

**Television Channel 6 Protection for  
Reach Communications, Incorporated  
Regarding Facility ID 148289 Channel 203**

**Description of Exhibit 13 Contents**

This exhibit demonstrates that the proposed facility complies with Television Channel 6 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. § 74.1205. The applicant acknowledges that it will comply with 47 C.F.R. § 74.1203 in regards to resolving any interference that may occur.

**Compliance with 47 C.F.R. § 74.1205**

All authorized television channel 6 stations with which the proposed translator has contour overlap are tabulated below. Column eight show the station's effective radiating power. Column eleven show the distance between the proposed facility and the television station's transmission site.

<b>File Number</b>	<b>Callsign</b>	<b>Licensee</b>	<b>Cls</b>	<b>City</b>	<b>St</b>	<b>Sts</b>	<b>ERP</b>	<b>AMSL</b>	<b>Ch</b>	<b>Dist</b>
BLCT19870630KF	WCTV	GRAY TELEVISION LICENSEE, INC.	TV	THOMASVILLE	GA	LIC	97700	667	6	18.4

Page 2 of this exhibit is a letter from WCTV – Thomasville, GA, the station in the above table. The letter grants permission for Reach Communications to build the proposed facility.

The remaining pages of this exhibit contain a report compiled for WCTV by Cavell, Mertz & Davis on September 19, 2006.



A CBS Affiliate

Tallahassee • Thomasville  
An Operating Company of Gray Television, Inc.

1901 Halstead Boulevard  
Tallahassee, FL 32309

October 18, 2006

Ched Keiler - CPBE  
Chief Engineer  
Reach Communications  
Fort Lauderdale, Florida, USA

Dear Mr. Keiler,

WCTV grants permission for Reach Communications Incorporated / Edgewater Broadcasting ("Reach") to operate an FM translator W257BY, in Monicello, FL FAC# 148289 on channel 203 at power not to exceed 13 watts ERP using the vertical polarization and other specifications referred to in the attached report by Cavell, Mertz & Davis, Inc dated 9/19/06. Should any viewer of WCTV report to either party of this agreement a complaint related to interference of this facility with WCTV's broadcast, Reach at its own expense will install within ten days of such report a filter for such viewer that will eliminate the interference."

Sincerely,

K. Nick Waller  
President and General Manager

cc. Jim Killinger, Chief Engineer

Phone 850-907-2133 - Fax 850-893-5193 - [www.wctv6.com](http://www.wctv6.com)

-----Original Message-----

From: Dan Ryson [mailto:dryson@cmdconsulting.com]  
Sent: Tuesday, September 19, 2006 4:38 PM  
To: Jim Killinger  
Cc: Joseph M. Davis  
Subject: W257BY - WCTV Study

Mr. Killinger,

As requested, we have evaluated the proposed modification of unbuilt translator station W257BY (Monticello, FL) to change frequency to 88.5 MHz (FM Ch. 203). Because this frequency approaches that of the WCTV(TV) NTSC aural carrier and the proposed site location fails the contour overlap criteria specified in §74.1205 of the Rules, the FCC won't grant use of the facility without the written consent of WCTV. For guidance in interference evaluation, we referred to §73.525, the FCC Rule applicable to the evaluation of full-power, non-commercial FM stations in the proximity of a TV Channel 6 facility.

According to Reach Communications, the proposed W257BY facility will operate from a site along Highway 19, 2 miles south of Monticello, FL, with an effective radiated power ("ERP") of 13 Watts and a vertically polarized antenna centered 169 meters above mean sea level. The attached map shows the locations of interfering contours calculated for both a vertically polarized (as proposed) and a horizontally polarized translator facility. Because the FCC procedure includes a 40:1 cross-polarization benefit when a translator station utilizes vertical polarization only, the vertically polarized facility encompasses a very small area (0.13 square kilometers) with virtually no population. Conversely, a horizontally polarized facility is predicted to encompass over 5 square kilometers and include a population of 156 persons.

The locations of Census 2000 "Population Blocks" are also depicted on the map. Although their locations track with residential clusters, actual residences and other settlements are distributed along Highway 19 near the proposed site.

Please feel free to contact Joe Davis or myself with any questions or concerns.

Cordially,

--

Dan Ryson  
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