

**BNPFT-20180131ACA**  
**Washington, North Carolina**  
**Long Form Application**  
**For New FM Translator**  
**On Channel 225**  
**by**  
**CMG Coastal Carolina, LLC**

**Exhibit 13**  
**Interference Analysis**

**November 2018**

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Declaration

I declare, under penalty of perjury, that I am a technical consultant to broadcasting and other communications systems, that I have over twenty-five years of experience in the engineering of broadcast and other communications systems, that I am familiar with the Federal Communications Commission's Rules found in the Code of Federal Regulations Title 47, that I am a Professional Engineer registered in North Carolina, that I have prepared or supervised the preparation of the attached Exhibit 13, Interference Analysis, for CMG Coastal Carolina, LLC, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief.



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1 November 2018

### Narrative

This Exhibit supports a long form application for FM translator BNPFT-20180131ACA, on Channel 225 in Washington, North Carolina. Allocation details are provided in this exhibit. This proposal complies fully with the requirements of 74 C.F.R. §74.1204(a), with the exception of facilities protected under 47 C.F.R. §74.1204(d) by the Undesired to Desired (U/D) method described below. The proposed modified facilities create no mutual exclusivities with any licensed facilities, construction permits, or applications as shown in the allocation table in this exhibit.

Figure 1 shows the original Tech Box and proposed 60 dBu F(50,50) coverage areas. Figure 1 shows fill-in status confirmation.

This is a long form application in response to a Media Bureau Public Notice announcing an FM Translator filing window for long-form applications<sup>1</sup>. The short form application is File Number BNPFT-20180131ACA, application reference number 1776771.

The changes from the Tech Box parameters are permissible for minor modifications, as shown in Figure 1. The only change is a reduction in height above ground and height above mean sea level of 1 meter.

### Allocations

This application proposes service to Washington, North Carolina, on channel 225. An updated Table 1: Allocations is included in this exhibit with a list of the stations, construction

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<sup>1</sup> See *Public Notice: MEDIA BUREAU ANNOUNCES AUCTION 100 FM TRANSLATOR FILING WINDOW FOR LONG-FORM APPLICATIONS*, DA 18-986, released October 2, 2018.

permits, allocations, and applications studied. All authorizations are protected under §74.1204(a) contour protection by this application, with the exception of facilities protected by the Undesired to Desired (U/D) method.

Where the outgoing protection is provided by interference contours with a separation of less than 3.2 kilometers (2 miles), the lack of overlap is plotted in figures in this exhibit, and the output of the FM Over program is provided. For this application, there is one (1) facility for which additional detail is provided.

Table and Figure	Call Sign	Location	Channel, class and relationship
3	W225CD	Kinston, North Carolina	225D, co-channel

Table 1: Allocations

Allocation Study CMG Coastal Carolina, LLC											
REFERENCE		CH# 225D - 92.9 MHz, Pwr= 0.25 kw, HAAT= 130.5 M, COR= 139 M						DISPLAY DATES			
35 29 14.0 N.		Average Protected F(50-50)= 14.7 km						DATA 11-01-18			
77 02 42.0 W.		Omni-directional						SEARCH 11-01-18			
CH CITY	CALL	TYPE STATE	ANT	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
225D Washington	1776771!	APP NC	C	0.0 0.0	0.00 BNPFT20180131ACA	35 29 14.0 77 02 42.0	0.250	140	---Reference--- CMG Coastal Carolina, LLC		
Short form application for which this is the long form application.											
227C Washington	WERO	LIC NC	CN	246.9 66.7	34.39 BLH19791206AF	35 21 55.0 77 23 38.0	100.000 543	13.0 554	89.4 Dick Broadcasting Company	7.0	-56.1*
Protected by U.D signal ratio studies, see text and figures.											
224C2 Pine Knoll Shores	WBNK	LIC NC	NCX	143.7 324.0	83.07 BMLH20180405AAC	34 53 01.0 76 30 22.0	11.500 228	68.4 228	46.3 Educational Media Foundation	-0.1	14.5
225D Kinston	W225CD	LIC NC	C	248.3 67.9	60.53 BLFT20150114AAI	35 17 03.0 77 39 53.0	0.250	40.8 106	11.9 Eastern Airwaves, LLC	5.4	0.2
224D Greenville	1786767	APP NC	DC	279.5 99.3	34.24 BNPFT20180125AGP	35 32 15.0 77 25 06.0	0.250	3.0 106	2.1 Pirate Media Group, LLC	16.7	6.7
225B Suffolk	WVBW	LIC VA	CN	20.6 201.0	165.21 BMLH19880519KD	36 52 35.0 76 23 28.0	50.000 148	137.0 150	64.3 Mhr License LLC	13.5	35.4
279C1 Williamston	WTIB	LIC NC	DCX	6.6 186.7	45.92 BMLH20101022AAA	35 53 54.0 76 59 10.0	100.000 299	0.0 305	0.0 Inner Banks Media, LLC	21.5R	24.4M
225D Jacksonville	W225CV	CP NC	C	202.4 22.1	88.68 BNPFT20171201AEJ	34 44 56.0 77 24 51.0	0.250	36.0 81	10.6 Heritage Broadcasting, LLC	38.2	29.2
225C Dillon	WEGX	LIC SC	CX	239.7 58.4	242.04 BMLH20140905AAY	34 22 04.0 79 19 21.0	100.000 493	189.8 521	85.9 Amfm Radio Licenses, L.L.C	37.9	107.6
222C1 Jacksonville	WQSL	CP NC	NCN	200.2 20.0	117.51 BPH20180312ABK	34 29 41.0 77 29 19.0	100.000 245	9.1 253	67.6 Dick Broadcasting Company	93.9	48.8
224D Goldsboro	W224DD	LIC NC	C	262.1 81.6	88.49 BLFT20160810AAF	35 22 27.0 78 00 43.0	0.250	16.1 110	11.2 Eastern Airwaves LLC	57.9	55.5
223C0 Henderson	WYFL	LIC NC	DCX	308.5 127.8	132.71 BLED20140723ACU	36 13 30.0 78 12 10.0	100.000 308	10.4 403	73.5 Bible Broadcasting Network	107.4	58.1
222C2 Jacksonville	WQSL	LIC NC	CN	198.9 18.7	113.67 BLH19950612KD	34 31 10.0 77 26 52.0	22.500 221	5.7 226	51.8 Dick Broadcasting Company,	93.4	60.8
222D South Goldsboro	W222AO	LIC NC	C	264.5 83.9	85.80 BLFT20130814ADK	35 24 33.4 77 59 15.0	0.250 98	1.1 132	12.6 Radio Training Network, Inc	70.3	72.1

