

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 148321

Channel 271

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 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.

Pages 4 through 5 include a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 6 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.

Note: The adjacent channel study indicates prohibitive overlap with the construction permit BPFT-20090817AAO for W271AM, Tuscaloosa, AL (FIN: 148570) licensed to JRD, Inc. Concurrent with the submission of this minor mod application, permittee of W271AM will simultaneously dismiss BPFT-20090817AAO.

Page 7 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 8 of this exhibit is a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by Google Earth. It has been included to provide clarification of the nature of the buildings in the vicinity. The transmit site and the zone of predicted interference are marked on the aerial photo.

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 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
1250130	BLH20080613AAJ	WDXB	101.6	101.6
624904	BLH20030207AAP	WDXB	101.6	101.6
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				101.6

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 **101.6 dBμ**, this makes the proposed translator's worst-case interfering contour **141.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **8.8 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 7 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 tower ground level (TGL) by **134.4 m** 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: DIE
Antenna Model: DCR-L2E
CORAGL: 137 m
Maximum ERP: 0.228 kW
Interfering Contour: 141.6 dBμ
Max Int. Contour Distance: 8.8 m
Min Ground Clearance: 134.4 m

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	.986	221.7	8.7	8.7	136.2
10	.946	204.0	8.3	8.2	135.6
15	.883	177.8	7.8	7.5	135.0
20	.800	145.9	7.0	6.6	134.6
25	.704	113.0	6.2	5.6	134.4
30	.601	82.4	5.3	4.6	134.4
35	.496	56.1	4.4	3.6	134.5
40	.395	35.6	3.5	2.7	134.8
45	.302	20.8	2.7	1.9	135.1
50	.221	11.1	1.9	1.3	135.5
55	.153	5.3	1.3	0.8	135.9
60	.100	2.3	0.9	0.4	136.2
65	.060	0.8	0.5	0.2	136.5
70	.032	0.2	0.3	0.1	136.7
75	.015	0.1	0.1	0.0	136.9
80	.005	0.0	0.0	0.0	137.0
85	.001	0.0	0.0	0.0	137.0
90	.000	0.0	0.0	0.0	137.0
Minimum Clearance above TGL:					134.4 m

