

**ENGINEERING STATEMENT
L4 MEDIA GROUP, LLC
MINOR MODIFICATION OF LICENSE FILE NUMBER 0000013277
WBXG-LD, GAINESVILLE, FL
PROPOSED: CH 34, 15 KW, NON-DIRECTIONAL, 40.8 m AMSL**

This statement supports an application by L4 Media Group, LLC, licensee of WBXG-LD, to make a minor change in its licensed facility 0000013277.

Applicant currently operates on UHF channel 33. Even though channel 33 is within the post-repack television channel plan it experiences an aggregate interference of greater than 2% from other stations. Applicant is, therefore, eligible to relocate and is proposing to operate on channel 34 at an Effective Radiated Power of 15 kW, non-directional. No change in antenna height or location is being proposed.

Television station WCWJ, licensed to Jacksonville, FL, currently operates on channel 34 as its pre-repack channel. WCWJ will ultimately move to channel 20 for its post-repack channel. WBXG-LD will be unable to commence operations on channel 34, due to interference in excess of 0.5% being caused into WCWJ, until WCWJ moves to its post-repack channel. Applicant herein requests a waiver of §73.3517 of the rules to allow acceptance of this application during the special displacement window that opens on April 10, 2018 with the understanding it will not commence operations on channel 34 until WCWJ moves off the channel.

An interference analysis using the post-repack channel database 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 WBXG-LD is not predicted to cause interference in excess of that allowed by the rules. The analysis was performed using the methodology stated in OET-69 using the same software (TVStudy v2.2.5) utilized by the Commission and, therefore, should yield similar results.