

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 151721

Channel 285

### **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 $\mu$  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 $\mu$  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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1538041	BMLH20130124ABI	WOKV-FM	84.6	84.6
1780145	BMLH20180307AAJ	WYKB	90.9	87.5
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>84.6</b>

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 **84.6 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **124.6 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **65.3 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population).

**Note: There are no occupied buildings or major roads within the zone of predicted interference so 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:** SCA  
**Antenna Model:** FMV-1  
**CORAGL:** 76 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 124.6 dB $\mu$   
**Max Int. Contour Distance:** 65.3 m

## Adjacent Channel Study For Station W285FE, Facility\_id: 151721

### Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1780145	40483	BMLH-20180307AAJ	WYKB	NIA BROADCASTING, INC.	A	FERNANDINA BE/	FL	LIC	3.9	128	287	2	4.7	1.4918
1538041	72081	BMLH-20130124ABI	WOKV-FM	COX RADIO, INC.	C	ATLANTIC BEACH	FL	LIC	98.8	315	283	2	24.7	1.4918
1713393	53672	BLH-20151214ACG	WBHU	FLAGLER BROADCASTING, LLC	C3	ST. AUGUSTINE E	FL	LIC	17	129	288	3	76.9	0
1497639	123502	BLL-20120430AAA	WBHS-LP	GLYNN COUNTY, GEORGIA	L1	BRUNSWICK	GA	LIC	0	39.6	285	0	78.5	0
1773373	201140	BNPFT-20171220ACI	W285FR	NATKIM RADIO, LLC	D	PALATKA	FL	CP	0.25	84	285	0	93.3	0
1177626	40704	BLH-20070329AJX	WKUB	HIGGS MULTIMEDIA GROUP, LLC	C2	BLACKSHEAR	GA	LIC	50	147.2	286	1	104.8	0
596997	59076	BLH-20020306ABA	WYGC	JVC MEDIA OF FLORIDA, LLC	A	HIGH SPRINGS	FL	LIC	3.2	163	285	0	116.9	0
204513	24208	BLH-19941202KC	WYKS	GILLEN BROADCASTING CORPO	A	GAINESVILLE	FL	LIC	3	173	287	2	121.7	0
682106	31096	BLH-20030909ACB	WIFO-FM	JESUP BROADCASTING CORP.	C3	JESUP	GA	LIC	25	120	288	3	126.8	0

### Intermediate Frequencies (53 and 54 channels difference):

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
1800303	153392	BLFT-20190214ABI	W232DA	LIGHTHOUSE CHRISTIAN BROAC	D	ST MARYS	GA	LIC	0.25	21	232	53	30.6	20.6
1735756	74071	BMLH-20160804ADH	WSOS-FM	CHESAPEAKE-PORTSMOUTH BF	C3	FRUIT COVE	FL	LIC	5.5	158	231	54	46.8	34.8

TROUT RIVER QUADRANGLE  
FLORIDA—DUVAL CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)

4645 11 SE  
(HEDGES)