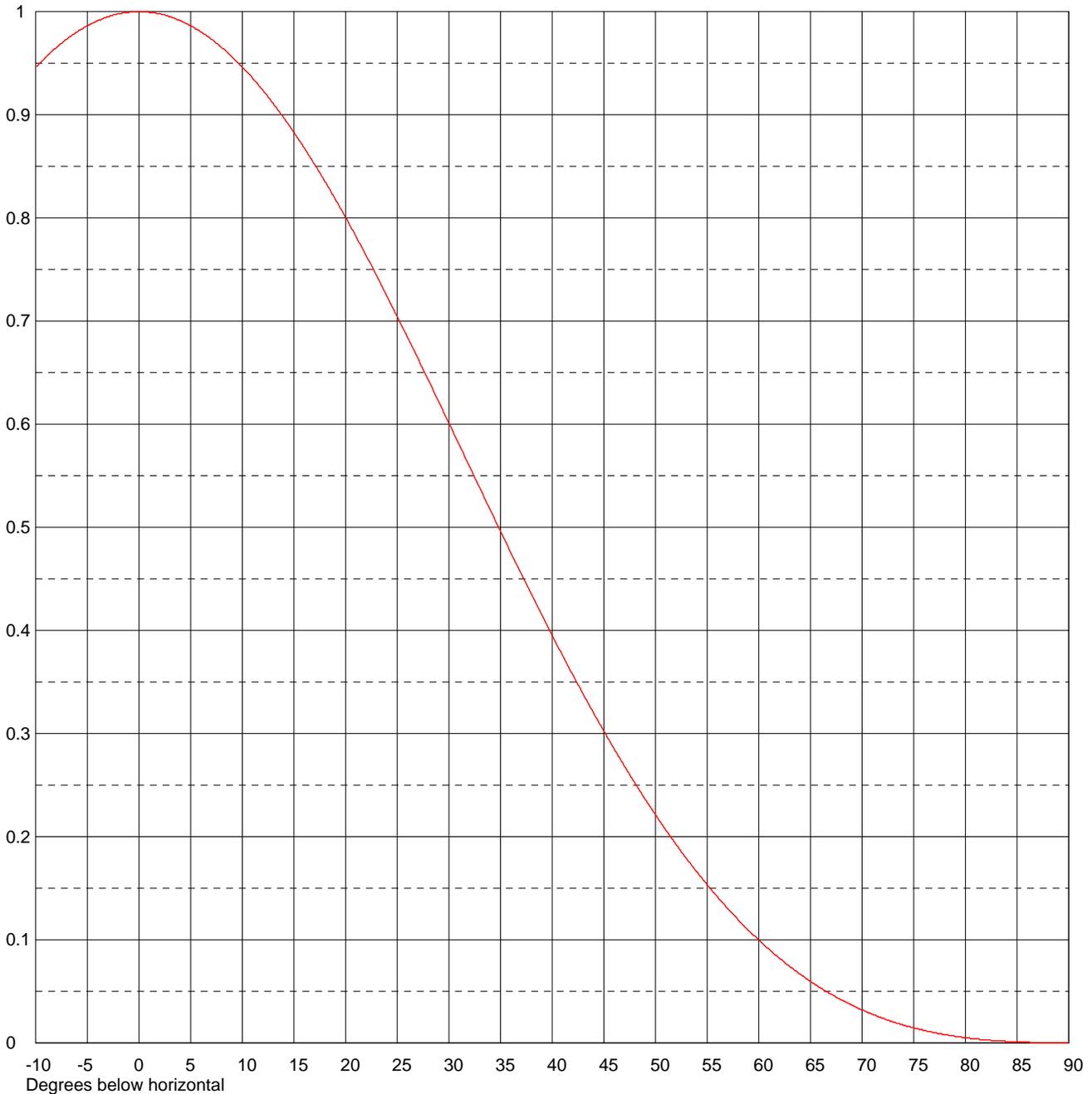


Proposal Number
Date **04 Jun 2009**
Call Letters
Location
Customer
Antenna Type **DCR-L2E**

Revision
Channel **210**

ELEVATION PATTERN

RMS Gain at Main Lobe	0.7 (-1.55 dB)	Beam Tilt	0.00 Degrees
RMS Gain at Horizontal	0.7 (-1.55 dB)	Frequency	89.90 MHz
Calculated / Measured	Calculated	Drawing #	FE02L5000013000-90



Remarks:



Proposal Number
 Date **04 Jun 2009**
 Call Letters
 Location
 Customer
 Antenna Type **DCR-L2E**

Revision
 Channel **210**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **FE02L5000013000-90**

