[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 152214 Channel 209

Description of Exhibit 13 Contents

This exhibit demonstrates that the proposed facility complies with contour overlap and interference protection provisions in all of the applicable rule sections and that this application for a construction permit is in full compliance with 47 C.F.R. § 74.1204.

Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.

Page 2 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference provisions based on 47 C.F.R. § 74.1204(d), which states:

> *[A]n application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such other factors as may be applicable.*

Page 3 of this exhibit contains the tabulated data from the interference analysis, which shows all stations whose protected contours come within 50 km of the 34 dBµ F(50,10) contour of the proposed translator. These tabulated values were calculated using data from the FCC's CDBS files and 30 arc second terrain data. The column labeled "Adj" shows the number of channels difference between the entry and the proposed translator. The column labeled "Dist" shows the distance in km. The column labeled "Overlap" shows the area of contour overlap in square kilometers.

Page 4 of this exhibit is a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by Google with the calculated area of interference overlaid. The area of interference was calculated using the free space equation and 120 radials.

Compliance with 47 C.F.R. § 74.1204(d)

All authorized second and third adjacent stations with which the proposed translator has contour overlap are tabulated below. Column four show the station's signal level at the proposed translator's tower site, and column five gives the minimum value within the entire standard interfering contour of the proposed translator (100 dBµ for most classes, 94 for class B, 97 for class B1). The minimum second or third adjacent F(50,50) contour within the proposed translator's standard interfering contour was used to calculate the proposed translator's actual "worst-case" interfering contour.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1017980	BLED20040927ALP	WABE	70	69.7
1198644	BPED20070820ABQ	WABE	70	69.7
			Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour	**69.7**

FCC 02-244 at Section II.A.5 states that "when demonstrating that 'no actual interference will occur due to . . . other factors,' pursuant to Section 74.1204(d), an applicant may use the undesired-to-desired signal ratio method." The undesired-to-desired ratio for second and third adjacent stations required by § 74.1204(a) is 40 dB. Since the minimum protected contour strength within the proposed translator's standard interference contour is **69.7 dBµ**, this makes the proposed translator's worst-case interfering contour **109.7 dBµ.** By the free-space equation, this contour is calculated to extend a maximum of **170.3 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population"). Hence, in accordance with 47 C.F.R. § 74.1204(d) and the clarification provided by the FCC in the decision *Re: Living Way Ministries* (FCC 02-244), a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

