

EXHIBIT 13

Interference Considerations

Introduction

This application is for modification of the facilities of an FM translator under the “250-mile window application” procedure set forth in the Commission’s AM Revitalization proceeding, MB Docket No. 13-249. The application requests a change in the location of the transmitting facilities for the modified translator, and operation on Channel 269D with 170 watts effective radiated power and employing a nondirectional antenna, to provide fill-in service for AM Station WFAT, Orange-Athol, Massachusetts.

The geographical coordinates (NAD27) of the proposed FM translator site are as follows:

North latitude 42° 35’ 38”

West longitude 72° 12’ 02”.

At this location the ground elevation is 344 meters above mean sea level.

The proposed operation of the modified translator conforms with the requirements of Section 74.1204 of the Commission’s Rules for a Class D station on Channel 269 with respect to overlap of predicted contours with the licensed operation of any FM station, LPFM station or FM translator, and the operation of any such facilities specified in a construction permit or pending application, on the same channel and on the first, second and third adjacent channels, as shown in this Exhibit. Additionally, the location of the proposed translator complies with the intermediate frequency distance separation requirements set forth in the Rules. The proposed operation of the translator therefore would not result in objectionable interference to any station.

Allocation Study

The FM stations and FM translator taken into account in the allocation study for this application are listed in Table A of this Exhibit.

Figure 1 of this Exhibit shows the pertinent predicted contours for the proposed translator and co-channel Class A station WBRK-FM, Pittsfield; Class B1 station WBWL(FM), Lynn; and the authorized operation of a new LPFM station at Springfield, all in Massachusetts.

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The pertinent predicted contours for the proposed translator and first adjacent channel stations WRSY(FM), Marlboro, Vermont, on Channel 268A; and WKKN(FM), Westminster, Vermont, on Channel 270A, are shown in Figure 2A of this Exhibit. WKKN(FM) also holds a construction permit for operation on Channel 270A, and Figure 2B of this Exhibit shows the contours for the proposed translator and the authorized WKKN(FM) facilities.

Figure 3 of this Exhibit depicts the pertinent predicted contours for the proposed translator and the nearby FM stations on the second and third adjacent channels. Shown are the contours for second adjacent channel station WAQY(FM), Springfield, Massachusetts, on Channel 271B; and for third adjacent channel station WGIR(FM), Manchester, New Hampshire, on Channel 266B.

On the frequencies 53 and 54 channels removed from Channel 269, the only FM stations or FM translator within 50 kilometers of the proposed modified translator are WKMY(FM), Winchendon, Massachusetts; and WMUA(FM), Amherst, Massachusetts, both on Channel 216A. WKMY(FM) is located 18 kilometers from the proposed site, and WMUA(FM) is located 35 kilometers from the proposed site, both more than the minimum required intermediate frequency spacing of 10 kilometers from an FM translator to a Class A station.

The site for the proposed modified translator is located within 320 kilometers of the Canadian border. With respect to the requirements of Section 74.1235(d) of the Commission's Rules, the 34 dBu F(50,10) contour for the proposed translator operation would not extend to more than 60 kilometers in any direction toward the nearby part of the U.S.-Canada border, and as shown in Figure 1 of this Exhibit, the contour would not extend across the U.S.-Canada border.

The predicted contours shown in this Exhibit were determined in accordance with the requirements of Section 73.313 of the Commission's Rules, from computerized calculations based on the NGDC 30-second terrain database, and Figures 1 and 1a of Section 73.333 of the Rules. Distances to the contours were calculated at azimuthal increments of one degree.

Fred W. Volken
Engineering Consultant

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Sierra Madre, California

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TABLE A

Station Facilities

	Channel and Class	Station and Location, Status, File Number	Geographical Coordinates	Facilities	
				Effective Radiated Power and Antenna	Antenna Height Above Average Terrain (meters)
Co-Channel Stations	269D	Proposed Modified Translator, Athol, MA	N 42° 35' 38" W 71° 02' 56"	0.170 kW Nonirectional	-----
	269A	WBRK-FM, Pittsfield, MA License BMLH-20080131AKI	N 42° 28' 31" W 73° 16' 07"	3.0 kW Nondirectional	44
	269B1	WBWL(FM), Lynn, MA License BLH-20150803ABJ	N 42° 25' 51.7" W 71° 05' 18.8"	13.5 kW Nondirectional	138
	269L1	New LPFM, Springfield, MA Construction permit BNPL-20131115ACG	N 42° 07' 24" W 72° 32' 54"	0.10 kW Nondirectional	30
First Adjacent Channel Stations	268A	WRSY(FM), Marlboro, VT License BLH-19960830KA	N 42° 50' 46" W 72° 41' 16"	0.12 kW Nondirectional	227
	270A	WKKN(FM), Westminster, VT License BLH-20080409AAH	N 42° 02' 00.0" W 72° 22' 03.7"	1.05 kW Directional	236
	270A	WKKN(FM), Westminster, VT Construction permit BPH-20120625ACL	N 42° 08' 14" W 72° 25' 59"	3.9 kW Nondirectional	124