Angle	Field										
-10.0	0.946	2.4	0.997	10.6	0.940	30.5	0.590	51.0	0.206	71.5	0.026
-9.5	0.951	2.6	0.996	10.8	0.938	31.0	0.580	51.5	0.199	72.0	0.024
-9.0	0.956	2.8	0.996	11.0	0.935	31.5	0.569	52.0	0.192	72.5	0.022
-8.5	0.961	3.0	0.995	11.5	0.930	32.0	0.559	52.5	0.185	73.0	0.020
-8.0	0.965	3.2	0.994	12.0	0.924	32.5	0.548	53.0	0.179	73.5	0.019
-7.5	0.969	3.4	0.994	12.5	0.917	33.0	0.538	53.5	0.172	74.0	0.017
-7.0	0.973	3.6	0.993	13.0	0.911	33.5	0.527	54.0	0.166	74.5	0.016
-6.5	0.977	3.8	0.992	13.5	0.904	34.0	0.517	54.5	0.160	75.0	0.015
-6.0	0.980	4.0	0.991	14.0	0.897	34.5	0.506	55.0	0.153	75.5	0.013
-5.5	0.983	4.2	0.990	14.5	0.890	35.0	0.496	55.5	0.147	76.0	0.012
-5.0	0.986	4.4	0.989	15.0	0.883	35.5	0.486	56.0	0.142	76.5	0.011
-4.5	0.989	4.6	0.988	15.5	0.875	36.0	0.475	56.5	0.136	77.0	0.010
-4.0	0.991	4.8	0.987	16.0	0.868	36.5	0.465	57.0	0.130	77.5	0.009
-3.5	0.993	5.0	0.986	16.5	0.860	37.0	0.455	57.5	0.125	78.0	0.008
-3.0	0.995	5.2	0.985	17.0	0.852	37.5	0.445	58.0	0.119	78.5	0.007
-2.8	0.996	5.4	0.984	17.5	0.844	38.0	0.435	58.5	0.114	79.0	0.006
-2.6	0.996	5.6	0.983	18.0	0.835	38.5	0.425	59.0	0.109	79.5	0.006
-2.4	0.997	5.8	0.982	18.5	0.827	39.0	0.415	59.5	0.104	80.0	0.005
-2.2	0.997	6.0	0.980	19.0	0.818	39.5	0.405	60.0	0.100	80.5	0.004
-2.0	0.998	6.2	0.979	19.5	0.809	40.0	0.395	60.5	0.095	81.0	0.004
-1.8	0.998	6.4	0.978	20.0	0.800	40.5	0.385	61.0	0.091	81.5	0.003
-1.6	0.999	6.6	0.976	20.5	0.791	41.0	0.376	61.5	0.086	82.0	0.003
-1.4	0.999	6.8	0.975	21.0	0.782	41.5	0.366	62.0	0.082	82.5	0.002
-1.2	0.999	7.0	0.973	21.5	0.773	42.0	0.357	62.5	0.078	83.0	0.002
-1.0	0.999	7.2	0.972	22.0	0.763	42.5	0.347	63.0	0.074	83.5	0.002
-0.8	1.000	7.4	0.970	22.5	0.754	43.0	0.338	63.5	0.070	84.0	0.001
-0.6	1.000	7.6	0.969	23.0	0.744	43.5	0.329	64.0	0.067	84.5	0.001
-0.4	1.000	7.8	0.967	23.5	0.734	44.0	0.320	64.5	0.063	85.0	0.001
-0.2	1.000	8.0	0.965	24.0	0.724	44.5	0.311	65.0	0.060	85.5	0.001
0.0	1.000	8.2	0.964	24.5	0.714	45.0	0.302	65.5	0.056	86.0	0.001
0.2	1.000	8.4	0.962	25.0	0.704	45.5	0.294	66.0	0.053	86.5	0.000
0.4	1.000	8.6	0.960	25.5	0.694	46.0	0.285	66.5	0.050	87.0	0.000
0.6	1.000	8.8	0.958	26.0	0.684	46.5	0.277	67.0	0.047	87.5	0.000
0.8	1.000	9.0	0.956	26.5	0.674	47.0	0.268	67.5	0.044	88.0	0.000
1.0	0.999	9.2	0.954	27.0	0.664	47.5	0.260	68.0	0.042	88.5	0.000
1.2	0.999	9.4	0.952	27.5	0.653	48.0	0.252	68.5	0.039	89.0	0.000
1.4	0.999	9.6	0.950	28.0	0.643	48.5	0.244	69.0	0.037	89.5	0.000
1.6	0.999	9.8	0.948	28.5	0.632	49.0	0.236	69.5	0.034	90.0	0.000
1.8	0.998	10.0	0.946	29.0	0.622	49.5	0.229	70.0	0.032		
2.0	0.998	10.2	0.944	29.5	0.611	50.0	0.221	70.5	0.030		
2.2	0.997	10.4	0.942	30.0	0.601	50.5	0.214	71.0	0.028		

Remarks:

