

Exhibit 13 Page 1
VCY America, Inc.
Identification of Facilities
Oshkosh, WI

CALL FORMAT LATITUDE	ST	CITY ARN LONGITUDE	FREQ OWNER HAAT:m AMSL:m	CHN	CL	ERP	STAT
Proposed			99.90000		D	250.00	APP
Unknown or New CP							
44-04-53.1	N	88-33-52.6 W	100.520 337.000				
WPKR	WI	OMRO	99.50000		C2	25000.00	LIC
Unknown or New CP		BLH-20040123BEI	CUMULUS				LICENSING LLC
43-49-44.0	N	88-40-06.0 W	117.508 423.000				
WNCY-FM	WI	NEENAH-MENASHA	100.30000		C2	45000.00	LIC
Unknown or New CP		BLH-19950526KB	MIDWEST COMMUNICATIONS, INC.				
44-15-27.0	N	88-11-41.0 W	112.074 377.000				
WSAU-FM	WI	RUDOLPH	99.90000		C3	13000.00	LIC
Unknown or New CP		BLH-19960415KE	WRIG, INC				
44-20-19.0	N	89-38-55.0 W	97.800 459.000				
WDKF	WI	STURGEON BAY	99.70000		C2	46000.00	LIC
Unknown or New CP		BLH-19910211KD	MIDWEST COMMUNICATIONS INC				
44-38-08.0	N	87-37-37.0 W	126.760 373.000				
WJVL	WI	JANESVILLE	99.90000		B1	11000.00	LIC
Unknown or New CP		BLH-19891018KB	SOUTHERN WISCONSIN BROADCASTING, L.L.C.				
42-43-47.0	N	89-10-10.0 W	117.034 427.000				
WSJP-FM	WI	PORT WASHINGTON	100.10000		A	6000.00	LIC
Unknown or New CP		BLH-19970624KC	STARBOARD MEDIA FOUNDATION, INC.				
43-25-14.0	N	87-59-40.0 W	72.382 349.000				
WOWN	WI	SHAWANO	99.30000		C3	14000.00	LIC
Unknown or New CP		BLH-19930726KZ	RESULTS BROADCASTING INC.				
44-45-14.0	N	88-20-01.0 W	104.185 390.000				
WDDC	WI	PORTAGE	100.10000		A	3100.00	LIC
Unknown or New CP		BLH-19990329KG	MAGNUM COMMUNICATIONS, INC.				
43-31-42.0	N	89-26-01.0 W	77.369 367.000				
W260CV	WI	RACINE	99.90000		D	250.00	LIC
Unknown or New CP		BLFT-20160817AAN	DAVID R. MAGNUM				
42-42-38.0	N	87-49-49.0 W	76.906 306.000				
W259BC	WI	BARABOO	99.70000		D	250.00	LIC
Unknown or New CP		BLFT-20160819AAX	BARABOO BROADCASTING CORPORATION				
43-25-50.0	N	89-39-13.0 W	228.694 556.000				

Exhibit 13 Page 2

VCY America, Inc.

