

Exhibit 13 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for

**Guenter Marksteiner**

New Digital Companion Station Naples, Florida

Ch. 26 (Digital) 15 kW (MAX-DA)

*Guenter Marksteiner* (“*Marksteiner*”) is the licensee of analog Class A low power television station WYDT-CA, Channel 32, Naples, Florida, Facility ID 25538 (BLTTA-20001208AEW). Currently on file is a pending application for displacement of WYDT-CA (FCC file no. BDISDTA-20120606ACB) specifying Channel 26. On the advice of Commission Staff, the applicant respectfully requests that the pending application be dismissed.

*Marksteiner* now seeks authorization to construct a new digital low power television companion station for WYDT-CA on Channel 26. Further, due to equipment issues at WYDT-CA, expedited processing of the instant digital companion station application is hereby respectfully requested.

### **Nature of the Proposal**

The antenna system for the proposed digital companion facility is a custom panel antenna from the MIG Corporation (USA) Inc. model number *3-DIE-WYDT-Custom* which will be mounted on the existing support structure. The proposed antenna is circularly polarized and directional in the horizontal plane with no electrical beam tilt. A plot of the directional antenna relative field pattern is provided in **Exhibit 13 – Figure 1**. A plot of the antenna elevation relative field pattern is provided in **Exhibit 13 – Figure 2**.

The antenna supporting structure is an existing building in Naples, Florida. The rooftop location is an established multiuser communications site with restricted roof access. Since the existing antenna support structure does not extend more than 20 feet above the height of the existing building, registration is not required according to the Commission’s “TOWAIR” program.

The proposed digital companion facility will operate on Channel 26 using a “simple” out-of-channel emission mask at the authorized WYDT-CA site. **Exhibit 13 - Figure 3** depicts the

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coverage contours (analog 74 dB $\mu$  and digital 51 dB $\mu$ ) of the licensed WYDT-CA facility and the proposed digital companion station.

### **Allocation Considerations**

The instant proposal complies with the Commission's interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69")<sup>1</sup>. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The results, summarized in **Exhibit 13 - Table I**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full service and Class A stations, and 2.0 percent to secondary stations.) Accordingly, the instant proposal complies with Section 74.793 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

### **International Coordination**

The proposed transmitter site is located at such distances from the common U.S. – Canadian and U.S. – Mexican borders that international coordination is not required.

### **Other Allocation Considerations**

The nearest FCC monitoring station is at Vero Beach, Florida, at a distance of 194.7 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in Section 73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the areas specified in Section 73.1030(a)(1) and Section 73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank,