Terrain database is GLOBE 30 Sec, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM  
 In & Out distances between contours are shown at closest points. Reference Zone= East Zone, Co to 3rd adj.  
 All separation margins (if shown) include rounding. Call signs with exclamation marks need not be protected.  
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)  
 "\*"affixed to 'IN' or 'OUT' values = site inside restricted contour.  
 < = Station meets FCC minimum distance spacing for its class.

**Table 2: Facilities Protected by U/D Method**

Facility	WERO Washington, North Carolina
Relationship	227C, second adjacent
Distance (km)	34.39
Bearing (degrees)	246.9
ERP (kW, on azimuth)	100.0
HAAT (m, on azimuth)	544.6
Ratio	40
Signal Strength (dBu)	83.99
Translator Signal Strength	123.99
Translator distance (km)	.07

**Undesired to Desired Method under §74.1204(d)**

A waiver of §74.1204(d) is requested to show protection to some facilities through the use of Undesired to Desired Signal Strength Ratio (U/D) calculations. Table 2 lists the parameters studied. The antenna is a two level full wave spaced SWR FMEC/2 antenna. The elevation pattern is shown in Figure 2.

The WERO field strength calculated at ground level is 83.99 dBu, using the FM Curves calculator on the FCC web site. For the translator interference contour, free space calculations are used. The corresponding 123.99 dBu field strength distance is .07 kilometers (70 meters) in the horizontal plane. The proposed antenna location is 129 meters above ground. Figure 4 is an elevation plot of the interference contour. Figure 5 is a topographic map of the transmitter site, showing that the site is on a level to gently rolling terrain. Figure 6 is a Google Earth aerial photograph with a 123.99 dBu field strength contour plotted. The only structure within either contour is the transmitter building. Note that as Figure 4 shows, the interference contours remain more than 100 meters (328 feet) above ground, and there are no tall buildings in the area. There is no population within the predicted interference area and therefore this facility is permitted under §74.1204(d).

The applicant recognizes that the U/D method is only a tool for predicting likely interference. Should any actual interference be experienced, the applicant will cooperate fully in correcting the interference. Corrective steps may require changes in the transmitting antenna or other steps which would require Commission authorization, may require that the translator cease operation except for brief equipment tests, or may require filtering at the receivers which report interference.

#### Source of Data

Transmitter location, effective radiated power, directional antenna pattern, and elevation data are extracted from the Commission's CDBS. All contours for existing and proposed facilities are calculated using height above average terrain calculated at one degree horizontal increments.

The contours were evaluated using terrain extracted from the GLOBE 30 arcsecond terrain database, formatted by V-Soft Communications to work with its allocation and mapping programs.



Table 3: FMOver analysis with respect to W225CD

11-01-2018 Terrain Data: GLOBE 30 Sec FMOver Analysis

W225CD BLFT20150114AAI

1776771

Channel = 225D  
 Max ERP = 0.25 kw  
 RCAMSL = 106 m  
 N. Lat. 35 17 03.0  
 W. Lng. 77 39 53.0  
 Protected  
 60 dBu

Channel = 225D  
 Max ERP = 0.25 kw  
 RCAMSL = 139 m  
 N. Lat. 35 29 14.0  
 W. Lng. 77 02 42.0  
 Interfering  
 40 dBu