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Oshkosh, WI

W259AO	WI	SAUKVILLE	99.70000	D	10.00	LIC
Unknown or New CP BLFT-20130702ABZ TOMSUN MEDIA, LLC						
43-22-36.0	N	87-59-15.0	W	6.340	278.000	
WFEL-LP	IL	ANTIOCH	99.90000	LP100	49.00	LIC
Unknown or New CP BLL-20041213AAG FAITH EVANGELICAL LUTHERAN CHURCH						
42-29-25.0	N	88-06-25.0	W	9.213	280.000	
WFEL-LP	IL	ANTIOCH	99.90000	LP100	100.00	CP
Unknown or New CP BPL-20160421AFI FAITH EVANGELICAL LUTHERAN CHURCH						
42-29-23.0	N	88-06-40.0	W	1.684	273.000	
	MI	CUSTER	99.90000	A	0.00	APP
Unknown or New CP FM ALLOTMENT-RM-11689						
43-58-16.0	N	86-19-42.0	W	-19.347	212.000	
WDTX	WI	ROTHSCHILD	100.50000	C3	25000.00	LIC
Unknown or New CP BLH-20100125AAO SUNRISE BROADCASTING LLC.						
44-50-13.0	N	89-45-57.0	W	40.149	461.000	
W260BL	IL	WAUKEGAN	99.90000	D	10.00	LIC
Unknown or New CP BLFT-20071026ACO CALVARY RADIO NETWORK, INC.						
42-19-44.0	N	87-54-38.0	W	63.752	303.000	
WYML-LP	IL	INGLESIDE	99.90000	LP100	100.00	LIC
Unknown or New CP BLL-20160119AAH LOCAL COMMUNITY BROADCASTING INC						
42-17-04.6	N	88-15-42.8	W	-42.130	244.200	
WQLQ	MI	BENTON HARBOR	99.90000	B	50000.00	LIC
Unknown or New CP BLH-19990210KC WSJM, INC.						
41-57-42.0	N	86-21-02.0	W	96.480	337.000	
W263BQ	WI	SHEBOYGAN	100.50000	D	150.00	LIC
Unknown or New CP BLFT-20121203ACC WRVM, INC.						
43-45-56.0	N	87-45-59.0	W	34.854	266.000	
WRHN	WI	RHINELANDER	100.10000	C1	100000.00	LIC
Unknown or New CP BMLH-20131230AMA NRG LICENSE SUB, LLC						
45-37-42.0	N	89-23-38.0	W	23.892	575.000	
WPNE	WI	GREEN BAY	89.30000	C1	97000.00	LIC
Unknown or New CP BLED-20030815ADO STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BOARD						
44-24-35.0	N	88-00-06.0	W	256.181	513.000	
WIWI-LP	WI	MILWAUKEE	99.70000	LP100	100.00	LIC
Unknown or New CP BLL-20170103AAI MILWAUKEE HISPANIC RADIO, INC.						
43-01-28.4	N	87-55-36.3	W	-26.333	208.000	

Exhibit 13 Page 3
VCY America, Inc.
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Oshkosh, WI

WCPQ IL PARK FOREST 99.90000 B 50000.00 LIC
Unknown or New CP BMLH-20010511ABE WCLR, INC.
41-18-04.0 N 87-49-35.0 W 125.847 359.000

WDRK WI CORNELL 99.90000 C3 25000.00 LIC
Unknown or New CP BMLD-20170317AAP BLUGOLD RADIO LLC
45-07-22.0 N 91-24-23.0 W 48.165 422.000

WWIS-FM WI BLACK RIVER FALLS 99.70000 C3 25000.00 LIC
Unknown or New CP BLH-19910516KD WWIS RADIO, INC.
44-19-11.0 N 90-53-31.0 W 52.006 387.000

Exhibit 13 Page 4
VCY America, Inc.
Interference Area
Oshkosh, WI

The proposed translator will broadcast on 260, which is within the 60 dBμ contour of second adjacent station WPKR on channel 258, Fac ID 42093 and the 60 dBμ contour of second adjacent station WNCY-FM on channel 262, Fac ID 9965. WPKR's interfering contour at the translator site is 69.4 dBμ F(50,50) and WNCY-FM's interfering contour at the translator site is 67.7 dBμ F(50,50). Using the ratio of 100:1 (translator to WPKR and WNCY-fm) on the second adjacent channels, the population within the proposed translator 107.7 dBμ contour is 0 (zero). Applying the antenna manufacturer's vertical radiation pattern the area of interference is able to be more accurately calculated geometrically than just by using the free space equation alone. This particular antenna is a two bay Nicom BKG77. It was determined from the manufacturer's vertical plan that from 50 to 65 degrees below horizontal the interference area would reach the ground and extend 98.3 meters horizontally. We have proposed the antenna radiation center will be 109 meters above ground with an Effective Radiated Power of 250 watts. There are no occupied structures or elevated roadways within the interference area of the translator.