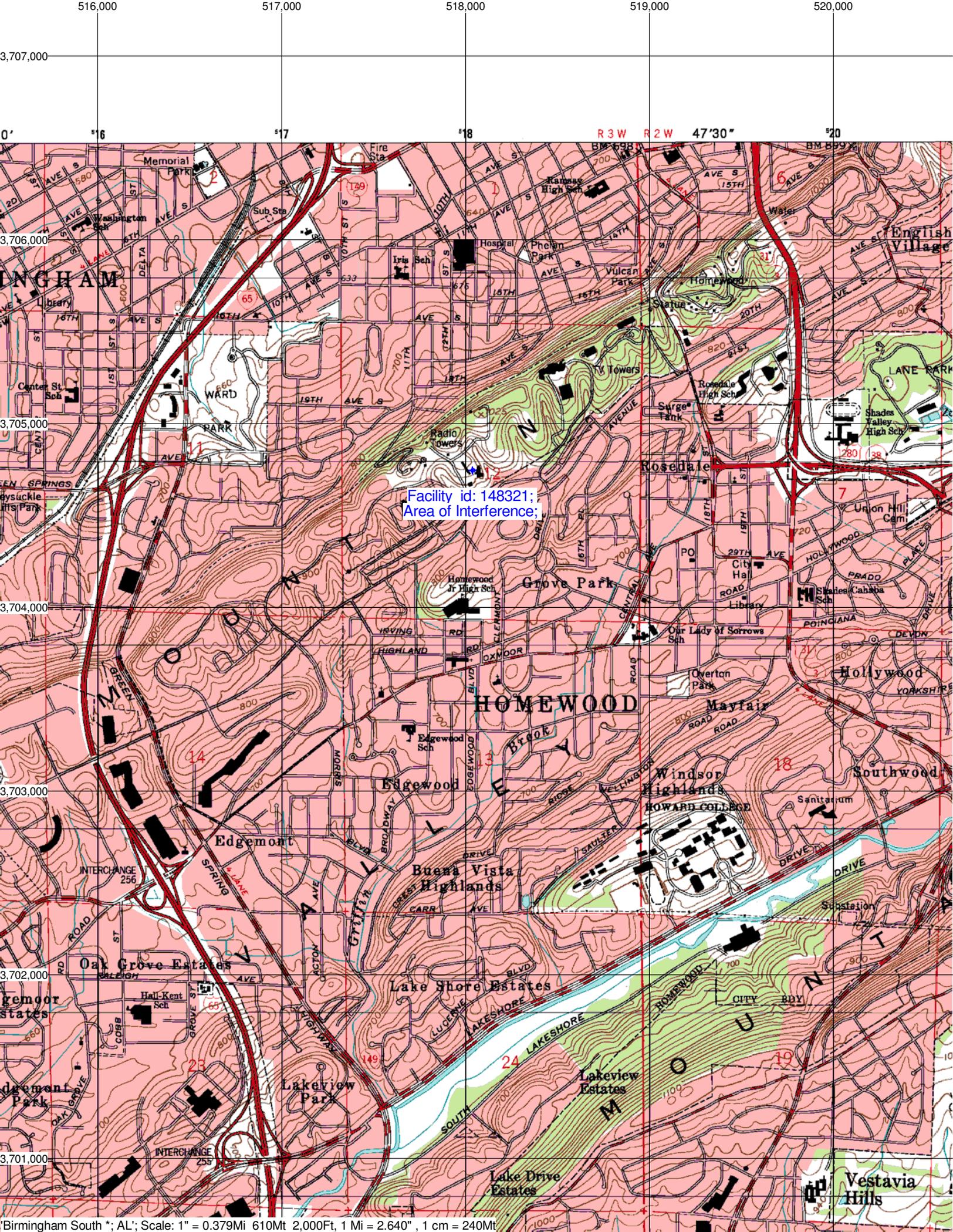
**Adjacent Channel Study
For Station W270BW, Facility_id: 148321**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1328573	148570	BPFT	20090817AAO	W271AM	JRD, INC.	D	TUSCALOOSA	AL	CP	0.25	754	271	0	55.2	387.881
1250130	2114	BLH	20080613AAJ	WDXB	CAPSTAR TX LLC	C1	PELHAM	AL	LIC	90	494	273	2	8.2	1.4918
1065257	2114	BXLH	20050527BJK	WDXB	CAPSTAR TX LLC	C1	JASPER	AL	LIC	32	402	273	2	8.2	1.4918
1102133	41641	BLEDD	20051201BVO	WQEM	GLEN IRIS BAPTIST SCHOOL	A	COLUMBIANA	AL	LIC	1.8	365	268	3	29.5	0
641114	148301	BNPFT	20030317CW/	NEW	RADIO ASSIST MINISTRY, INC.	D	ONEONTA	AL	APP	0.01	603	269	2	54.9	0
1332546	150814	BLFT	20090904ADA	W268BM	EDGEWATER BROADCASTING, INC.	D	JASPER	AL	LIC	0.25	241	268	3	61.4	0
1245725	148570	BLFT	20080509AAQ	W271AM	JRD, INC.	D	TUSCALOOSA	AL	LIC	0.099	267	271	0	75.1	0
641126	148313	BNPFT	20030317CQA	NEW	RADIO ASSIST MINISTRY, INC.	D	CULLMAN	AL	APP	0.01	395.8	268	3	78	0
637836	145285	BNPFT	20030314BMD	NEW	BOARD OF TRUSTEES OF JACKSONVILLE STA	D	OXFORD	AL	APP	0.01	551	271	0	86.3	0
631152	139982	BNPFT	20030312AVS	NEW	JACOBS BROADCAST GROUP, INC.	D	ANNISTON	AL	APP	0.1	271	273	2	92.5	0
220648	5195	BLFT	19960220TC	W269AX	BIBLE BROADCASTING NETWORK, INC.	D	ANNISTON	AL	LIC	0.01	425	269	2	95.4	0
597108	67577	BLH	20020308AAT	WBEI	RADIO LICENSE HOLDING CBC, LLC	C2	REFORM	AL	LIC	22.5	309	269	2	100.8	0
