

**ENGINEERING STATEMENT  
FORT MYERS DTV, LLC  
MINOR MODIFICATION OF CONSTRUCTION PERMIT  
FCC FILE NUMBER 0000152394  
WXDT-LD, NAPLES, FL  
CP: CH 23, 15 KW, NON-DIRECTIONAL, 70.5 m AMSL  
PROPOSED: CH 23, 15 KW, DIRECTIONAL, 96.1 m AMSL**

This statement supports an application by Fort Myers DTV, LLC, permittee of WXDT-LD, to make a minor change in its granted construction permit, FCC File Number 0000152394.

Applicant proposes to modify its construction permit by changing the antenna from non-directional to directional with circular polarization. The antenna make and model will change accordingly. It is also proposed to raise the antenna center of radiation from 70.5 meters to 96.1 meters.

An interference analysis was performed pursuant to the parameters used by the Commission for application interference processing. The results of the analysis shows that the proposed operation using the parameters proposed for the modified WXDT-LD construction permit 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 results of the study performed are attached to this statement.

tvstudy v2.2.5 (4uoc83)  
Database: localhost, Study: WXDT\_MOD, Model: Longley-Rice  
Start: 2023.08.02 16:18:57

Study created: 2023.08.02 16:18:56

Study build station data: LMS TV 2023-08-01

Proposal: WXDT-LP D23 LD APP NAPLES, FL  
File number: WXDT MOD  
Facility ID: 25537  
Station data: User record  
Record ID: 923  
Country: U.S.

Build options:  
Protect pre-transition records not on baseline channel

Search options:  
Non-U.S. records included  
Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	WGPS-LD	N22-	TX	CP	FORT MYERS, FL	BPTTL20140501ACL	7.3 km
No	WGCU	D22	DT	LIC	FORT MYERS, FL	BLANK0000107706	35.6
No	WVEN-TV	D22	DT	LIC	MELBOURNE, FL	BLANK0000100080	243.5
No	WFOR-TV	D22	DT	LIC	MIAMI, FL	BLANK0000205002	173.1
No	WARP-CD	D22	DC	LIC	TAMPA-ST. PETERSBURG, FL	BLANK0000132166	169.5
Yes	WKCF	D23	DT	LIC	CLERMONT, FL	BLANK0000143772	243.5
No	WKBJ-LD	D23	LD	LIC	Jacksonville, FL	BLANK0000108066	420.1
No	WLTW-DT	D23	DT	LIC	MIAMI, FL	BLANK0000205147	173.1
No	WSVT-LD	D23	LD	LIC	TAMPA, FL	BLANK0000130246	151.6
No	WAMI-DT	D24	DT	LIC	HOLLYWOOD, FL	BLANK0000068250	175.1
No	WDSC-TV	D24	DT	LIC	NEW SMYRNA BEACH, FL	BLANK0000090505	246.6
No	WWSB	D24	DT	LIC	SARASOTA, FL	BLANK0000217791	127.6

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D23  
Mask: Stringent  
Latitude: 26 30 19.60 N (NAD83)  
Longitude: 81 51 7.70 W  
Height AMSL: 96.1 m  
HAAT: 0.0 m  
Peak ERP: 15.0 kW  
Antenna: JAM JA/MS-16/D23-36-SCC-BB 60.0 deg  
Elev Pattn: Generic  
Elec Tilt: 0.75

49.7 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	14.4 kW	91.5 m	43.0 km
45.0	14.3	89.6	42.7
90.0	12.7	89.8	42.2
135.0	14.6	91.4	43.0
180.0	5.40	96.0	38.7
225.0	0.630	96.0	27.8
270.0	0.938	94.8	29.7
315.0	9.24	94.4	41.2

Database HAAT does not agree with computed HAAT  
Database HAAT: 0 m Computed HAAT: 93 m

Distance to Canadian border: 1687.0 km

Distance to Mexican border: 1502.9 km

Conditions at FCC monitoring station: Vero Beach FL  
Bearing: 44.3 degrees Distance: 171.7 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 311.0 degrees Distance: 2632.8 km

Study cell size: 1.00 km  
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%  
Maximum new IX to LPTV: 2.00%

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Interference to BPTTL20140501ACL CP scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WGPS-LD	N22-	TX	CP	FORT MYERS, FL	BPTTL20140501ACL	
Undesireds:	WXDT-LP	N23z	TX	LIC	NAPLES, FL	BLTTL20020730ABD	27.4 km
	WXDT-LP	D23	LD	APP	NAPLES, FL	WXDT_MOD	7.3
	WGPU	D22	DT	LIC	FORT MYERS, FL	BLANK0000107706	41.1
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
652.3	148,318	652.3	148,318	0.0	0	0.0	0.00 0.00
Undesired		Total IX		Unique IX, before		Unique IX, after	
WXDT-LP N23z TX LIC		0.0	0	0.0	0		
WXDT-LP D23 LD APP		130.6	52,104			0.0	0
WGPU D22 DT LIC		652.3	148,318	652.3	148,318	521.6	96,214

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Interference to BLANK0000143772 LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WKCF	D23	DT	LIC	CLERMONT, FL	BLANK0000143772	
Undesireds:	WXDT-LP	N23z	TX	LIC	NAPLES, FL	BLTTL20020730ABD	274.7 km
	WXDT-LP	D23	LD	APP	NAPLES, FL	WXDT_MOD	243.5
	WLTU-DT	D23	DT	LIC	MIAMI, FL	BLANK0000205147	303.1
	WYKE-CD	D24	DC	LIC	INGLIS/YANKEETOWN, FL	BLANK0000099919	144.1
	WWSB	D24	DT	LIC	SARASOTA, FL	BLANK0000217791	170.0
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
40687.2	4,242,582	40658.2	4,242,206	40496.2	4,238,437	40493.2	4,238,437 0.01 0.00
Undesired		Total IX		Unique IX, before		Unique IX, after	
WXDT-LP N23z TX LIC		0.0	0	0.0	0		
WXDT-LP D23 LD APP		21.0	732			3.0	0
WLTU-DT D23 DT LIC		20.0	707	19.0	707	4.0	32
WYKE-CD D24 DC LIC		140.0	3,005	140.0	3,005	140.0	3,005
WWSB D24 DT LIC		3.0	57	2.0	57	0.0	0

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Interference to proposal scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WXDT-LP	D23	LD	APP	NAPLES, FL	WXDT_MOD	
Undesireds:	WGPU	D22	DT	LIC	FORT MYERS, FL	BLANK0000107706	35.6 km
Service area		Terrain-limited		IX-free		Percent IX	
4773.1	830,099	4773.1	830,099	4653.3	829,166	2.51	0.11
Undesired		Total IX		Unique IX		Prcnt Unique IX	
WGPU D22 DT LIC		119.8	933	119.8	933	2.51	0.11