Therefore, the application is in compliance with the following: §74.1204 (d) "The provisions of this section concerning prohibited overlap will not apply where the area of such overlap lies entirely over water. In addition, an 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."

Allocation Study

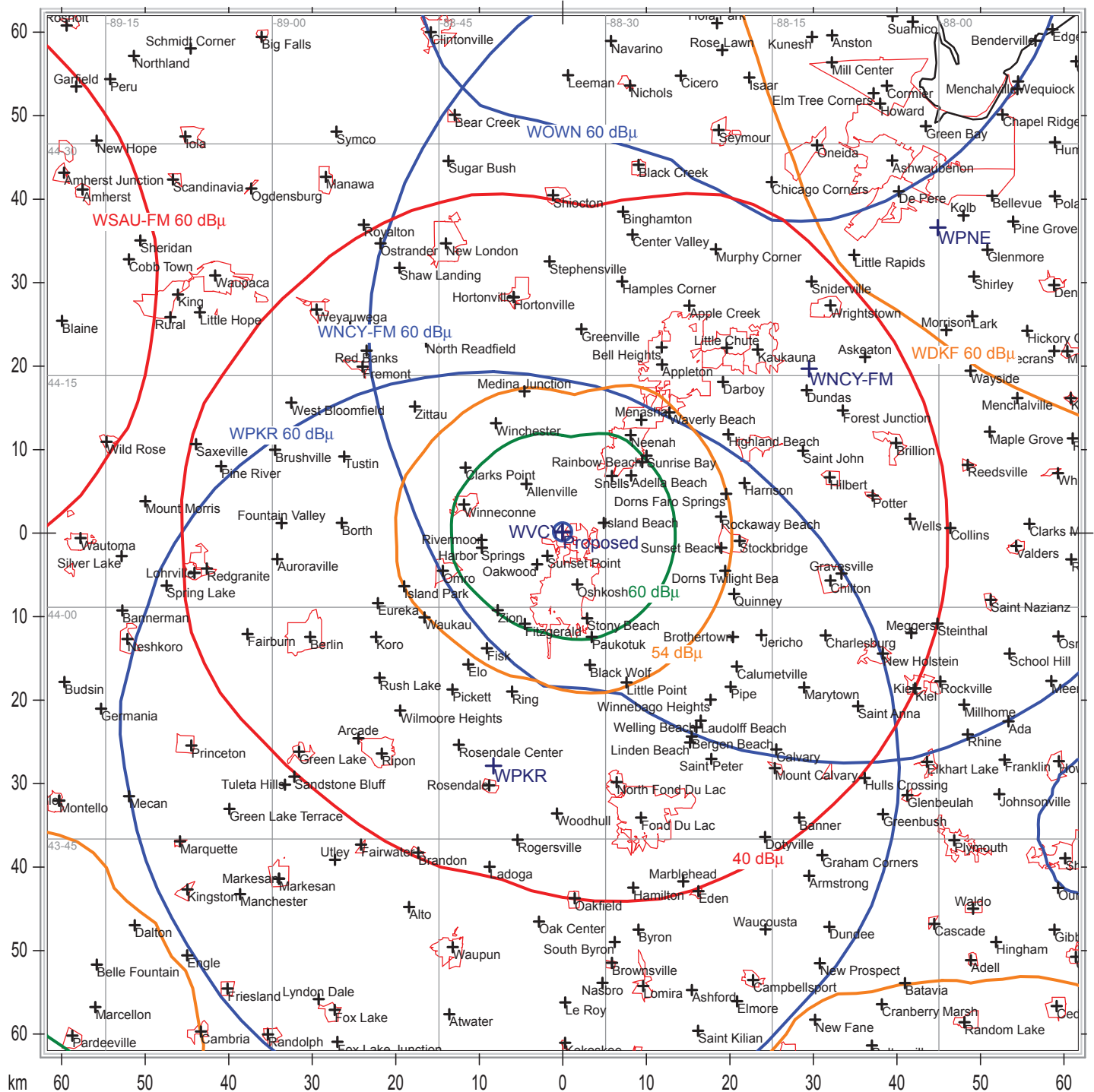


Exhibit 13 Figure 1
VCY America, Inc.
Allocation Study
Oshkosh, WI

State Borders City Borders Lat/Lon Grid

Exhibit 13 Figure 2

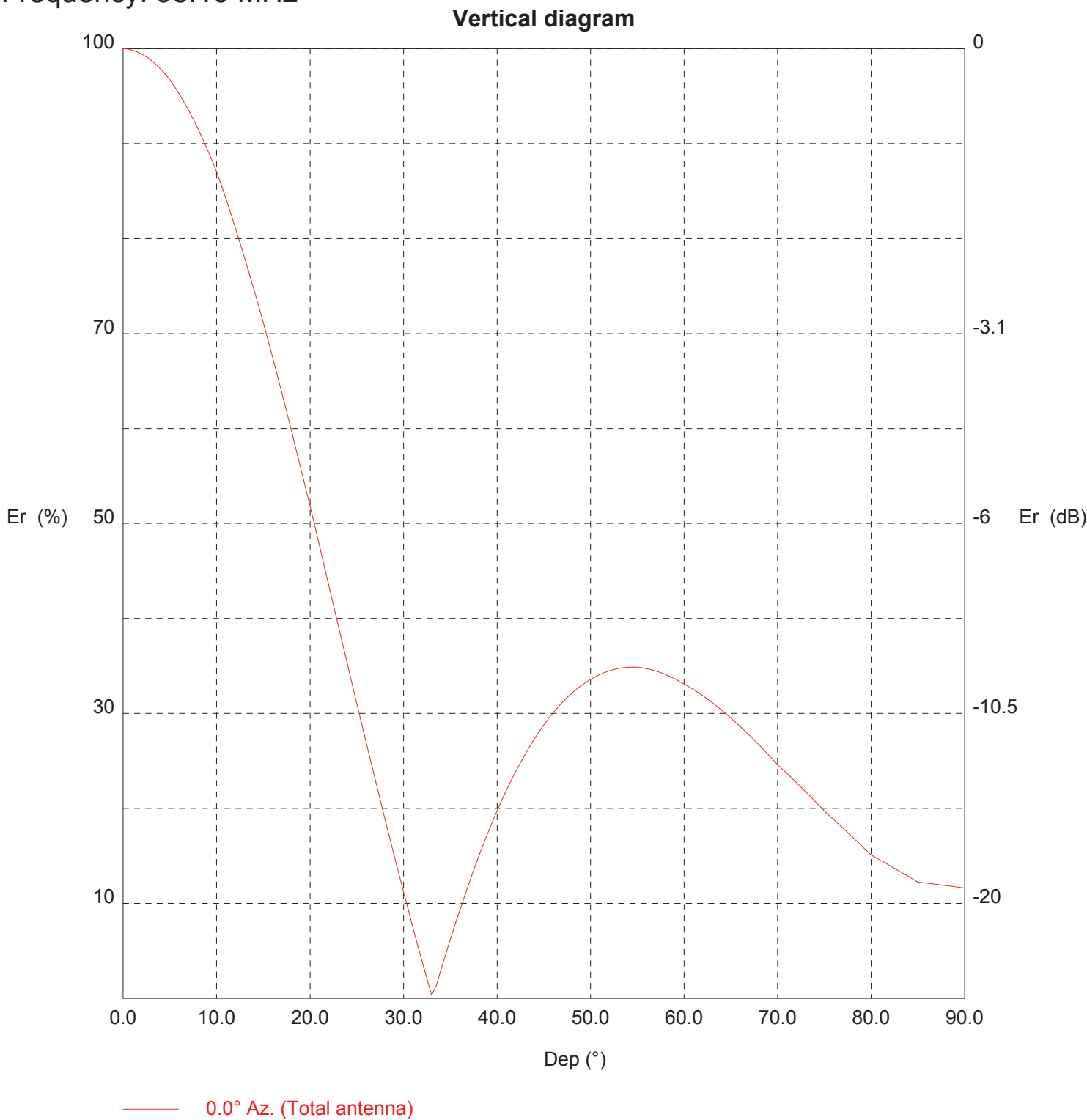
Minimum Ground Clearance

Depression Angle Below Horizontal	Antenna Relative Field	ERP (Watts)	Distance to interfering Contour from Antenna (m)	Horizontal Distance of Interfering contour from tower (m)	Vertical Clearance of Interfering contour above TGL (m)
5	0.967	233.8	442	440.3	70.5
10	0.871	189.7	398	392.0	39.9
15	0.711	126.4	325	313.9	24.9
20	0.518	67.1	237	222.7	27.9
25	0.310	24.0	142	128.7	49.0
30	0.112	3.1	51	44.2	83.5
35	0.062	1.0	29	23.8	92.4
40	0.209	10.9	95	72.8	47.9
45	0.288	20.7	132	93.3	15.7
50	0.336	28.2	153	98.3	-8.2
55	0.349	30.5	160	91.8	-22.1
60	0.331	27.4	151	75.5	-21.8
65	0.295	21.8	135	57.1	-13.4
70	0.246	15.1	112	38.3	3.8
75	0.197	9.7	90	23.3	22.1
80	0.151	5.7	69	12.0	41.0
85	0.122	3.7	56	4.9	53.2
90	0.117	3.4	53	0.0	56.0
Minimum Clearance above TGL:					2.7