632683	141150	BNPFT	20030311AKY	NEW	WAY-FM MEDIA GROUP, INC.	D	MOUNTAIN VIEW	AL	APP	0.01	383	268	3	102.2	0
641111	148298	BNPFT	20030317CSQ	NEW	RADIO ASSIST MINISTRY, INC.	D	ALBERTVILLE	AL	APP	0.013	424	269	2	103.1	0
641118	148305	BNPFT	20030317CPE	NEW	RADIO ASSIST MINISTRY, INC.	D	ALBERTVILLE	AL	APP	0.01	389.4	268	3	104	0
1259654	157012	BMPFT	20080728ADR	W269CG	JOHN A. HAIN, JR.	D	PRICEVILLE	AL	CP MOD	0.01	307	269	2	114.4	0
641167	148352	BNPFT	20030317CTT	NEW	RADIO ASSIST MINISTRY, INC.	D	SELMA	AL	APP	0.013	151	268	3	118.3	0
1174980	66910	BMLH	20070402ADP	WHHY-FM	CUMULUS LICENSING LLC	C0	MONTGOMERY	AL	LIC	100	397	270	1	132.9	0

Intermediate Frequencies (53 and 54 channels difference):

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
1035980	69168	BXLED	20041220ABN	WUAL-FM	UNIVERSITY OF ALABAMA	C1	TUSCALOOSA	AL	LIC	10	241	218	53	71.1	49.1
37407	69168	BLED	19811221AO	WUAL-FM	UNIVERSITY OF ALABAMA	C1	TUSCALOOSA	AL	LIC	100	262	218	53	71.2	49.2
238556	68099	BLED	19961230KA	WTBJ	TRINITY CHRISTIAN ACADEMY	A	OXFORD	AL	LIC	0.17	771	217	54	92.4	82.4
511639	23002	BLED	20000811AAB	WSGN	GADSDEN STATE COMMUNITY COLLEGE	C3	GADSDEN	AL	LIC	6.3	384	218	53	98	86



Facility id: 148321;
Area of Interference;



148321 - Proposed 141.6 dBu

Image U.S. Geological Survey
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Imagery Date: Feb 28, 2002

33°29'02.00" N 86°48'21.00" W elev 282 m

Eye alt 894 m