Azimuth (degrees)	ERP (kw)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kw)	HAAT (m)	Dist (km)	Actual (dBu)	IX (km)
008.0	000.2500	0078.1	011.4	258.5	000.2500	0126.1	055.7	37.22	
009.0	000.2500	0078.7	011.5	258.5	000.2500	0126.1	055.5	37.30	
010.0	000.2500	0079.1	011.5	258.4	000.2500	0126.1	055.3	37.37	
011.0	000.2500	0079.5	011.5	258.4	000.2500	0126.1	055.1	37.45	
012.0	000.2500	0079.8	011.6	258.3	000.2500	0126.1	054.9	37.52	
013.0	000.2500	0079.9	011.6	258.2	000.2500	0126.1	054.7	37.60	
014.0	000.2500	0080.0	011.6	258.2	000.2500	0126.1	054.5	37.67	
015.0	000.2500	0080.2	011.6	258.1	000.2500	0126.1	054.3	37.74	
016.0	000.2500	0080.6	011.6	258.0	000.2500	0126.1	054.2	37.81	
017.0	000.2500	0080.8	011.6	257.9	000.2500	0126.1	054.0	37.89	
018.0	000.2500	0081.0	011.6	257.8	000.2500	0126.1	053.8	37.96	
019.0	000.2500	0081.2	011.7	257.7	000.2500	0126.1	053.6	38.03	
020.0	000.2500	0081.5	011.7	257.6	000.2500	0126.1	053.4	38.10	
021.0	000.2500	0081.8	011.7	257.5	000.2500	0126.1	053.2	38.17	
022.0	000.2500	0082.1	011.7	257.4	000.2500	0126.1	053.1	38.24	
023.0	000.2500	0082.2	011.7	257.3	000.2500	0126.1	052.9	38.30	
024.0	000.2500	0082.2	011.7	257.2	000.2500	0126.1	052.7	38.37	
025.0	000.2500	0081.8	011.7	257.0	000.2500	0126.1	052.6	38.42	
026.0	000.2500	0081.3	011.7	256.8	000.2500	0126.1	052.4	38.48	
027.0	000.2500	0081.0	011.6	256.7	000.2500	0126.1	052.3	38.53	
028.0	000.2500	0080.7	011.6	256.5	000.2500	0126.1	052.2	38.59	
029.0	000.2500	0080.6	011.6	256.3	000.2500	0126.1	052.0	38.64	
030.0	000.2500	0080.6	011.6	256.2	000.2500	0126.0	051.9	38.70	
031.0	000.2500	0080.9	011.6	256.1	000.2500	0126.0	051.7	38.76	
032.0	000.2500	0081.2	011.7	255.9	000.2500	0126.0	051.6	38.82	
033.0	000.2500	0081.5	011.7	255.8	000.2500	0126.0	051.4	38.88	
034.0	000.2500	0081.7	011.7	255.6	000.2500	0126.0	051.3	38.94	
035.0	000.2500	0081.9	011.7	255.4	000.2500	0126.0	051.1	38.99	
036.0	000.2500	0082.3	011.7	255.3	000.2500	0126.0	051.0	39.05	
037.0	000.2500	0082.7	011.8	255.1	000.2500	0126.0	050.8	39.11	
038.0	000.2500	0083.0	011.8	254.9	000.2500	0126.0	050.7	39.16	
039.0	000.2500	0083.1	011.8	254.8	000.2500	0126.0	050.5	39.21	
040.0	000.2500	0082.9	011.8	254.6	000.2500	0126.0	050.4	39.25	
041.0	000.2500	0082.6	011.7	254.3	000.2500	0126.0	050.3	39.29	
042.0	000.2500	0082.4	011.7	254.1	000.2500	0126.0	050.3	39.33	
043.0	000.2500	0082.3	011.7	253.9	000.2500	0125.9	050.1	39.37	
044.0	000.2500	0082.4	011.7	253.7	000.2500	0125.9	050.0	39.41	
045.0	000.2500	0082.4	011.7	253.5	000.2500	0125.9	049.9	39.45	
046.0	000.2500	0082.4	011.7	253.3	000.2500	0125.9	049.8	39.48	
047.0	000.2500	0082.5	011.7	253.1	000.2500	0125.9	049.8	39.52	
048.0	000.2500	0082.6	011.7	252.9	000.2500	0125.9	049.7	39.56	
049.0	000.2500	0082.7	011.7	252.7	000.2500	0125.9	049.6	39.59	
050.0	000.2500	0082.7	011.7	252.5	000.2500	0125.9	049.5	39.62	
051.0	000.2500	0082.7	011.8	252.3	000.2500	0125.9	049.4	39.65	
052.0	000.2500	0082.9	011.8	252.0	000.2500	0125.9	049.3	39.68	
053.0	000.2500	0083.1	011.8	251.8	000.2500	0125.9	049.3	39.71	
054.0	000.2500	0083.3	011.8	251.6	000.2500	0125.9	049.2	39.74	
055.0	000.2500	0083.4	011.8	251.4	000.2500	0125.9	049.1	39.77	
056.0	000.2500	0083.6	011.8	251.1	000.2500	0125.9	049.0	39.79	
057.0	000.2500	0083.7	011.8	250.9	000.2500	0125.8	049.0	39.82	
058.0	000.2500	0083.7	011.8	250.7	000.2500	0125.8	048.9	39.83	
059.0	000.2500	0083.7	011.8	250.4	000.2500	0125.8	048.9	39.85	
060.0	000.2500	0083.6	011.8	250.2	000.2500	0125.8	048.9	39.86	
061.0	000.2500	0083.6	011.8	250.0	000.2500	0125.8	048.8	39.87	
062.0	000.2500	0083.6	011.8	249.7	000.2500	0125.8	048.8	39.88	
063.0	000.2500	0083.7	011.8	249.5	000.2500	0125.8	048.8	39.89	
064.0	000.2500	0083.9	011.8	249.2	000.2500	0125.8	048.7	39.91	
065.0	000.2500	0084.1	011.8	249.0	000.2500	0125.8	048.7	39.92	

