

**Non-Interference Compliance for
We Count, Inc**
Regarding Facility ID 196349 Channel 249

Description of Exhibit 11 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. § 73.807. The applicant acknowledges that it will comply with 47 C.F.R. § 73.827(a) in regards to resolving any interference that may occur. The applicant acknowledges further acknowledges that it will operate 47 C.F.R. § 73.811 and all other applicable FCC rules and regulations.

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), applicable sections of Part 73 that apply to LPFMs and the instructions for this form 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 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Page 4 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 dB μ 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.

Compliance with 47 C.F.R. § 74.1204(d) and Demonstration of no LPFM Interference to Second Adjacent Channels - Waiver

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
	BLH-20050224ABL	WFLC	64.65	64.28

Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour:
64.28 dBμ.¹

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 **64.28 dBμ**, this makes the proposed translator's worst-case interfering contour **104.28 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **191.59 m** from the transmit antenna.

The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated on the following page at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free-space calculation that neglects any loss due to reflection, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the ground level by **8.87 m** from the tower. The applicant has taken into account USGS quadrangles and relevant aerial photography instating that no structures, except possibly tower support structures, puncture the area of interference. Hence, in accordance with 47 C.F.R. § 74.1204(d), and applicable sections of § 73.800 concerning LPFM rules and regulations, 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 47, C.F.R. § 73.807, applicable sections of § 73.800 concerning LPFM rules and regulations, and the LPFM rules concerning second adjacent channel waiver request.

Antenna Manufacturer: NICOM
Antenna Model: BKG77 1 / 2 .75 Space
CORAGL: 44 m
Maximum ERP: 0.020² kW
Interfering Contour: 104.28 dBμ
Max Int. Contour Distance: 191.59 m
Ground Clearance: 8.87 m

¹ This LPFM analysis was based on an ERP of 20 watts based on .75 wavelength space.

² Id 1

NICOM BKG77 2 bay Depression Propagation below horizontal - Variable Wavelength - OEM Data

Depress Ang	Rel Field P	ERP (watts)	Dist to interfering contour (m)	Horz. Dist to contour from tower (m)	Vert Clearance of Interfering Contour (m)
0	1.000	20.00	191.59	191.59	44.00
5	0.976	18.67	185.10	184.39	27.87
10	0.897	14.95	165.66	163.14	15.23
15	0.759	9.96	135.22	130.61	9.00
20	0.627	5.75	102.70	96.51	8.87
25	0.465	2.53	68.13	61.74	15.21
30	0.319	0.80	38.26	33.14	24.87
35	0.220	0.15	16.38	13.42	34.61
40	0.141	0.00	1.14	0.88	43.26
45	0.075	0.03	7.28	5.15	38.85
50	0.035	0.05	10.03	6.45	36.31
55	0.017	0.05	10.02	5.75	35.79
60	0.006	0.03	7.57	3.79	37.44
65	0.002	0.01	5.24	2.22	39.25
70	0.000	0.00	2.72	0.93	41.44
75	0.000	0.00	1.33	0.34	42.72
80	0.000	0.00	0.42	0.07	43.59
85	0.000	0.00	0.14	0.01	43.86
90	0.000	0.00	0.00	0.00	44.00