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TABLE A (continued)

Station Facilities

	Channel and Class	Station and Location, Status, File Number	Geographical Coordinates	Facilities	
				Effective Radiated Power and Antenna	Antenna Height Above Average Terrain (meters)
Second and Third Adjacent Channel Stations	266B	WGIR-FM, Manchester, NH License BLH-19910718KC	N 42° 58' 54" W 71° 35' 21"	11.5 kW Nondirectional	313
	271B	WAQY(FM), Springfield, MA License BMLH-19930514KA	N 42° 05' 00" W 72° 42' 16"	17.0 kW Nondirectional	238
Intermediate Frequency Stations	216A	WKMY(FM), Winchendon, MA License BLED-20060302ACZ	N 42° 42' 09" W 72° 02' 18"	0.06 kW Nondirectional	137.3
	216A	WMUA(FM), Amherst, MA License BLED-20031110ACU	N 42° 23' 37" W 72° 31' 21"	0.45 kW Nondirectional	39

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FIGURE 2A

First Adjacent Channel
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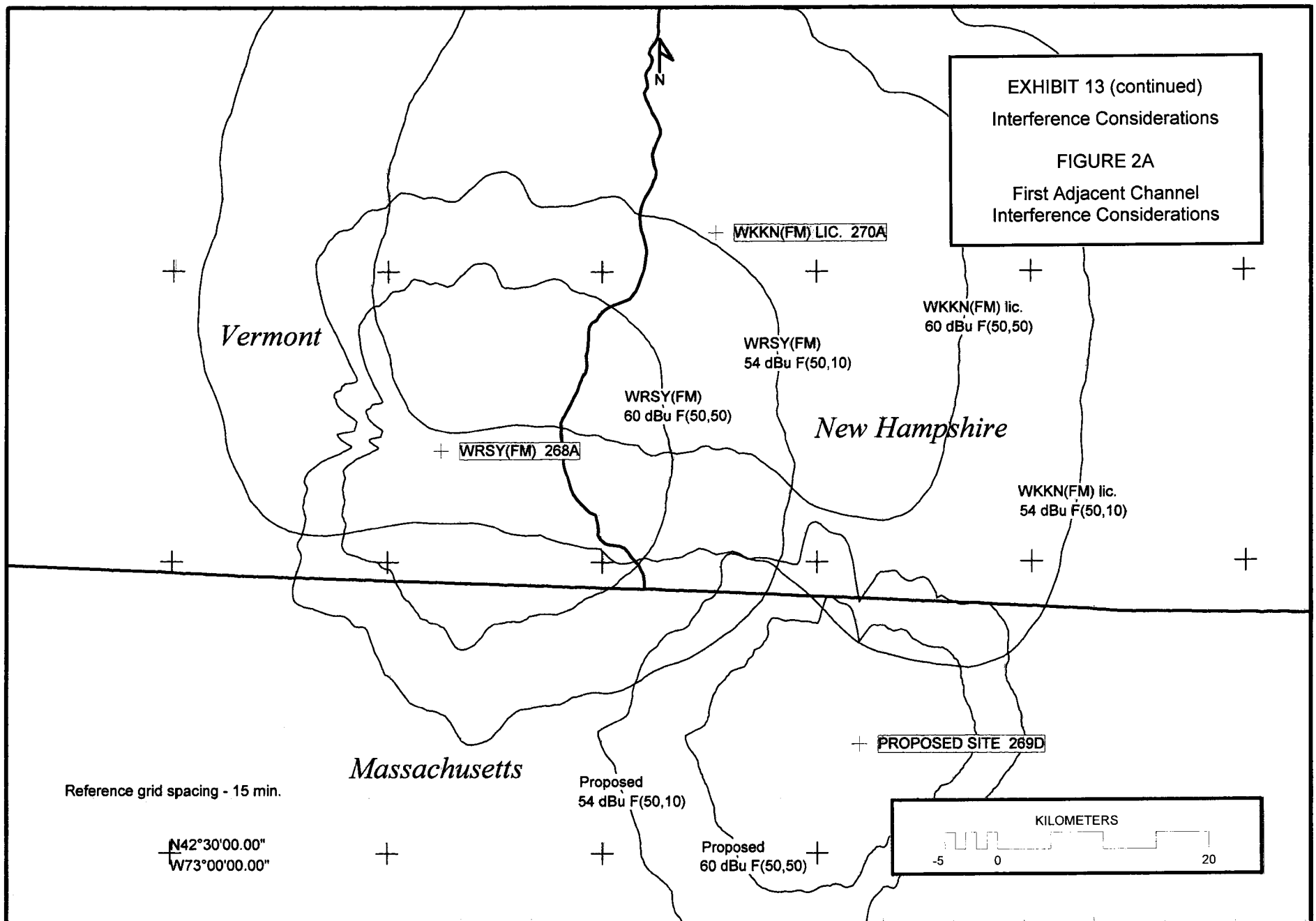