066.0	000.2500	0084.3	011.9	248.8	000.2500	0125.7	048.7	39.93
067.0	000.2500	0084.5	011.9	248.5	000.2500	0125.7	048.7	39.93
068.0	000.2500	0084.6	011.9	248.3	000.2500	0125.7	048.7	39.94
069.0	000.2500	0084.7	011.9	248.0	000.2500	0125.7	048.7	39.94
070.0	000.2500	0084.8	011.9	247.8	000.2500	0125.7	048.7	39.94
071.0	000.2500	0084.9	011.9	247.5	000.2500	0125.8	048.7	39.94
072.0	000.2500	0085.2	011.9	247.3	000.2500	0125.8	048.7	39.94
073.0	000.2500	0085.5	011.9	247.0	000.2500	0125.8	048.7	39.94
074.0	000.2500	0085.7	011.9	246.8	000.2500	0125.8	048.7	39.93
075.0	000.2500	0086.0	012.0	246.6	000.2500	0125.8	048.7	39.93
076.0	000.2500	0086.3	012.0	246.3	000.2500	0125.8	048.7	39.92
077.0	000.2500	0086.6	012.0	246.1	000.2500	0125.8	048.7	39.92
078.0	000.2500	0086.8	012.0	245.8	000.2500	0125.8	048.7	39.91
079.0	000.2500	0086.9	012.0	245.6	000.2500	0125.8	048.8	39.89
080.0	000.2500	0087.0	012.0	245.3	000.2500	0125.8	048.8	39.87
081.0	000.2500	0086.9	012.0	245.1	000.2500	0125.8	048.9	39.85
082.0	000.2500	0086.8	012.0	244.9	000.2500	0125.8	049.0	39.82
083.0	000.2500	0086.8	012.0	244.6	000.2500	0125.8	049.0	39.80
084.0	000.2500	0086.8	012.0	244.4	000.2500	0125.8	049.1	39.77
085.0	000.2500	0086.9	012.0	244.2	000.2500	0125.8	049.2	39.74
086.0	000.2500	0087.0	012.0	243.9	000.2500	0125.8	049.2	39.71
087.0	000.2500	0087.0	012.0	243.7	000.2500	0125.8	049.3	39.68
088.0	000.2500	0087.0	012.0	243.5	000.2500	0125.9	049.4	39.65
089.0	000.2500	0086.8	012.0	243.3	000.2500	0125.9	049.5	39.61
090.0	000.2500	0086.4	012.0	243.1	000.2500	0125.9	049.6	39.57
091.0	000.2500	0086.0	012.0	242.9	000.2500	0125.9	049.7	39.52
092.0	000.2500	0085.7	011.9	242.7	000.2500	0125.9	049.9	39.47
093.0	000.2500	0085.5	011.9	242.5	000.2500	0125.9	050.0	39.43
094.0	000.2500	0085.4	011.9	242.3	000.2500	0125.9	050.1	39.39
095.0	000.2500	0085.4	011.9	242.1	000.2500	0125.9	050.2	39.34
096.0	000.2500	0085.5	011.9	241.9	000.2500	0126.0	050.3	39.30
097.0	000.2500	0085.7	011.9	241.7	000.2500	0126.0	050.4	39.26
098.0	000.2500	0086.0	012.0	241.5	000.2500	0126.0	050.5	39.22
099.0	000.2500	0086.4	012.0	241.3	000.2500	0126.0	050.6	39.18
100.0	000.2500	0086.9	012.0	241.1	000.2500	0126.0	050.8	39.13
101.0	000.2500	0087.2	012.0	240.9	000.2500	0126.0	050.9	39.09
102.0	000.2500	0087.6	012.1	240.7	000.2500	0126.0	051.0	39.04
103.0	000.2500	0088.1	012.1	240.5	000.2500	0126.0	051.1	39.00
104.0	000.2500	0088.8	012.1	240.3	000.2500	0126.0	051.2	38.95
105.0	000.2500	0089.4	012.2	240.1	000.2500	0126.0	051.3	38.90
106.0	000.2500	0089.9	012.2	239.9	000.2500	0126.0	051.5	38.85
107.0	000.2500	0090.5	012.3	239.7	000.2500	0126.0	051.6	38.80
108.0	000.2500	0091.3	012.3	239.5	000.2500	0126.0	051.7	38.76
109.0	000.2500	0092.1	012.4	239.3	000.2500	0126.0	051.9	38.70
110.0	000.2500	0092.7	012.4	239.1	000.2500	0126.0	052.0	38.65
111.0	000.2500	0093.2	012.4	238.9	000.2500	0126.0	052.2	38.59
112.0	000.2500	0093.6	012.5	238.8	000.2500	0126.0	052.3	38.53
113.0	000.2500	0093.9	012.5	238.6	000.2500	0126.0	052.5	38.46
114.0	000.2500	0094.2	012.5	238.4	000.2500	0126.0	052.6	38.40
115.0	000.2500	0094.6	012.5	238.3	000.2500	0126.0	052.8	38.33
116.0	000.2500	0094.8	012.5	238.1	000.2500	0126.0	053.0	38.26
117.0	000.2500	0094.9	012.5	238.0	000.2500	0126.1	053.2	38.19
118.0	000.2500	0094.7	012.5	237.9	000.2500	0126.1	053.4	38.12
119.0	000.2500	0094.5	012.5	237.8	000.2500	0126.1	053.6	38.04
120.0	000.2500	0094.3	012.5	237.7	000.2500	0126.1	053.8	37.96
121.0	000.2500	0094.2	012.5	237.6	000.2500	0126.1	054.0	37.88
122.0	000.2500	0094.2	012.5	237.5	000.2500	0126.1	054.2	37.81
123.0	000.2500	0094.0	012.5	237.4	000.2500	0126.1	054.4	37.73
124.0	000.2500	0093.8	012.5	237.4	000.2500	0126.1	054.6	37.65
125.0	000.2500	0093.4	012.4	237.3	000.2500	0126.1	054.8	37.57
126.0	000.2500	0093.0	012.4	237.2	000.2500	0126.1	055.0	37.49
127.0	000.2500	0092.8	012.4	237.2	000.2500	0126.1	055.2	37.41



