

Exhibit 1  
**NATURE OF THE PROPOSAL  
& ALLOCATION CONSIDERATIONS**  
prepared for  
**Guenter Marksteiner**  
WHDT(DT) Stuart, Florida  
Facility ID 83929  
Ch. 42 700 kW 440 m

*Guenter Marksteiner* (“*Marksteiner*”) is the licensee of digital television station WHDT(DT), Stuart, FL. Following a recent site survey that revealed a seven-second discrepancy in the leased WHDT(DT) tower antenna structure registration latitude;<sup>1</sup> *Marksteiner* herein seeks a Construction Permit to correct the WHDT(DT) site location. No other changes are proposed.

**Figure 1** provides a map showing the service contour of the proposed facility. The map also provides the proposed facility’s principal community coverage contour which completely encompasses the principal community of Stuart, Florida as required in §73.625(c) of the Commission’s Rules. The maximum change/extension of the licensed, predicted 41 dBμ contour in any direction is less than 0.05 km, which is indiscernible on the map and considered de minimis.<sup>2</sup> Therefore, the proposed coordinate correction is believed to comply with the present filing freeze.<sup>3</sup>

The contour distances shown in **Figure 1** were determined using digitized 3 arc-second terrain data to calculate HAAT values along radials spaced at 45 degree increments. An implementation of the Commission's TVFMFS computer program that simulates the TV distance curves along with interpolated HAAT and directional antenna pattern values, was used to calculate noise-limited contour locations.

---

<sup>1</sup> See FCC Antenna Structure Registration (“ASR”) 1028084. The ASR coordinates were corrected in ASR File Number A0980694.

<sup>2</sup> The tower utilized by WHDT(DT) also supports the main antenna for digital television station WFLX, West Palm Beach, FL (Facility ID 39736) and WXEL-TV, West Palm Beach, FL, (Facility ID 61084). The Commission recently granted a similar application to correct the coordinates for these stations, accepting the licensee’s argument that the resulting coverage change was de minimis. (See FCC LMS File Number 0000001980. & FCC LMS File Number:0000007434.) The grant of the WFLX and WXEL applications is precedent for grant of the instant application.

<sup>3</sup> See FCC DA 13-618 Public Notice *Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate*. (April 5, 2013)

Exhibit 1  
**NATURE OF THE PROPOSAL**  
(Page 2 of 2)

Interference studies were performed in accordance with the methods set forth in the Commission's OET Bulletin No 69 ("OET-69"). The results of the studies indicate that no new interference in excess of the 0.5% limit established in the Commission's Third Periodic Review would be caused to existing and authorized stations by the proposed operation. In fact, the only change in predicted interference is with regard to co-channel WXPX-TV, Channel 42, Bradenton, FL (BLCDT-20100713AAA), 243 km distant. As shown by the attached **Table 1**, the grant of the instant application to correct coordinates would result in predicted interference to an additional 250 people or 0.007% of the WXPX-TV population (*based on 2000 U.S. Census Data as before*). This would be expected toward a co-channel facility with the southerly correction in latitude. Such a proposal of 0.007% interference for a coordinate correction should be considered de minimis.

The WHDT(TV) site is located more than 1500 km from the nearest points on the Canadian and Mexican borders and does not require international coordination. The nearest FCC monitoring station is at Vero Beach, FL, at a distance of 121 km from the proposed site. This exceeds the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the area specified in §73.1030(b)(1)(iii). Thus, coordination of the instant proposal with the Table Mountain Radio Receiving Zone at Boulder County, Colorado, is not required. According to the Commission's engineering database, there are no AM broadcast stations located within 3.2 km of the proposed facility.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.