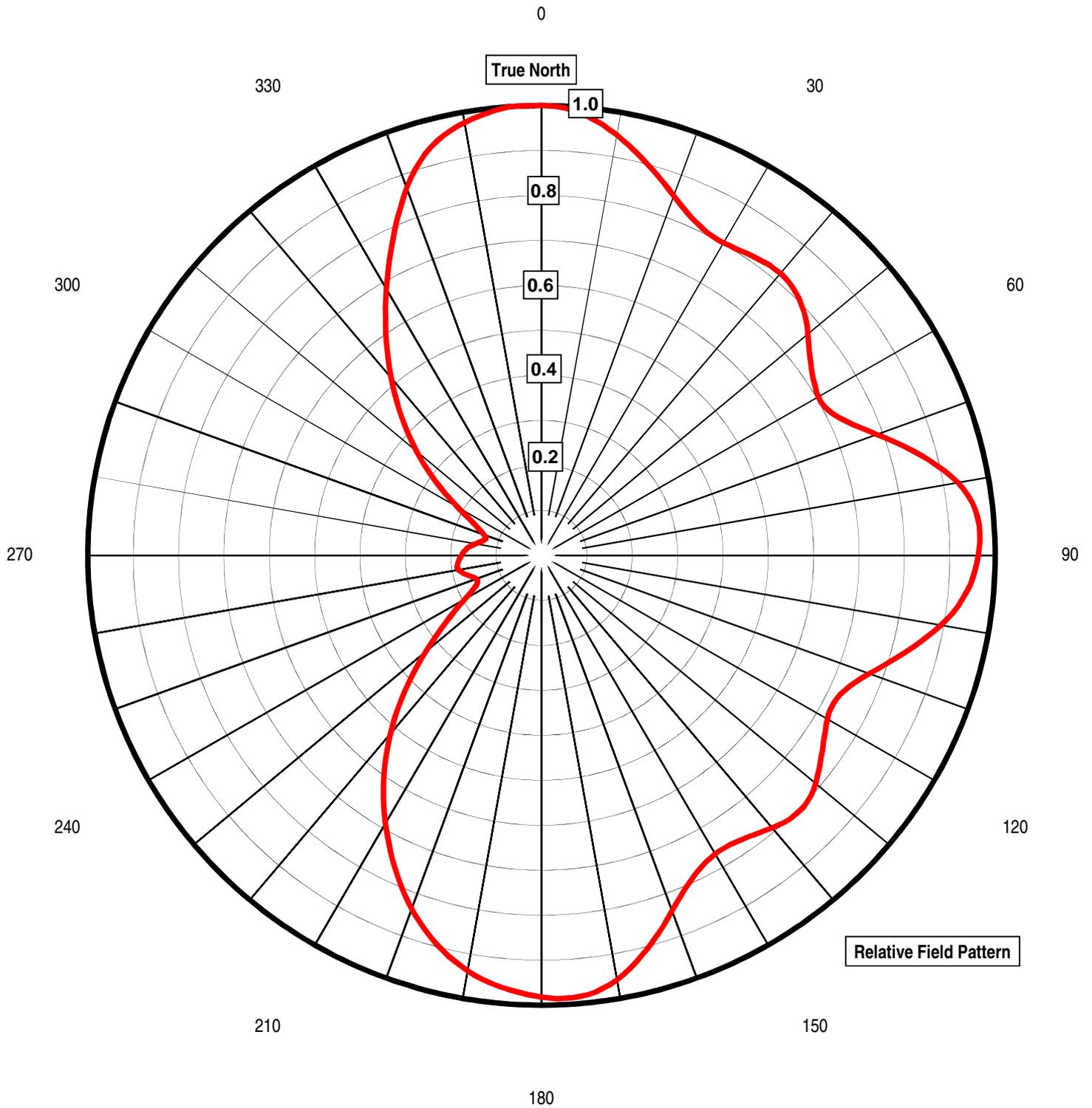
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<sup>1</sup> The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.**

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West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no AM broadcast stations located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

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



**EXHIBIT 13 - FIGURE 1**  
**ANTENNA HORIZONTAL PLANE**  
**RADIATION PATTERN**

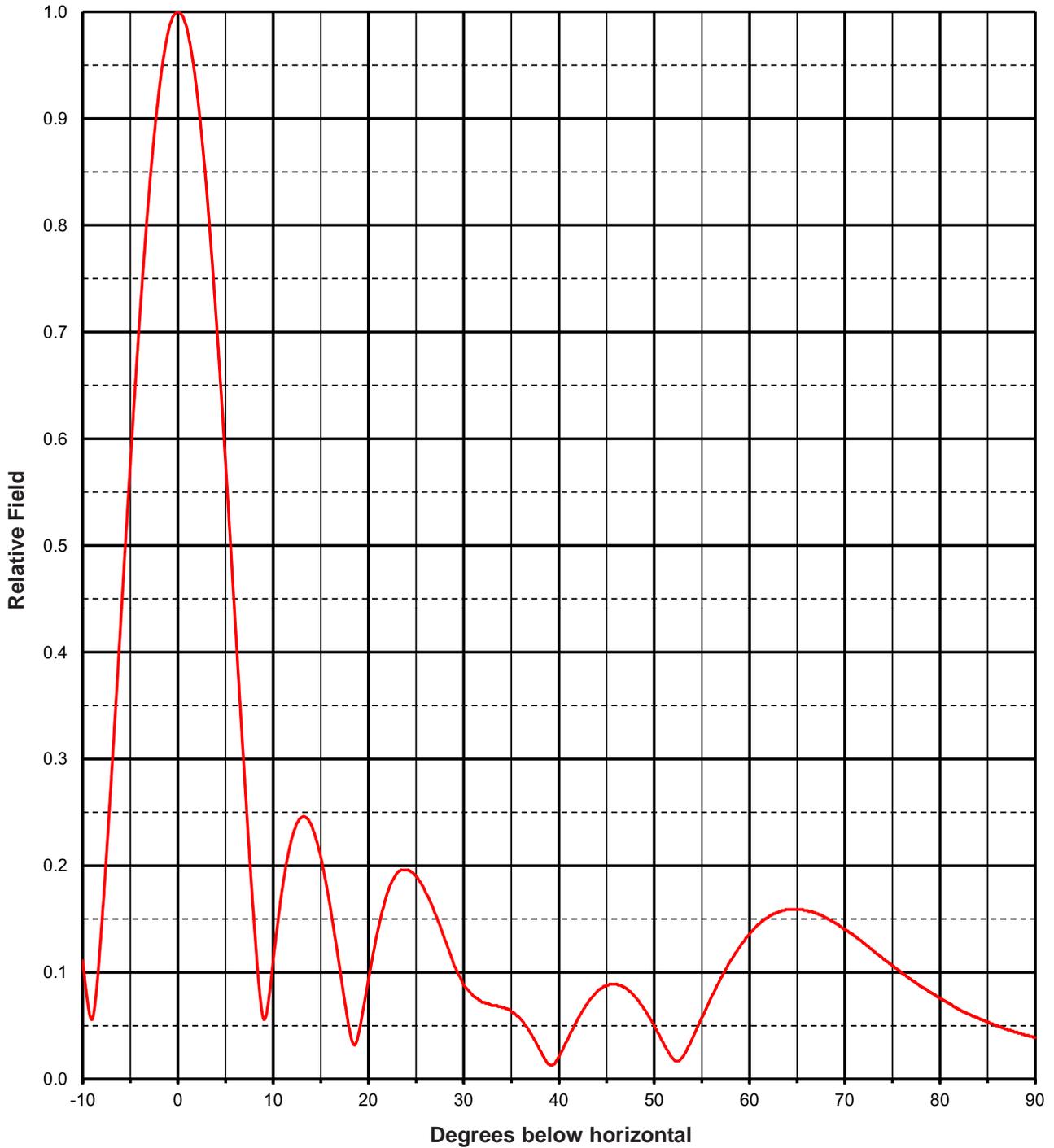
prepared June 2012 for  
**Guenter Marksteiner**  
 New Digital Companion Station  
 Naples, Florida  
 Ch. 26 15 kW (MAX-DA)