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FIGURE 2B
First Adjacent Channel
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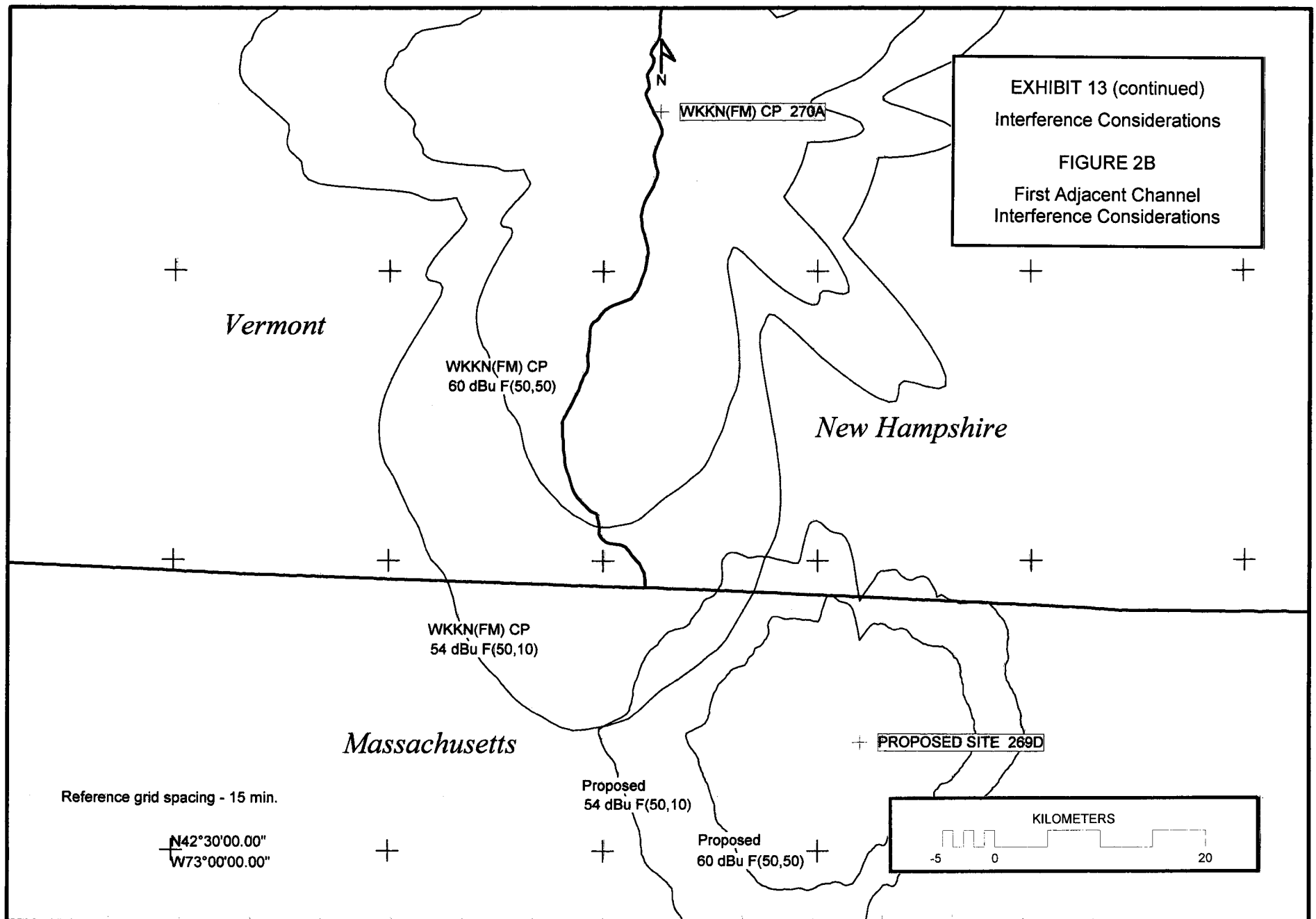


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FIGURE 3
Second and Third Adjacent
Channel Interference
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