TX station: BKG77/2 GENERIC

Site name: 3/4 WAVE SEPARATION

Frequency: 98.10 MHz



TX station: BKG77/2 GENERIC

Site name: 3/4 WAVE SEPARATION

Frequency: 98.10 MHz

Vertical diagram at an azimuth of 0° degrees

Dep (°)	Er (%)	ERP (W)	Dep (°)	Er (%)	ERP (W)	Dep (°)	Er (%)	ERP (W)
0.0	100.0	914.2	30.0	11.2	11.5	60.0	33.1	100.1
0.5	100.0	913.3	30.5	9.3	7.9	60.5	32.8	98.4
1.0	99.8	911.3	31.0	7.5	5.1	61.0	32.5	96.7
1.5	99.7	908.1	31.5	5.6	2.9	61.5	32.2	94.8
2.0	99.4	903.9	32.0	3.8	1.3	62.0	31.9	92.8
2.5	99.1	898.4	32.5	2.1	0.4	62.5	31.5	90.8
3.0	98.8	891.9	33.0	0.3	0.0	63.0	31.1	88.7
3.5	98.4	884.3	33.5	1.4	0.2	63.5	30.8	86.5
4.0	97.9	875.7	34.0	3.0	0.8	64.0	30.4	84.2
4.5	97.3	865.9	34.5	4.6	2.0	64.5	29.9	81.9
5.0	96.7	855.2	35.0	6.2	3.5	65.0	29.5	79.5
5.5	96.0	842.7	35.5	7.8	5.5	65.5	29.1	77.2
6.0	95.2	829.2	36.0	9.3	7.9	66.0	28.6	74.8
6.5	94.4	814.9	36.5	10.7	10.5	66.5	28.2	72.5
7.0	93.5	799.7	37.0	12.1	13.5	67.0	27.7	70.0
7.5	92.6	783.6	37.5	13.5	16.7	67.5	27.2	67.6
8.0	91.6	766.9	38.0	14.9	20.2	68.0	26.7	65.1
8.5	90.5	749.4	38.5	16.1	23.8	68.5	26.2	62.7
9.0	89.4	731.2	39.0	17.4	27.7	69.0	25.7	60.2
9.5	88.3	712.5	39.5	18.6	31.6	69.5	25.1	57.8
10.0	87.1	693.1	40.0	19.8	35.7	70.0	24.6	55.3
10.5	85.7	670.8	40.5	20.9	39.8	70.5	24.1	53.3
11.0	84.2	648.2	41.0	21.9	43.9	71.0	23.7	51.2
11.5	82.7	625.3	41.5	22.9	48.1	71.5	23.2	49.2
12.0	81.2	602.3	42.0	23.9	52.2	72.0	22.7	47.2
12.5	79.6	579.0	42.5	24.8	56.4	72.5	22.2	45.2
13.0	78.0	555.7	43.0	25.7	60.4	73.0	21.7	43.2
13.5	76.3	532.4	43.5	26.5	64.4	73.5	21.2	41.3
14.0	74.6	509.1	44.0	27.3	68.3	74.0	20.7	39.3
