

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**Guenter Marksteiner**  
WYDT-CA Naples, Florida  
Facility ID 25538  
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). *Marksteiner* originally intended to “flash-cut” the WYDT-CA analog operation to digital. However, due to excessive predicted interference caused to a first-adjacent channel full service station, WYDT-CA is considered displaced. Accordingly, the instant application proposes digital operation for WYDT-CA on a different channel in accordance with Section 73.3572(a)(4)(iii) of the Commission’s rules.

**Nature of the Proposal**

WYDT-CA is located 68.1 km from full service, first adjacent channel station WGCU(TV)<sup>1</sup>, Channel 31, Facility ID 62388, Fort Myers, Florida. As an analog Class A operation, WYDT-CA is predicted to cause 0.348% interference to the licensed WGCU(TV) facility and 0.178% interference to the WGCU(TV) CPMoD facility. Both levels of interference are below the Commission’s limit of 0.5%. However, as a digital Class A facility, WYDT-CA<sup>2</sup> is predicted to cause new interference to WGCU(TV) in excess of the Commission’s limit regardless of the “out-of-channel” emission mask employed. Specifically:

<u>WGCU(TV) Facility Studied</u>	<u>Simple mask (% new IX)</u>	<u>Stringent mask (% new IX)</u>	<u>Full Service mask (% new IX)</u>
CPMoD Facility - BMPEDT-20120419AAP	13.21	8.09	2.53
Licensed Facility - BLEDT-20080922AEM	12.92	10.46	2.45

Based on the foregoing, it is believed that the WYDT-CA qualifies for displacement pursuant to Section 73.3572(a)(4)(iii) of the Commission’s rules.

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<sup>1</sup> WGCU(TV) license file number BLEDT-20080922AEM and construction permit BMPEDT-20120419AAP.

<sup>2</sup> The interference studies were conducted using the directional antenna pattern proposed herein and an ERP of 15 kW. A reduction in ERP to approximately 0.2 kW would be needed to protect the WGCU(TV) licensed facility. Such a drastic reduction in power would limit coverage and service to the public.

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
(Page 2 of 3)

The antenna system for the proposed digital WYDT-CA facility is a custom panel antenna from the MIG Corporation (USA) Inc. model number *3-DIE-WYDT-Custom* and will replace the existing WYDT-CA antenna 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 pattern is provided in **Exhibit 11 – Figure 1**. A plot of the antenna elevation relative field pattern is provided in **Exhibit 11 – 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 facility will operate on Channel 26 using a “simple” out-of-channel emission mask at the authorized WYDT-CA site. **Exhibit 11 - Figure 3** depicts the coverage contours (analog 74 dBμ and digital 51 dBμ) of the licensed and proposed facilities.

**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>3</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 11 - 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

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<sup>3</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.**

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
(Page 3 of 3)

regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

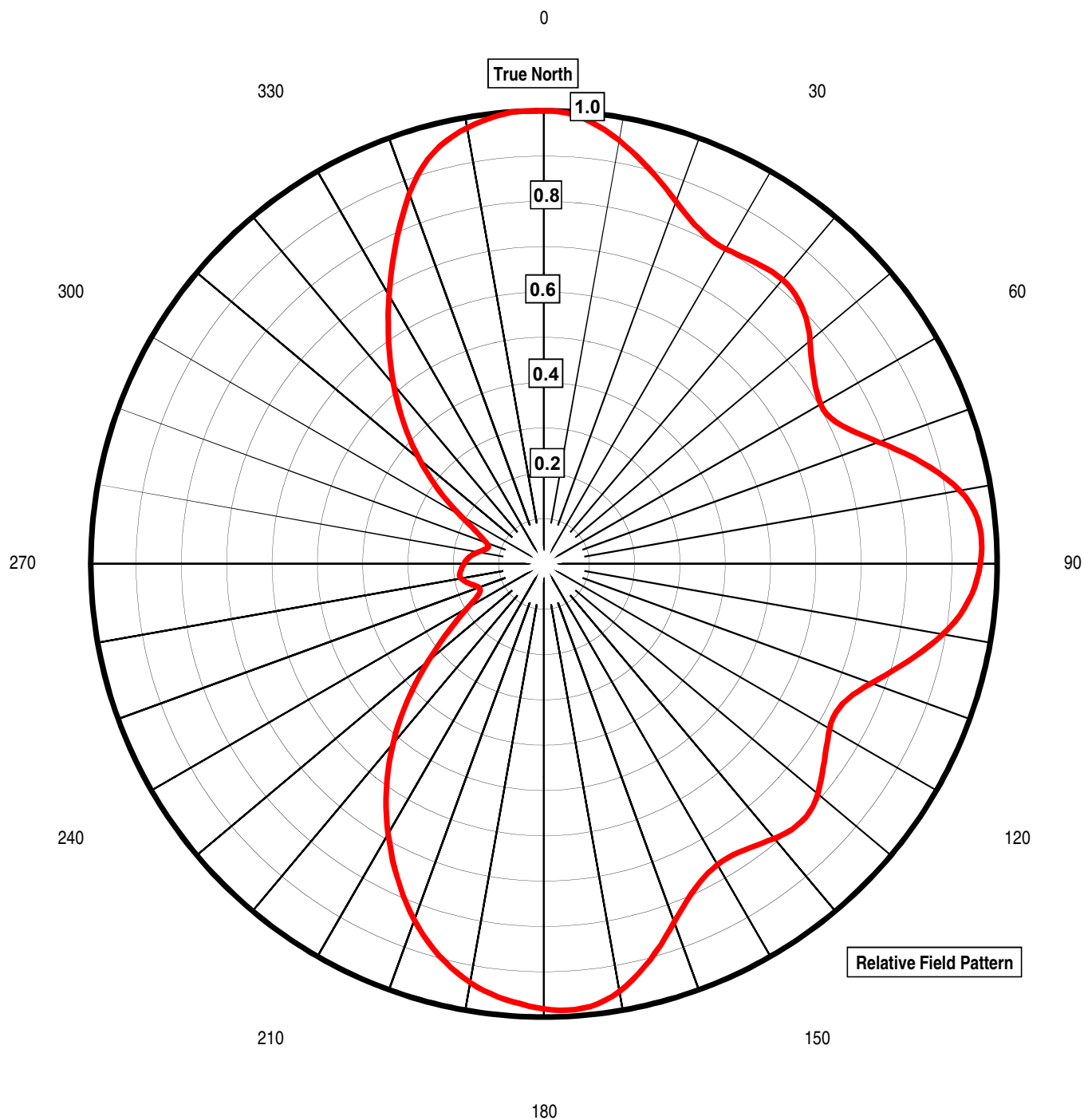
**International Coordination**

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, 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 11 - FIGURE 1**  
**ANTENNA HORIZONTAL PLANE**  
**RADIATION PATTERN**

