Exhibit 6 - Statement A

ALLOCATION CONSIDERATIONS

prepared for

Guenter Marksteiner

WXDT-LP Naples, Florida

Facility ID 25537

Ch. 23z 24.7 kW

Guenter Marksteiner ("Marksteiner") is the licensee of analog low power television ("LPTV") station WXDT-LP, Channel 15, Naples, Florida, Facility ID 25537. WXDT-LP has been *displaced* from Channel 15 due to the allotment of Channel 15 as a paired DTV channel for WBBH(TV), Channel 20, Fort Myers, Florida, 69.2 km distant. Pursuant to the *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order for MM Docket 87-268 (Advanced Television Systems and Their Impact on Existing Television Broadcast Service)*(FCC 98-24, Released February 23, 1998), "applications for displacement relief may be submitted at any time during the transition process." Due to the displacement of WXDT-LP by WBBH-DT, *Marksteiner* herewith seeks to substitute Channel 23 (zero offset) for the existing Channel 15 operation. The applicant also seeks to increase the WXDT-LP effective radiated power from 17.0 kilowatts to 24.7 kilowatts. An application for Class A License is being filed concurrently on FCC Form 302-CA to cover the instant displacement application.

The WXDT-LP antenna will be mounted on top of a building and will extend less than 6.096 meters (20 feet) above the top of the building, therefore registration with the Commission is not required.

The search for an alternative channel for WXDT-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 23 is a suitable replacement channel for WXDT-LP.

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 24.7 kW directional antenna for WXDT-LP on Channel 23z 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:

Call	Ch.	City, State
WLTV(TV)	23-	Miami, FL
WMFE-DT	23	Orlando, FL
WGCU(TV)	30z	Fort Myers, 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 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 23 is not predicted to cause any significant interference to NTSC or DTV facilities.

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 23 facility. A detailed interference study was conducted in accordance with OET-69.[1] 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.

[1]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. The Longley-Rice computer program input data, following the guidelines established under OET-69, includes a location variability of 50%, a time availability of 10%, a situation variability of 50%, horizontal polarization, 0.005 S/m conductivity, a climate constant of 15, an assumption of a continental temperate climate zone, and a receive antenna height of 10 meters. The service area for each DTV facility under study is that area predicted to receive signal levels of at least 41 dBμ using the Longley-Rice methodology, and within the DTV F(50,90) service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 50 kW or 1,000 kW, the Grade B contour of the associated analog station (as authorized April 3, 1997) is used to determine the extent of the DTV station's service area. The F(50,90) DTV service contour level is established by the formula 41 - 20log[615/(channel mid-frequency)] dBμ. The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 64 dBμ using the Longley-Rice methodology, and within the NTSC F(50,50) service contour distance as determined per §73.684. The F(50,50) NTSC service contour level is established by the formula 64 - 20log[615/(channel mid-frequency)] dBμ. Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

Exhibit 6 - Table I

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Guenter Marksteiner

WXDT-LP Naples, Florida

Facility ID 25537

Ch. 23z 24.7 kW

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Service Population (2)	---- *Unique Interference from WXDT-LP* ---- Population (3)	Percentage (4)
WLTV(TV) (LIC)	Miami, FL 23- NTSC	161.3	3,797,971	3,795,890	0	0.00
WMFE-DT (CP)	Orlando, FL 23 DTV	275.3	1,954,000	2,376,961	0	0.00
WGCU(TV) (LIC)	Fort Myers, FL 30Z NTSC	68.1	649,849	622,761	1,230	0.19

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"*