Antenna Mfg.: SWR  
Antenna Type: FMEC/2  
Station: NEW  
Frequency: 92.9  
Channel #: 225  
Figure: 2

Date: 11/1/2018

Beam Tilt	0	
Gain (Max)	0.991	-0.040 dB
Gain (Horizon)	0.991	-0.040 dB

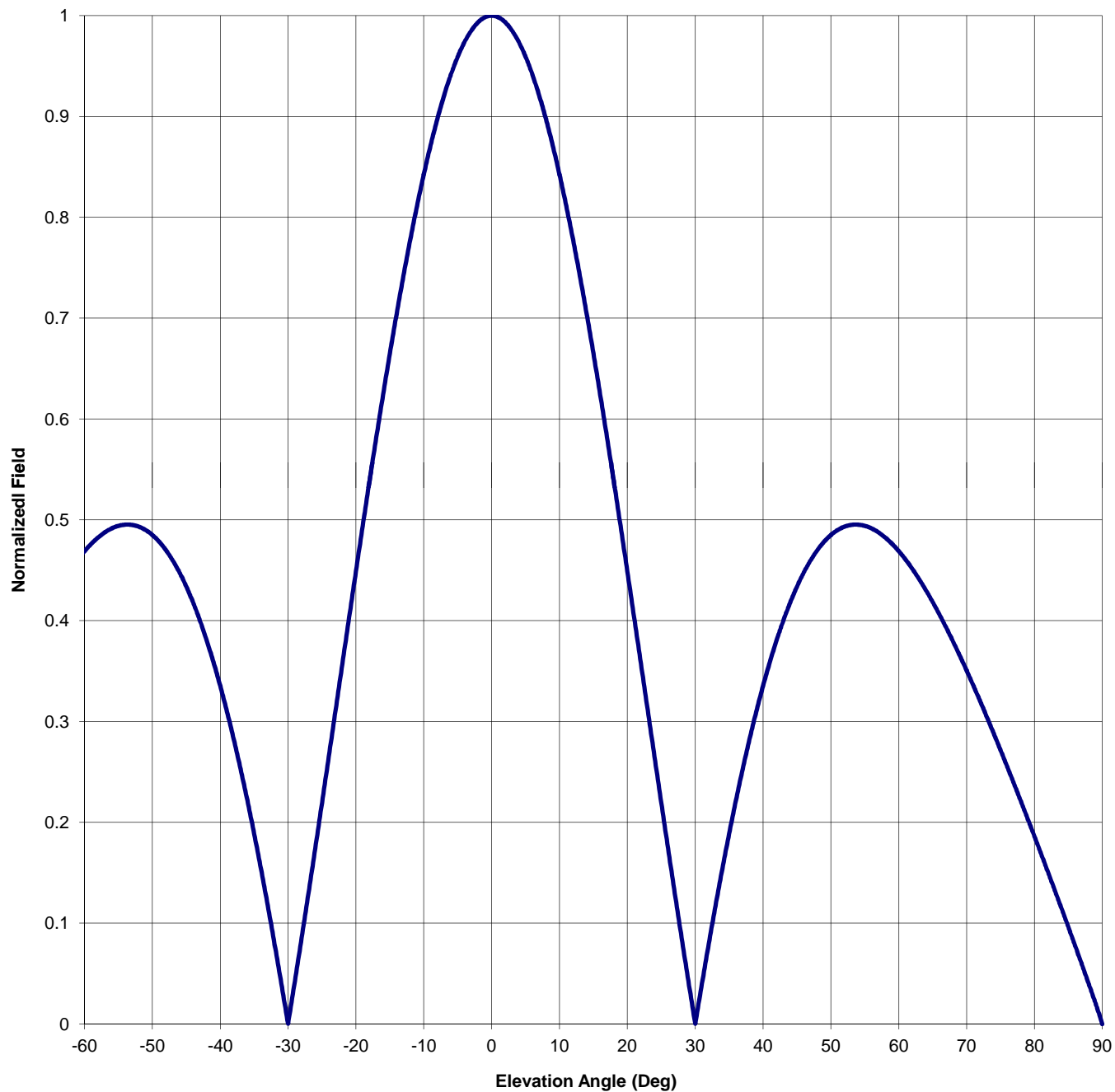


Figure 3: Allocation Study: W225CD  
CMG Coastal Carolina, LLC

FMCommander Single Allocation Study - 11-01-2018 - GLOBE 30 Sec  
1776771's Overlaps (In= 5.36 km, Out= 0.16 km)

1776771 CH 225 D  
Lat= 35 29 14.0, Lng= 77 02 42.0  
0.25 kW 130.5 m HAAT, 139 m COR  
Prot.= 60 dBu, Intef.= 40 dBu

W225CD CH 225 D BLFT20150114AAI  
Lat= 35 17 03.0, Lng= 77 39 53.0  
0.25 kW 0 m HAAT, 106 m COR  
Prot.= 60 dBu, Intef.= 40 dBu