14.5	72.9	485.8	44.5	28.1	72.1	74.5	20.2	37.4
15.0	71.1	462.7	45.0	28.8	75.8	75.0	19.7	35.5
15.5	69.3	439.1	45.5	29.5	79.3	75.5	19.3	33.9
16.0	67.4	415.8	46.0	30.1	82.7	76.0	18.8	32.4
16.5	65.6	392.9	46.5	30.7	85.9	76.5	18.4	30.8
17.0	63.6	370.3	47.0	31.2	88.9	77.0	17.9	29.3
17.5	61.7	348.1	47.5	31.7	91.8	77.5	17.4	27.8
18.0	59.8	326.5	48.0	32.1	94.4	78.0	17.0	26.4
18.5	57.8	305.3	48.5	32.6	96.9	78.5	16.5	24.9
19.0	55.8	284.7	49.0	32.9	99.2	79.0	16.0	23.5
19.5	53.8	264.7	49.5	33.3	101.2	79.5	15.6	22.1
20.0	51.8	245.3	50.0	33.6	103.1	80.0	15.1	20.8
20.5	49.7	226.1	50.5	33.9	104.8	80.5	14.8	20.0
21.0	47.6	207.5	51.0	34.1	106.3	81.0	14.5	19.3
21.5	45.6	189.8	51.5	34.3	107.6	81.5	14.3	18.6
22.0	43.5	172.8	52.0	34.5	108.7	82.0	14.0	17.8
22.5	41.4	156.7	52.5	34.6	109.6	82.5	13.7	17.1
23.0	39.3	141.3	53.0	34.7	110.3	83.0	13.4	16.4
23.5	37.2	126.8	53.5	34.8	110.8	83.5	13.1	15.7
24.0	35.2	113.0	54.0	34.9	111.1	84.0	12.8	15.0
24.5	33.1	100.1	54.5	34.9	111.2	84.5	12.5	14.4
25.0	31.0	88.1	55.0	34.9	111.1	85.0	12.2	13.7
25.5	29.0	76.8	55.5	34.8	110.7	85.5	12.2	13.6
26.0	26.9	66.3	56.0	34.7	110.2	86.0	12.1	13.4
26.5	24.9	56.7	56.5	34.6	109.4	86.5	12.1	13.3
27.0	22.9	47.9	57.0	34.5	108.5	87.0	12.0	13.2
27.5	20.9	39.9	57.5	34.3	107.5	87.5	11.9	13.0
28.0	18.9	32.7	58.0	34.1	106.3	88.0	11.9	12.9
28.5	17.0	26.3	58.5	33.9	104.9	88.5	11.8	12.8
29.0	15.0	20.6	59.0	33.6	103.5	89.0	11.7	12.6
29.5	13.1	15.7	59.5	33.4	101.8	89.5	11.7	12.5

Exhibit 13 Figure 4
Topographic Map of the 98.3 meter Vicinity Surrounding the Proposed Tower Site