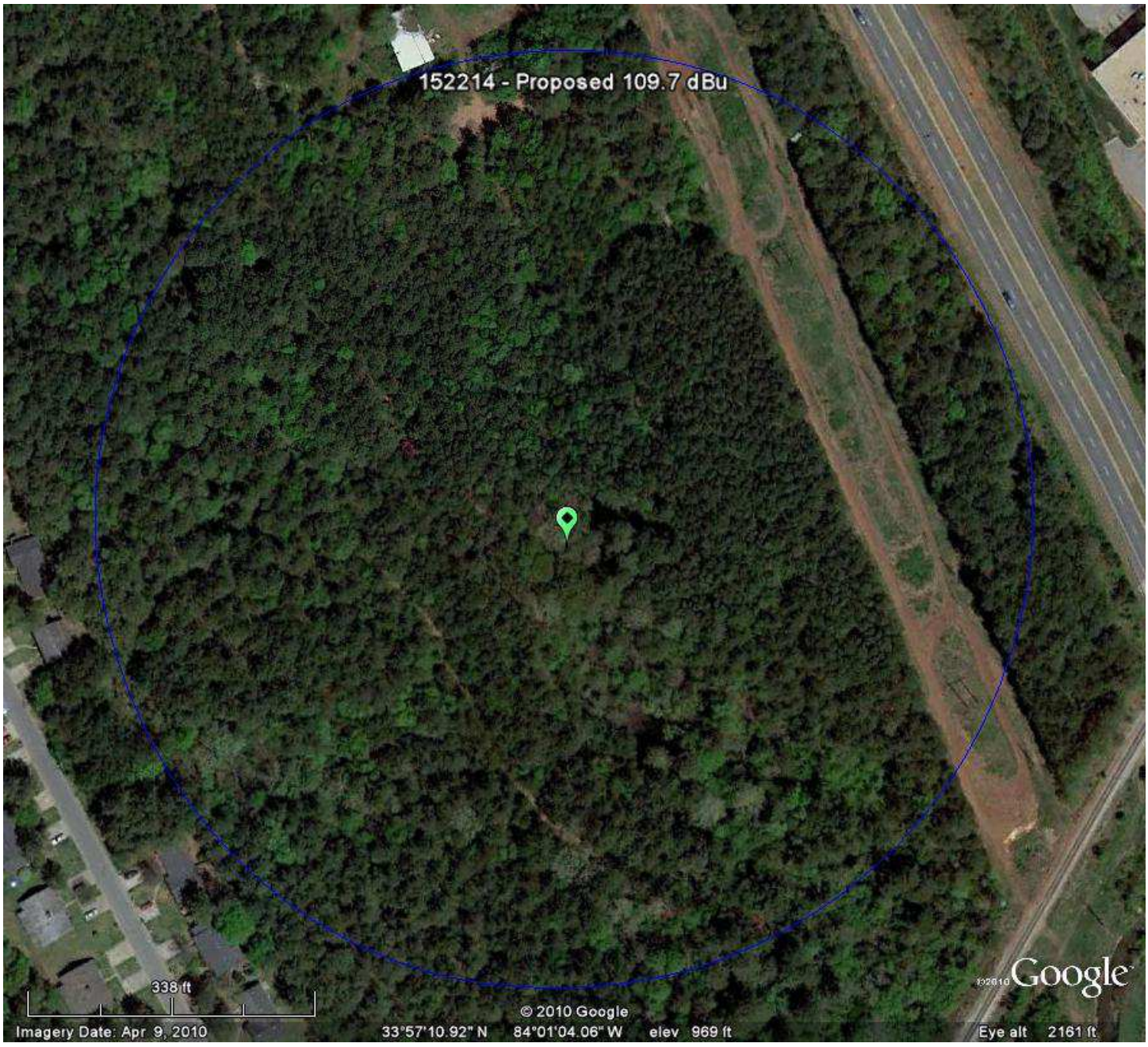
Antenna Manufacturer:	**NIC**
Antenna Model:	**BLD1/P**
CORAGL:	**31 m**
Maximum ERP:	**0.055 kW**
Interfering Contour:	**109.7 dBµ**
Max Int. Contour Distance:	**170.3 m**

Adjacent Channel Study
For Station W209CD, Facility_id: 152214

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1198644	3538	BPED	20070820ABQ	WABE	BOARD OF EDUCATION, CITY OF ATLANTA	C0	ATLANTA	GA	CP	100	615	211	2	36.3	0.3282
1017980	3538	BLED	20040927ALP	WABE	BOARD OF EDUCATION, CITY OF ATLANTA	C1	ATLANTA	GA	LIC	96	531.2	211	2	36.4	0.3282
1332761	5125	BLED	20090909AAI	WYFW	BIBLE BROADCASTING NETWORK, INC.	A	WINDER	GA	LIC	6	333	208	1	23.9	0
1208736	54585	BLED	20071001DQH	WRFG	RADIO FREE GEORGIA BROADCASTING FOUNDA	C1	ATLANTA	GA	LIC	65	432	207	2	33.8	0
1350987	150669	BPFT	20091222ARP	W209CG	EDGEWATER BROADCASTING INC.	D	TALLAPOOSA	GA	CP	0.038	345	209	0	43.8	0
83875	6706	BLED	19851202KD	WBCX	BRENAU COLLEGE	A	GAINESVILLE	GA	LIC	0.84	447	206	3	44.1	0
1350599	150669	BLFT	20091221AIU	W209CG	EDGEWATER BROADCASTING INC.	D	TALLAPOOSA	GA	LIC	0.01	476	209	0	44.7	0
1213950	176071	BNPED	20071022AQA	NEW	COMMON GROUND ATHENS, INC.	A	NICHOLSON	GA	CP	1	338.5	210	1	58.5	0
581027	76477	BLED	19980915AAA	WNGU	GEORGIA PUBLIC TELECOMMUNICATIONS COMM	A	DAHLONEGA	GA	LIC	0.75	573	208	1	63.6	0
1394038	172935	BLED	20100726AIQ	WAKP	NETWORK OF GLORY, INC.	A	SMITHBORO	GA	LIC	2.9	219	206	3	84	0

Prepared by Ben McCarron
October 11, 2010


152214 - Proposed 109.7 dBu
338 ft
© 2010 Google
Imagery Date: Apr 9, 2010
33°57'10.92" N 84°01'04.06" W elev 969 ft
Eye alt 2161 ft
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