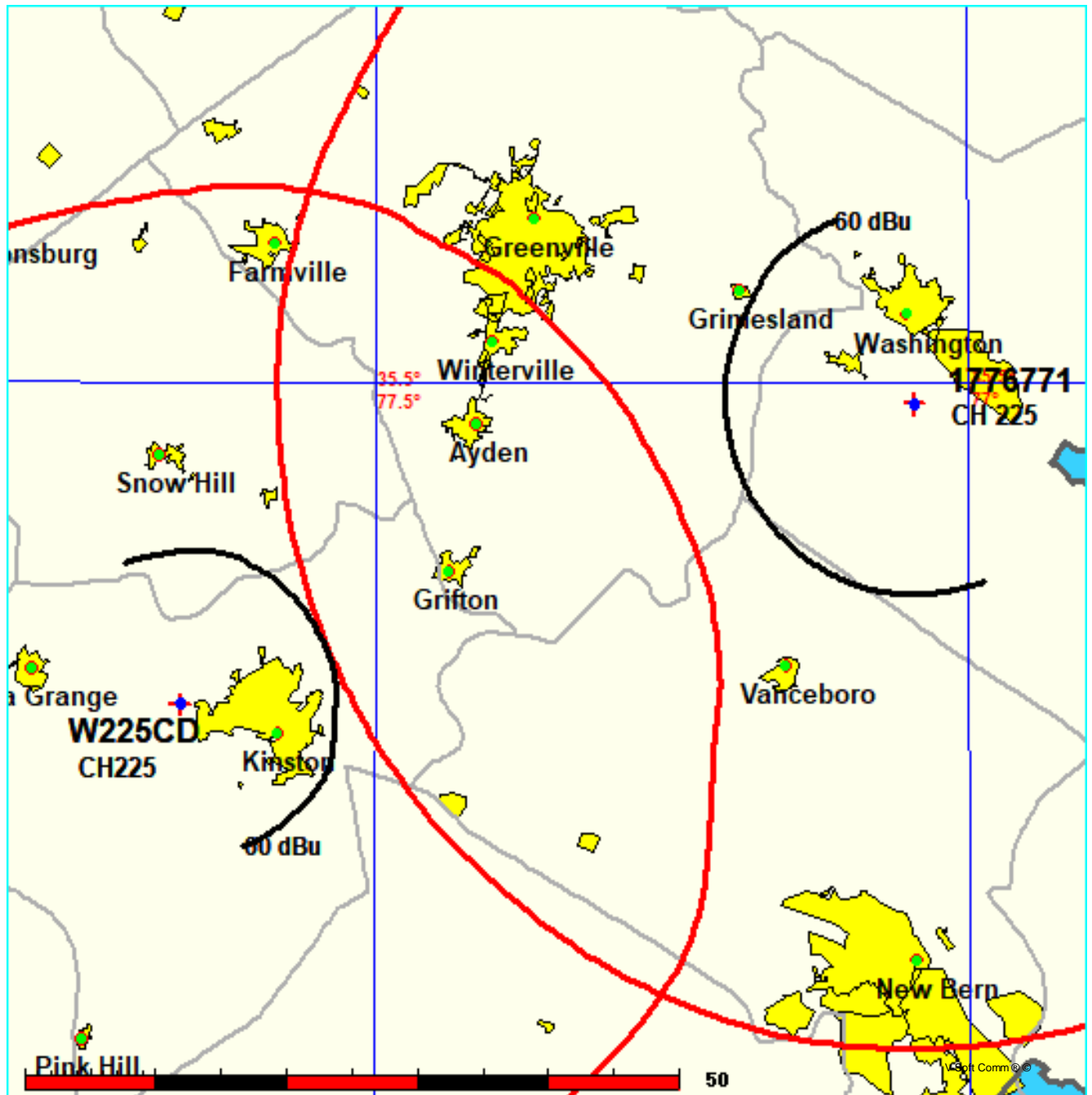
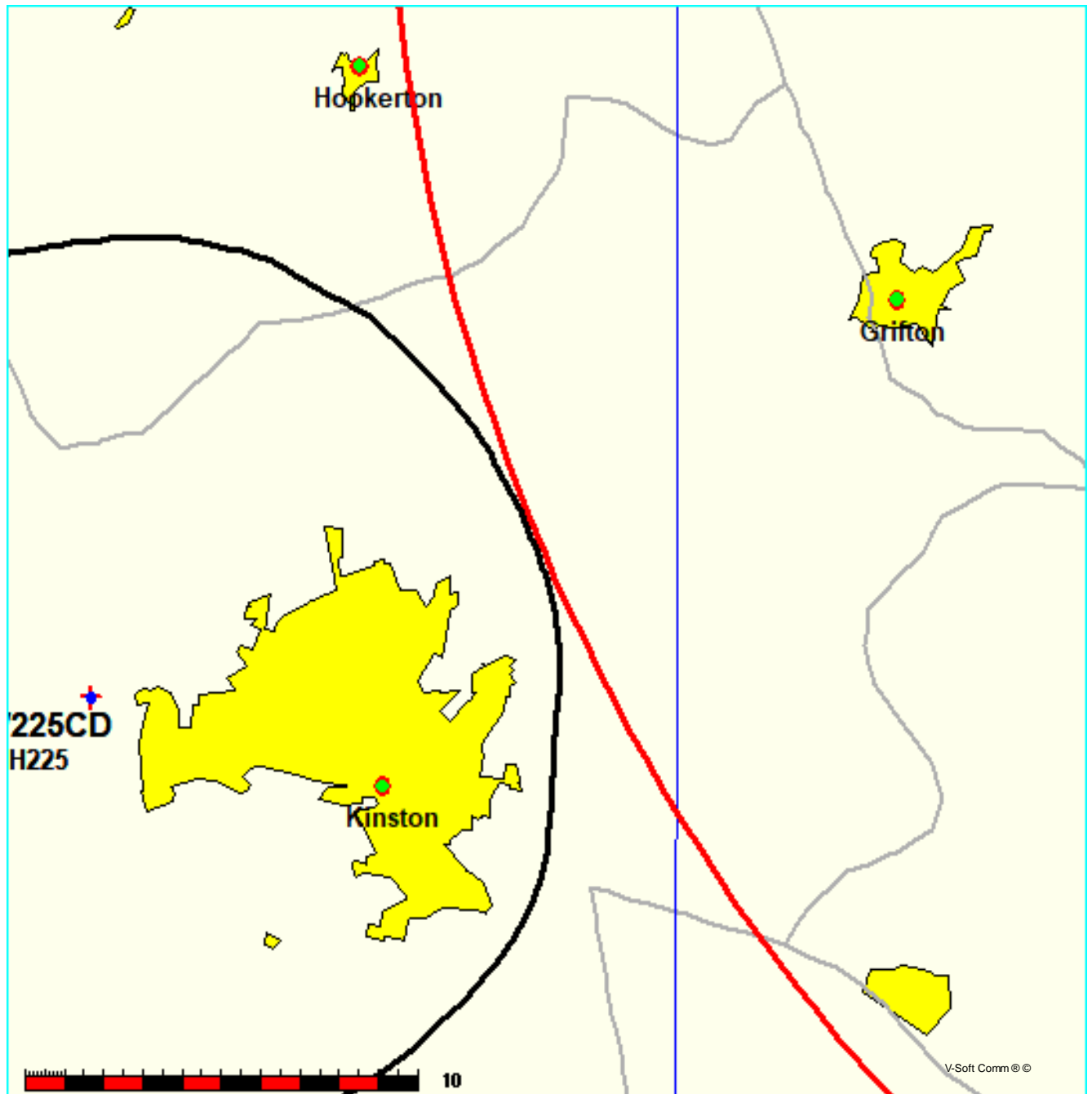