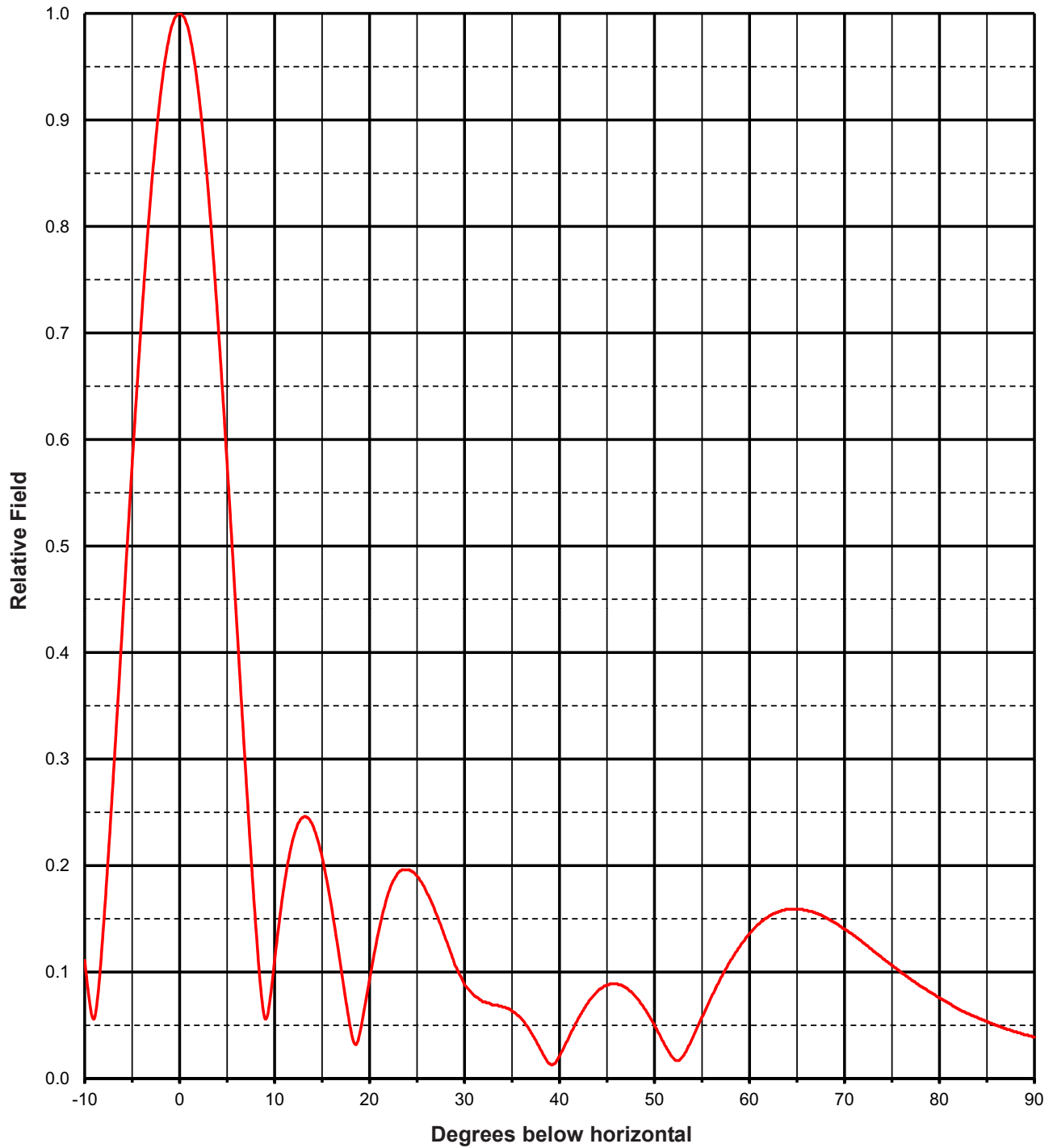
prepared May 2012 for  
**Guenter Marksteiner**  
WYDT-CA Naples, Florida  
Facility Id 25538  
Ch. 26 15 kW (MAX-DA)