**FIGURE 1**  
**COVERAGE CONTOURS**

prepared February 2016 for

**Guenter Marksteiner**  
**WHDT(DT) Stuart, FL**  
**Facility ID 83929**  
**Ch. 42 700 kW 440m**

Cavell, Mertz & Associates, Inc.  
Manassas, VA

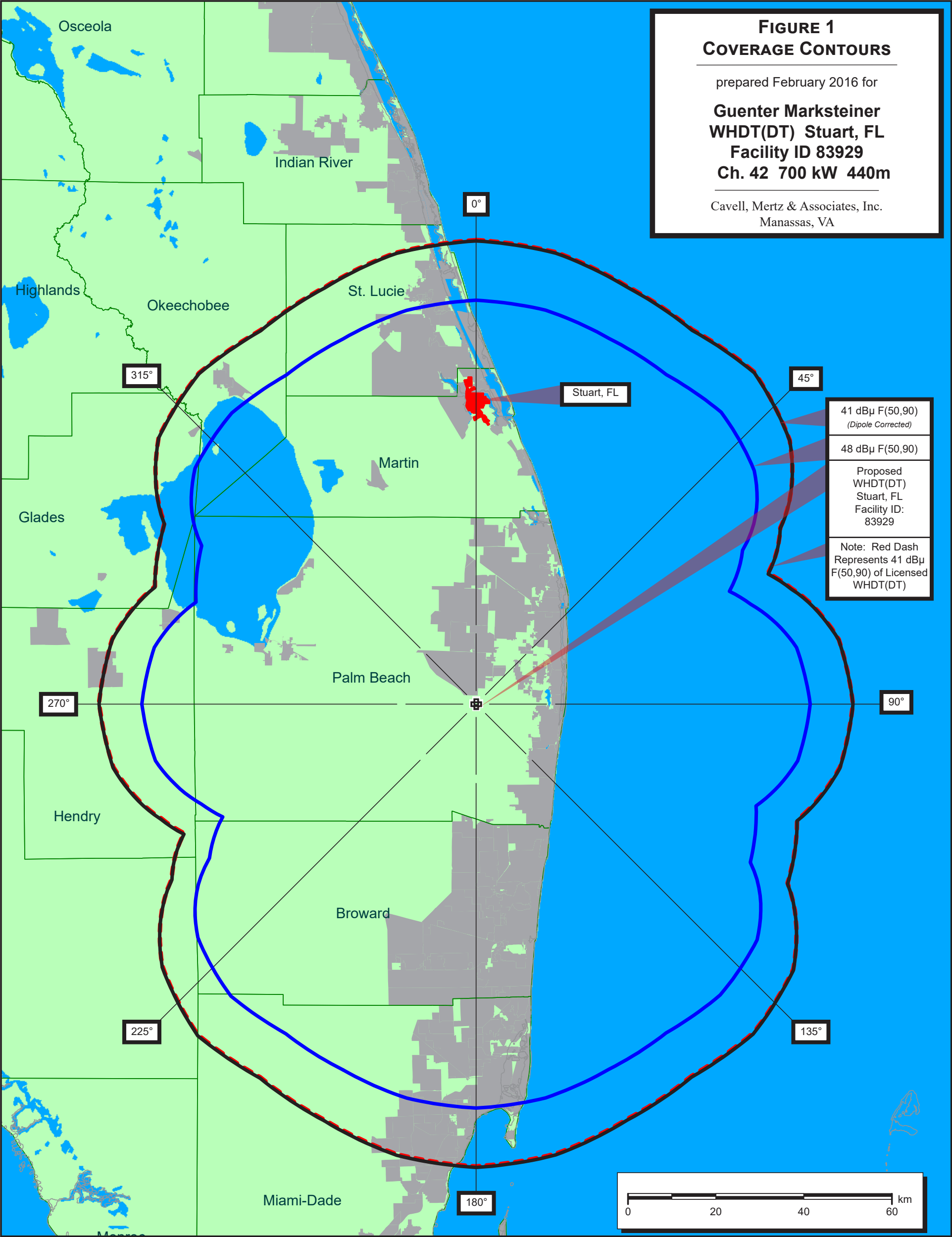


Table I  
**INTERFERENCE STUDY RESULTS**

prepared for

**Guenter Marksteiner**

WHDT(DT) Stuart, FL

Facility Id: 83929

Ch. 42 700 kW

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
41	WJAN-CD	Miami, FL	BPTTA-20010116AGG			--- No Interference ---		
41	WJAN-CD	Miami, FL	BLDTA-20100907ACD			--- No Interference ---		
41	WZVN-TV	Naples, FL	BLCDDT-20030619AAM			--- No Interference ---		
42	WXPX-TV	Bradenton, FL	BLCDDT-20100713AAA	3,760,709	45,856	46,106	250	0.007 %
42	WHDT-DR	Stuart, FL	BPRM-20080620AOT			--- No Interference ---		
43	WWDI-CD	Naples, FL	BLDTA-20110819AAN			--- No Interference ---		
43	WTCN-CA	Palm Beach, FL	BLANK-0000001538			--- No Interference ---		