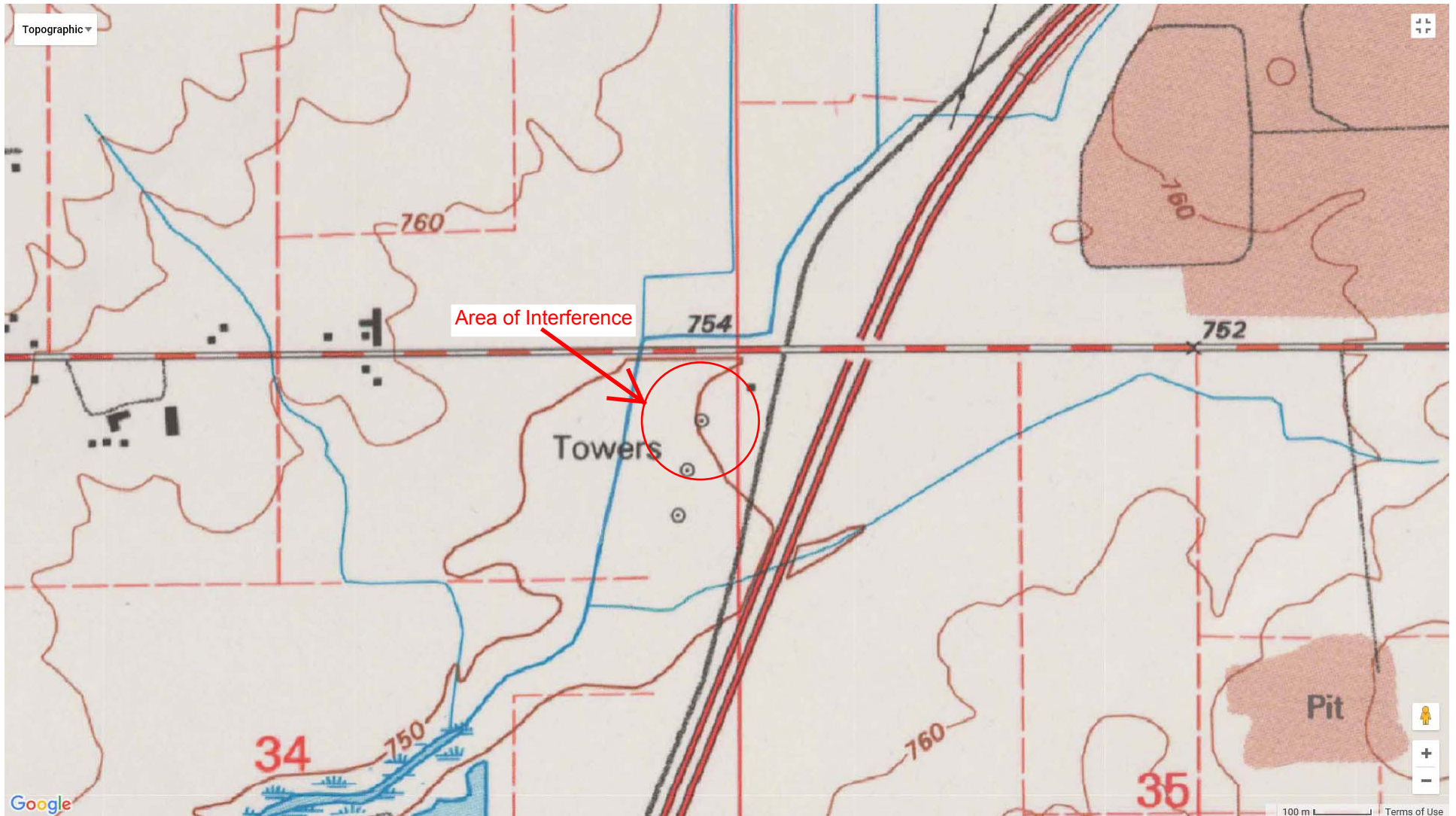


Exhibit 13 Figure 5
Aerial Photo of the 98.3 meter Vicinity Surrounding the Proposed Tower Site

