered displaced and the resulting interference caused by WZXZ into WFTV ignored in the processing of this application.



Meintel, Sgrignoli, & Wallace