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

**EXHIBIT 11 - FIGURE 2  
ANTENNA VERTICAL PLANE  
(ELEVATION) RELATIVE  
FIELD PATTERN**

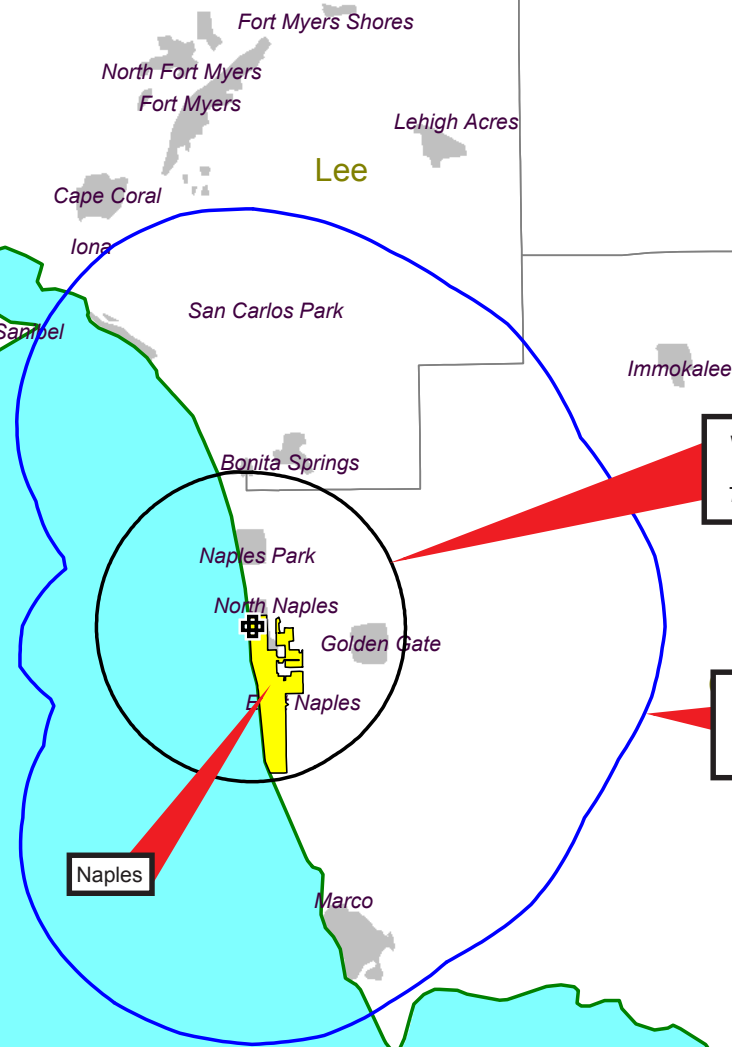
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**EXHIBIT 11 - FIGURE 3  
COVERAGE CONTOUR COMPARISON**

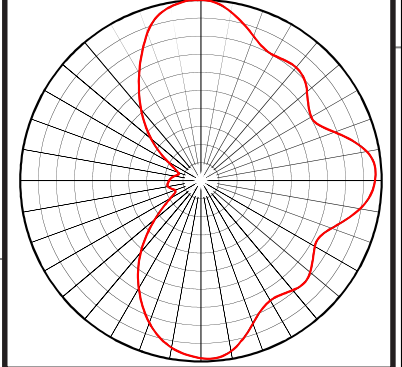
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WYDT-CA Analog Licensed Facility  
(BLTTL-19980130JC)  
74 dBμ F(50,50) Coverage Contour

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

Proposed Directional Antenna Pattern



Scale 1:700,000

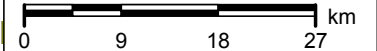


Exhibit 11 - Table I  
**INTERFERENCE STUDY RESULTS SUMMARY**

prepared for

**Guenter Marksteiner**

WYDT-CA Naples, FL

Facility Id: 25538

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	BLTTTL-20111108AGV			---	No Interference	---
23	WXDT-LP	Naples, FL	BLTTTL-20020730ABD			---	No Interference	---
25	W25DQ	Key West, FL	BLTTTL-20060425ABS			---	No Interference	---
25	WIMP-CD	Miami, FL	BSTA-20090924AAI			---	No Interference	---
25	WIMP-CD	Miami, FL	BLDTA-20091029ABI			---	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	BDFCDTA-20110825AAH			---	No Interference	---
26	WXAX-LP	Clearwater, FL	BPTTA-20080804ACE			---	No Interference	---
26	WGVV-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	BLTTTL-20030804AAH			---	No Interference	---
27	WXEL-TV	West Palm Beach, FL	BLEDT-20040713AAJ			---	No Interference	---