

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 151402

Channel 284

Description of Exhibit 13 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. § 74.1204.

Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.

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), 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 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. The column labeled "Overlap" shows the area of contour overlap in square kilometers.

Page 4 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 minute quadrangle at full scale with the calculated area of interference overlaid. The sheet includes the quadrangle name and measurement scale at the bottom-left corner (note: "Mt" refers to meters). The area of interference was calculated using the free space equation and 120 radials.

Page 5 of this exhibit is an aerial photo of the vicinity surrounding the proposed translator's tower site.

Compliance with 47 C.F.R. § 74.1204(d)

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 dB μ 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
687787	BMLH20030924ABI	WOMX-FM	80.1	79.7
692781	BMLH20031010ADD	WTKS-FM	80.1	79.7

Minimum F(50,50) Contour of Adjacent Station within
Proposed Translator's Standard Interfering Contour **79.7**

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 **79.7 dB μ** , this makes the proposed translator's worst-case interfering contour **119.7 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **88.9 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 4 of this exhibit). However, since the area of interference extends a maximum of **88.9 m** from the transmit antenna and the transmit antenna is **129 m** above tower ground level (TGL), the area of interference will be at least **40.1 m** above TGL at the lowest point. The applicant has taken into account USGS quadrangles and relevant aerial photography in stating 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 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.

Antenna Manufacturer: SWR
Antenna Model: FM1
CORAGL: 129 m
Maximum ERP: 0.15 kW
Interfering Contour: 119.7 dB μ
Max Int. Contour Distance: 88.9 m
Min Ground Clearance: 40.1 m