Facility ID	File Number	Callsign	Licensee	Sts	City	St	Cls	ERP	AMSL	Ch	Adj	Dist
37253	BLH-19920311KD	WRTO-FM	LICENSE CORPORATION #2	LIC	GOULDS	FL	C0	100000	429	252	3	7.65
72984	BLH-20050224ABL BPFT-	WFLC	COX RADIO, INC.	LIC	MIAMI	FL	C	98000	308	247	-2	61.16
138466	20161013ABG BXLH-	W298AM	REACH COMMUNICATIONS, INC.	CP	MIAMI	FL	D	99	185	249	0	44.3
72984	20041229AAU BXPB-	WFLC	COX RADIO, INC.	LIC	MIAMI	FL	C	66540	215	247	-2	61.16
72984	20150917ACZ	WFLC	COX RADIO, INC.	CP	MIAMI	FL	C	20000	311	247	-2	60.16
20436	BLH-20151123BYT	WRMF	ALPHA MEDIA LICENSEE LLC	LIC	PALM BEACH	FL	C	100000	417	250	1	124.49
20436	BLH-19850806KQ	WRMF	ALPHA MEDIA LICENSEE LLC	LIC	PALM BEACH	FL	C	100000	412	250	1	124.72
23294	BLH-20040121ACE BXLH-	WAVK	FLORIDA KEYS MEDIA, LLC	LIC	MARATHON	FL	C2	50000	66.2	249	0	91.14
20436	20151028AAM BXLH-	WRMF	ALPHA MEDIA LICENSEE LLC	LIC	PALM BEACH	FL	C	100000	393	250	1	124.49
20436	20040615ABN BPH-	WRMF	ALPHA MEDIA LICENSEE LLC	LIC	PALM BEACH	FL	C	100000	267.7	250	1	126.62
23294	20130718AAM	WAVK	FLORIDA KEYS MEDIA, LLC	CP	MARATHON	FL	C1	100000	138	249	0	130.73
20436	BLH-19970625KA	WRMF	ALPHA MEDIA LICENSEE LLC	LIC	PALM BEACH	FL	C	100000	132	250	1	146.5
28901	BLH-20000120ABH BXLH-	WTLQ-FM	FORT MYERS BROADCASTING COMPANY	LIC	PUNTA RASSA	FL	C3	14500	131	249	0	183.9
28901	20151117AAM BXLH-	WTLQ-FM	FORT MYERS BROADCASTING COMPANY	LIC	PUNTA RASSA	FL	C3	8200	103	249	0	183.9
20436	20130827ADY BLFT-	WRMF	ALPHA MEDIA LICENSEE LLC	LIC	PALM BEACH	FL	C	23700	109	250	1	152.54
151917	20160413AEE BXPB-	W280EY	WSOS RADIO LLC	LIC	ST. AUGUSTINE	FL	D	240	125	280	31	42.05
65020	20140508AAZ	WQGA	AMFM RADIO LICENSES, L.L.C.	CP	WAYCROSS JACKSONVILLE BEACH	GA	C0	370	110	277	28	123.94
22005	BLH-20110614AAI BNPFT-	WJXL-FM	RIVER CITY BROADCASTING, LLC CENTRAL FLORIDA EDUCATIONAL FOUNDATION, INC.	LIC	BEACH	FL	A	1700	197.1	223	-26	31.25
157073	20130823AAY	W278BP		CP	PALM COAST	FL	D	99	38	278	29	80.72
133271	BLL-20091118AFW BMLL-	WFJV-LP	WFJV COMMUNITY RADIO GROUP	LIC	CITRONELLE	FL	LP100	46	56.19	277	28	143.51
133271	20151124CCZ BNPFT-	WFJV-LP	WFJV COMMUNITY RADIO GROUP	LIC	CITRONELLE	FL	LP100	46	56.19	277	28	143.51
147176	20130830ASW BLFT-	W276CQ	RADIO TRAINING NETWORK, INC.	CP	WILLISTON	FL	D	27	100	276	27	103.36
149342	20151028AAB BPFT-	W274BT	EDGEWATER BROADCASTING, INC.	LIC	WILLISTON	FL	D	205	185	274	25	71.02
149342	20151030AAA BSTA-	W274BT	EDGEWATER BROADCASTING, INC.	CP	WILLISTON	FL	D	205	185	274	25	71.02
66575	20160104AMQ	WRUF-FM	THE UNIVERSITY OF FLORIDA	APP	GAINESVILLE	FL	C1	523	140.2	279	30	77.31
25403	BLH-20090317ACS BLFT-	WOTW	JVC MEDIA OF FLORIDA, LLC	LIC	WINDERMERE	FL	C2	22000	259	276	27	168.82
143943	20070220AAO	DW277AN	ACE OF HEARTS DISC JOCKEY SERVICE INC.	LIC	CAPE CANAVERAL	FL	D	41	49	277	28	219.73

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