

**ENGINEERING STATEMENT
GUENTER MARKSTEINER
MINOR MODIFICATION OF LICENSE FILE NUMBER BLTTL20020730ABE
WZDT-LP, NAPLES, FL
PROPOSED: CH 36, 15 KW, NON-DIRECTIONAL, 70.5 m AMSL**

This statement supports an application by Guenter Marksteiner, licensee of WZDT-LP, to make a minor change in its licensed facility BLTTL20020730ABE.

Applicant currently operates on UHF channel 39 as an analog station. This channel is out of core for the post-repack television band. Applicant is, therefore, eligible to file for relocation during the special displacement window that opened on April 10, 2018. Applicant is proposing to operate on channel 36 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 WZDT-LP 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.