**Adjacent Channel Study
For Station NEW, Facility_id: 151402**

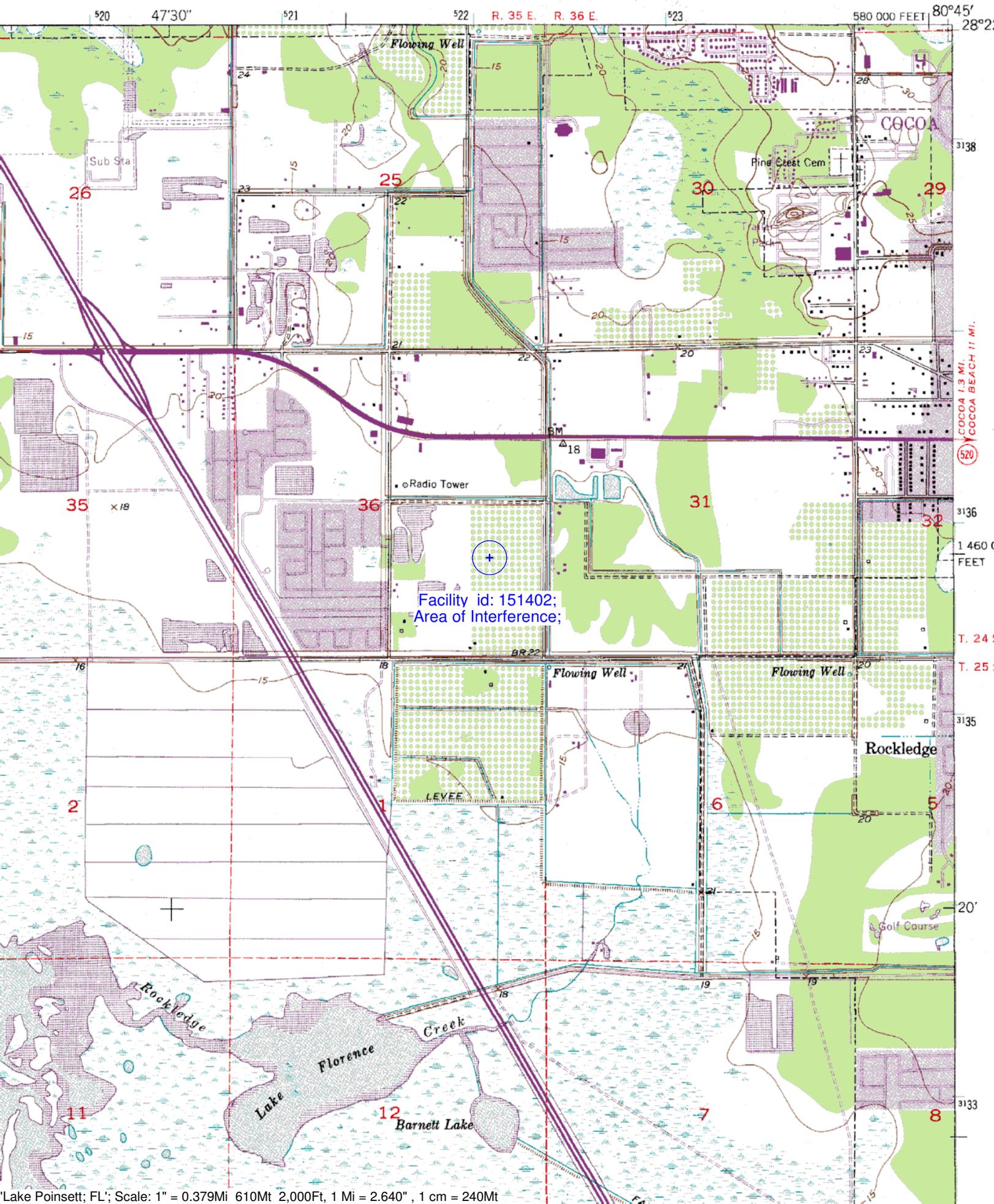
Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
692781	53457	BMLH-20031010ADD	WTKS-FM	CLEAR CHANNEL BROADCASTING LICENSES, INC	C	COCOA BEACH	FL	LIC	94	500	281	3	39	2.3183
687787	47746	BMLH-20030924ABI	WOMX-FM	CBS RADIO STATIONS INC.	C	ORLANDO	FL	LIC	94	500	286	2	39	2.3183
1160439	138521	BLFT-20061117AAT	W282BG	REACH COMMUNICATIONS, INC.	D	GRANT	FL	LIC	0.04	57	282	2	56.7	0
1514089	149386	BLFT-20120904AAI	W283AN	REACH COMMUNICATIONS, INC.	D	ALTAMONTE SPRIN	FL	LIC	0.221	181	283	1	72.5	0
1541257	151352	BLFT-20120827AEK	W284AV	VOLUSIA BROADCASTING COMPANY, LLC		DAYTONA BEACH	FL	LIC	0.12	90	284	0	96	0
1487423	151352	BPFT-20120216AAE	W284AV	VOLUSIA BROADCASTING COMPANY, LLC	D	DELTONA	FL	CP	0.12	90	284	0	96	0
694030	42065	BMLH-20031017ABR	WFLM	MIDWAY BROADCASTING COMPANY	C3	WHITE CITY	FL	LIC	17.5	124	284	0	108.9	0
1363890	42065	BPH-20100416AAN	WFLM	MIDWAY BROADCASTING COMPANY	C3	WHITE CITY	FL	CP	16.5	126.8	284	0	111.1	0
1167949	134104	BLL-20070117ADA	WVDV-LP	MINISTERIO RADIAL CRISTIANO DE SEBRING,	L1	SEBRING	FL	LIC	0	60	285	1	115	0
570673	135661	BNPL-20010615AYT	NEW	ESPERANZA ADVENTIST EDUCATIONAL RADIO	L1	SEBRING	FL	APP	0	74	283	1	115.4	0
1354153	11943	BLH-20100122AAR	WRBQ-FM	CBS RADIO STATIONS INC.	C1	TAMPA	FL	LIC	99	181	284	0	166.1	0

Intermediate Frequencies (53 and 54 channels difference):

App_id

LAKE POINSETT QUADRANGLE
FLORIDA
7.5 MINUTE SERIES (TOPOGRAPHIC)





40 yds