

ENGINEERING STATEMENT

GUENTER MARKSTEINER

MINOR MODIFICATION OF LICENSE FILE NUMBER BLTTL-20020730ABD

WXDT-LP, NAPLES FL

PROPOSED: CH 23, 15 KW, NON-DIRECTIONAL, 70.5 m AMSL

This statement supports an application by Guenter Marksteiner, licensee of WXDT-LP, to make a minor change in its licensed facility BLTTL20020730ABD.

Applicant currently operates on UHF channel 23 as an analog station. Applicant proposes to relocate the station to a tower site which is within its existing coverage and flash-cut to digital operation on channel 23 at an Effective Radiated Power of 15 kW using a non-directional antenna.

With this modification, applicant will be converting its current analog facility to digital.

Applicant is also proposing to relocate its transmission facility to a new location on a tower bearing Antenna Structure Registration Number 1038046. A distance check was made to confirm the move meets the criteria of §74.787(a)(4) the Rules. A search was made in §73.56 for Naples, FL. Since Naples, FL, was not found on the list of reference points, the coordinates of the main post office were used. The proposed new location is 38.4 km (23.87 mi) from the coordinates of the post office. There is also substantial overlap of the current and proposed protected contours.

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 WXDT-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.

The Applicant accepts any interference that is predicted to exist to proposed facility by any licensed, authorized, or previously proposed primary TV station. The Applicant also accepts any interference that is predicted to exist to the proposed facility from any secondary TV facility that is given preferential status by the FCC over the facility proposed herein.