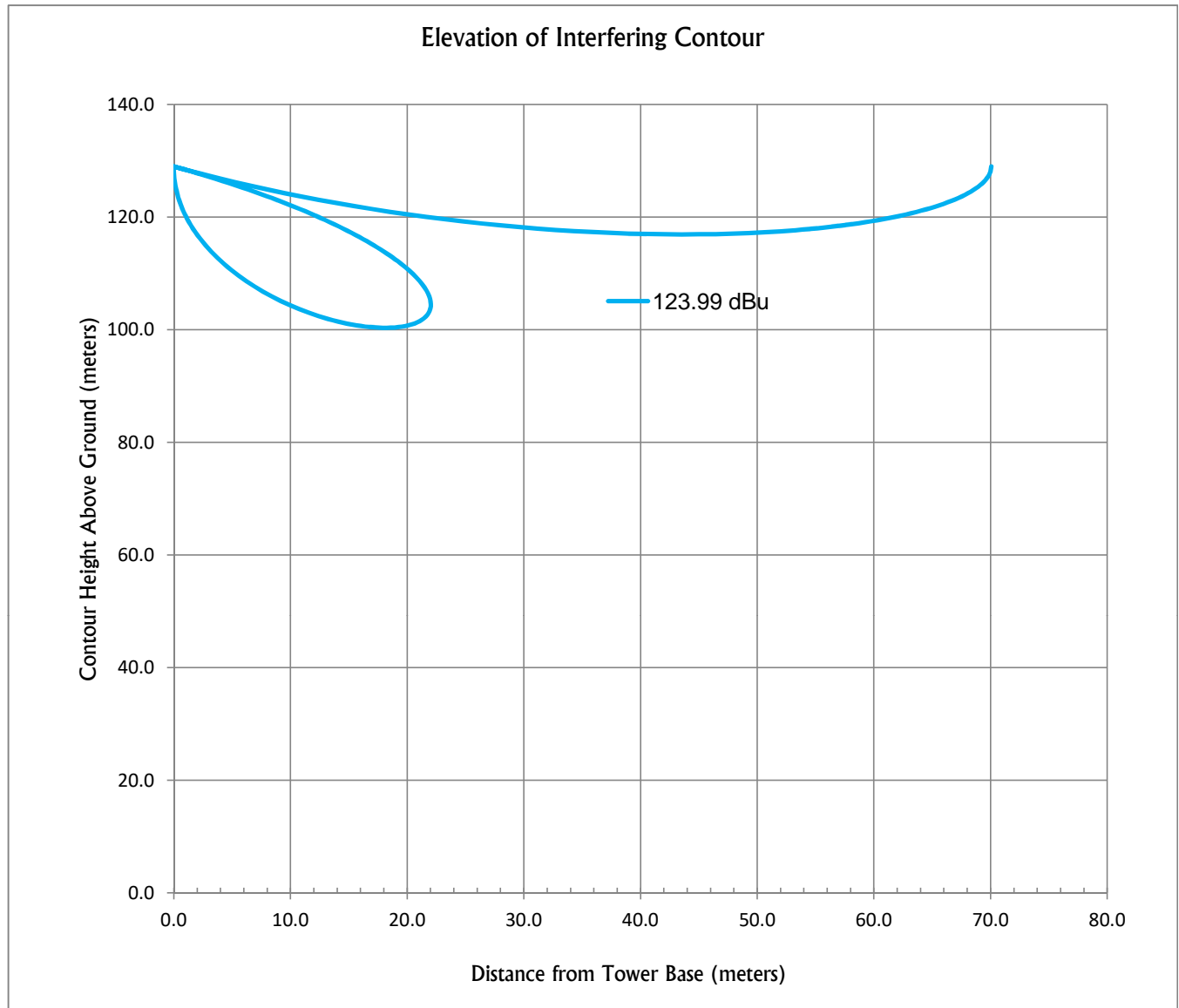
Figure 3A: Allocation Study: W225CD Detail  
CMG Coastal Carolina, LLC

