

Exhibit 6 - Statement A  
**ALLOCATION CONSIDERATIONS**

prepared for  
**Guenter Marksteiner**  
WZDT-LP Naples, Florida  
Facility ID 25539  
Ch. 39+ 20.0 kW

*Guenter Marksteiner* (“*Marksteiner*”) is the licensee of analog low power television (“LPTV”) station WZDT-LP, Channel 52, Naples, Florida, Facility ID 25539. Pursuant to the *Report and Order for MM Docket 00-10 (Establishment of a Class A Television Service)*(FCC 00-115, Released April 4, 2000), “We will extend the presumption of displacement to LPTV stations and TV translators authorized on channels 52-59. We will permit these stations to file displacement applications immediately if they can locate a channel within the core spectrum [consisting of channels 2-51].” Accordingly, *Marksteiner* has filed an application (BPTTL-20010712ACP) to substitute Channel 39 (plus offset) for the existing Channel 52 operation. The instant proposal seeks to amend that application, to specify an ERP of 20.0 kilowatts and a different antenna system.

The WZDT-LP antenna will be mounted on top of an existing building and will extend less than 6.096 meters (20 feet) above the top of the building, therefore Antenna Structure Registration with the Commission is not required.

The search for an alternative channel for WZDT-LP found that the TV and DTV spectrum usage is very congested in the Naples, Florida region. No alternative channels were found which meet the contour protection and distance separation requirements of §§74.705, 74.706, and 74.707. Thus, channels were studied to identify any channel which might comply with the interference protection criteria as applied 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*, July 2, 1997 (“OET-69”), and as provided for within §§74.705, 74.706, and 74.707. With the application of OET-69, the instantly proposed Channel 39 is a suitable replacement frequency for WZDT-LP.

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**Interference Analysis, Alternative Application of OET-69,  
and Associated Request for Waiver of §§74.705 and 74.706**

A detailed analysis of the interference that may result from the use of a 20.0 kW directional antenna for WZDT-LP on Channel 39+ has been performed. *The instant proposal complies fully with the contour overlap protection criteria outlined in §74.707.* However, as discussed in detail below, the instantly proposed facility falls short of meeting contour overlap protection criteria or minimum distance separation requirements toward certain full service NTSC and DTV facilities. Application of OET-69's interference analysis methods show that in spite of the inability to meet contour overlap protection criteria or minimum distance separation requirements toward certain full service facilities, no significant interference is predicted to occur.

The instant proposal does not meet the contour overlap protection criteria or minimum distance separation requirements with respect to the following NTSC and DTV stations:

<u>Call</u>	<u>Ch.</u>	<u>City, State</u>
WBZL(TV)	39z	Miami, FL
WFTV-DT	39	Orlando, FL
WTVK(TV) (LIC & CP)	46z	Naples, FL

These facilities were considered in OET-69 studies of the potential interference which might result from the instant application. As discussed in the following, the instant proposal is not predicted to cause significant interference to any of these facilities.

§§74.705 and 74.706 provide for the use of the procedures outlined in OET Bulletin No. 69 to request a waiver of the interference protection rules to demonstrate that the proposed facility would not be likely to cause interference. As discussed herein, all alternative channels have been considered under the standard FCC LPTV protection criteria. When no alternatives were identified, OET-69 was considered to aid in showing that the instantly proposed use of Channel 39 is not predicted to cause any significant interference to NTSC or DTV facilities.

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Accordingly, a study was conducted to evaluate the change in interference to pertinent NTSC and DTV facilities that may be attributed to the proposed Channel 39 facility. A detailed interference study was conducted in accordance with OET-69.<sup>1</sup> The interference study examined the net change in interference as experienced by NTSC and DTV stations that would result from the proposal.

The facilities listed above are shown in **Exhibit 6 - Table I** with summary information regarding the findings of the studies. Any increase in interference to NTSC or DTV facilities is zero, when rounded to the nearest whole percent (per Commission policy). No interference is predicted to any other full service NTSC or DTV station. Thus, this proposal is believed to be in compliance with Commission policy regarding LPTV interference protection criteria toward full service facilities.

Accordingly, based on the results of this allocation study, it is believed that there will be no impact to NTSC facilities, DTV facilities, LPTV facilities, or Class A television facilities as a result of the instant proposal. Nevertheless, if waivers of §§74.705 and 74.706 are required, then such waivers are respectfully requested on behalf of *Guenter Marksteiner* for the reasons stated above.

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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 standard terrain profile step size of 1 km and cell size of 2 km were used. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

Exhibit 6 - Table I  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for  
**Guenter Marksteiner**  
WZDT-LP Naples, Florida  
Facility ID 25539  
Ch. 39+ 20.0 kW

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Service Population</u> (2)	<i>---- Unique Interference ----</i> <i>from WZDT-LP</i>	
					<u>Population</u> (3)	<u>Percentage</u> (4)
WZBL(TV) (LIC)	Miami, FL 39z NTSC	161.0	-----no interference caused-----		0	0.00
WFTV-DT (LIC)	Orlando, FL 39 DTV	273.5	-----no interference caused-----		0	0.00
WTVK(TV) (LIC)	Naples, FL 46z NTSC	30.6	-----no interference caused-----		0	0.00
WTVK(TV) (CP)	Naples, FL 46z NTSC	64.9	-----no interference caused-----		0	0.00

Notes:

- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table  
For NTSC stations, total population within noise-limited contour
- (2) Interference-free service population per OET-69 before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal
- (4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "Additional Application Processing Guidelines for Digital Television"