**Cavell, Mertz & Associates, Inc.**  
 Manassas, Virginia

**EXHIBIT 13 - FIGURE 2  
ANTENNA VERTICAL PLANE  
(ELEVATION) RELATIVE  
FIELD PATTERN**

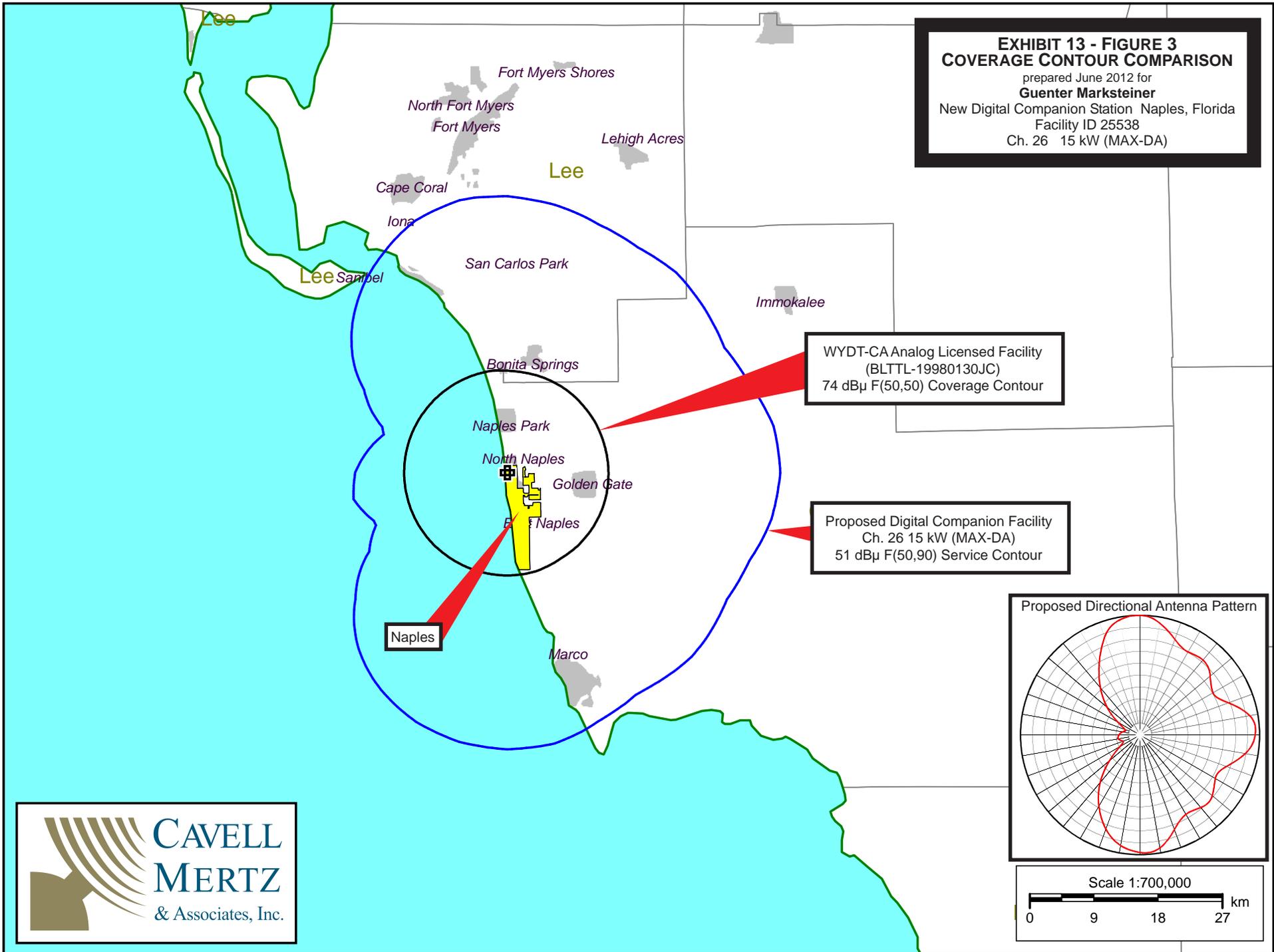
prepared June 2012 for  
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**EXHIBIT 13 - FIGURE 3  
COVERAGE CONTOUR COMPARISON**