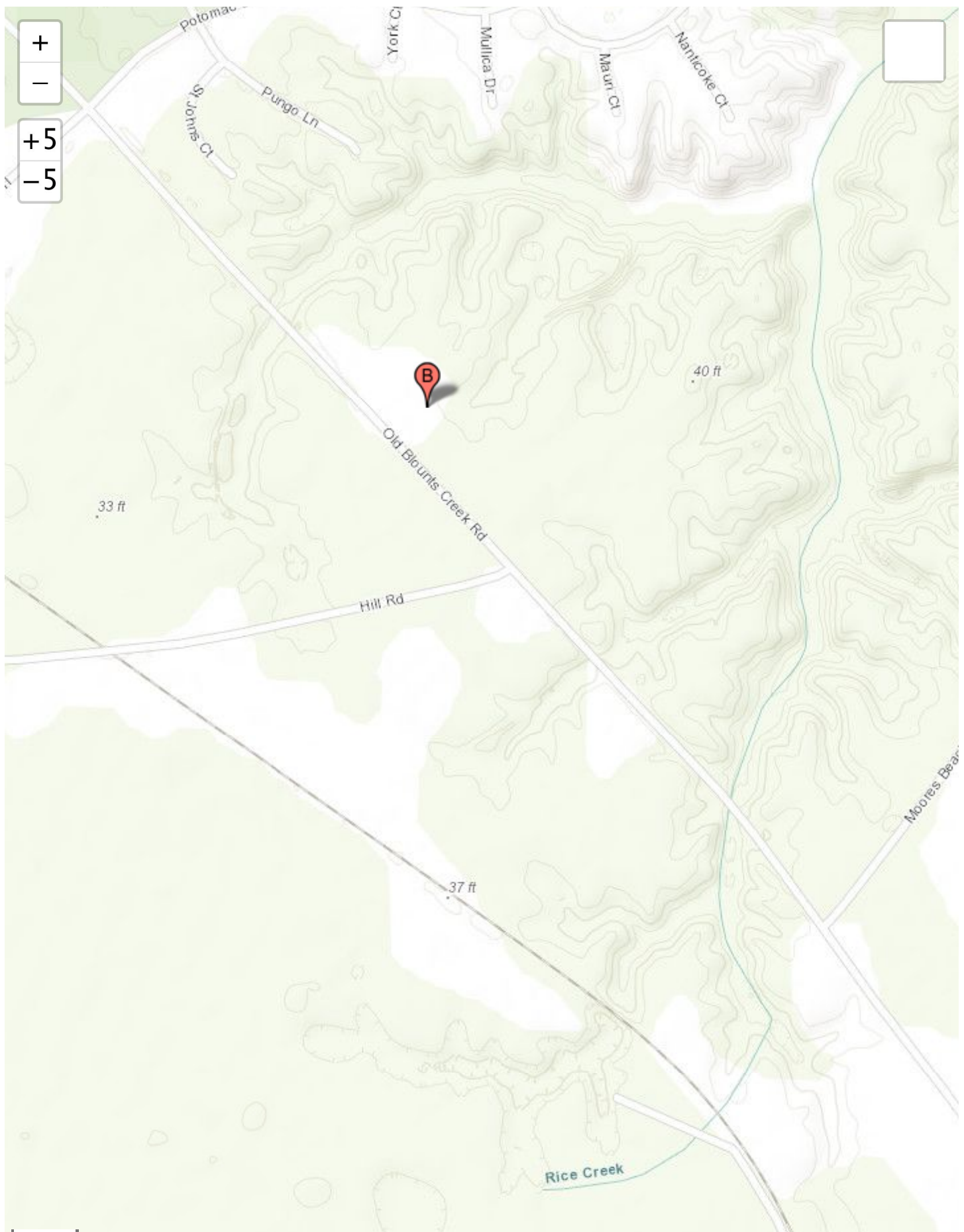
FMCommander Single Allocation Study - 11-01-2018 - GLOBE 30 Sec  
1776771's Overlaps (In= 5.36 km, Out= 0.16 km)

1776771 CH 225 D  
Lat= 35 29 14.0, Lng= 77 02 42.0  
0.25 kW 130.5 m HAAT, 139 m COR  
Prot.= 60 dBu, Intef.= 40 dBu

W225CD CH 225 D BLFT20150114AAI  
Lat= 35 17 03.0, Lng= 77 39 53.0  
0.25 kW 0 m HAAT, 106 m COR  
Prot.= 60 dBu, Intef.= 40 dBu









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# BNPFT-20180131ACA

Aerial Photograph with  
Interference Contours  
November 2018  
Figure 6

## Legend

-  1776771m (225)
-  1776771m (225) - 50 10 Field Strength: 123.99 dBu FCC [GLOBE 30]