prepared June 2012 for  
**Gunter Marksteiner**  
New Digital Companion Station Naples, Florida  
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Ch. 26 15 kW (MAX-DA)



WYDT-CA Analog Licensed Facility  
(BLTTL-19980130JC)  
74 dBμ F(50,50) Coverage Contour

Proposed Digital Companion Facility  
Ch. 26 15 kW (MAX-DA)  
51 dBμ F(50,90) Service Contour

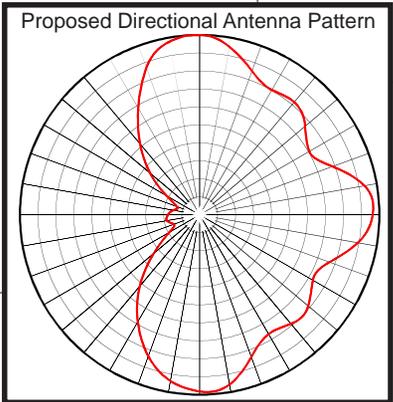


Exhibit 13 - Table I  
**INTERFERENCE STUDY RESULTS SUMMARY**

prepared for

**Guenter Marksteiner**

New Digital Companion Station Naples, FL

Facility Id: New

Ch. 26 15 kW (MAX-DA)

<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>
22	W22CL	Fort Myers, FL	BLTTL-20111108AGV			---	No Interference	---
23	WXDT-LP	Naples, FL	BLTTL-20020730ABD			---	No Interference	---
25	W25DQ	Key West, FL	BLTTL-20060425ABS			---	No Interference	---
25	WIMP-CD	Miami, FL	BLDTA-20091029ABI			---	No Interference	---
25	WIMP-CD	Miami, FL	BSTA-20090924AAI			---	No Interference	---
25	WVEA-TV	Venice, FL	BLCDDT-20060627ABX			---	No Interference	---
25	WBWP-LD	West Palm Beach, FL	BLDTL-20110906AGJ			---	No Interference	---
26	WXAX-LP	Clearwater, FL	BPTTA-20080804ACE			---	No Interference	---
26	WXAX-LP	Clearwater, FL	BMPDTA-20120606ABV			---	No Interference	---
26	WGVT-LD	Gainesville, FL	BLDTL-20080605AAQ			---	No Interference	---
26	W26DP-D	Inverness, FL	BLDTT-20100122AAL			---	No Interference	---
26	WKMG-TV	Orlando, FL	BLCDDT-20090618ABB			---	No Interference	---
26	WXAX-LP	Tampa, FL	BLTTA-20040729AEH			---	No Interference	---
26	W16CC-D	West Gate, FL	BDISDTL-20120217AAX			---	No Interference	---
27	WGZT-LP	Key West, FL	BLTTL-20030804AAH			---	No Interference	---
27	WXEL-TV	West Palm Beach, FL	BLEDT-20040713AAJ			---	No Interference	---