

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 153382

Channel 295

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.

Note: The quadrangle and aerial photo indicate the presence of unpaved roads in the area of interference. The zone does not extend over US Highway 17. The zone of predicted interference extends 716.1m from the proposed transmit site. The nearest building is 935m away to the east on Bird Lane, so 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.

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
1298077	BLH20090310AAB	WJGH	74.7	74.1
218294	BLH19960111KA	WKBX	63.8	63.8
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				63.8

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 **63.8 dBμ**, this makes the proposed translator's worst-case interfering contour **103.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **716.1 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: The quadrangle and aerial photo indicate the presence of unpaved roads in the area of interference. The zone does not extend over US Highway 17. The zone of predicted interference extends 716.1m from the proposed transmit site. The nearest building is 935m away to the east on Bird Lane, so 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: NIC
Antenna Model: BLD1/P
CORAGL: 11 m
Maximum ERP: 0.25 kW
Interfering Contour: 103.8 dBμ
Max Int. Contour Distance: 716.1 m

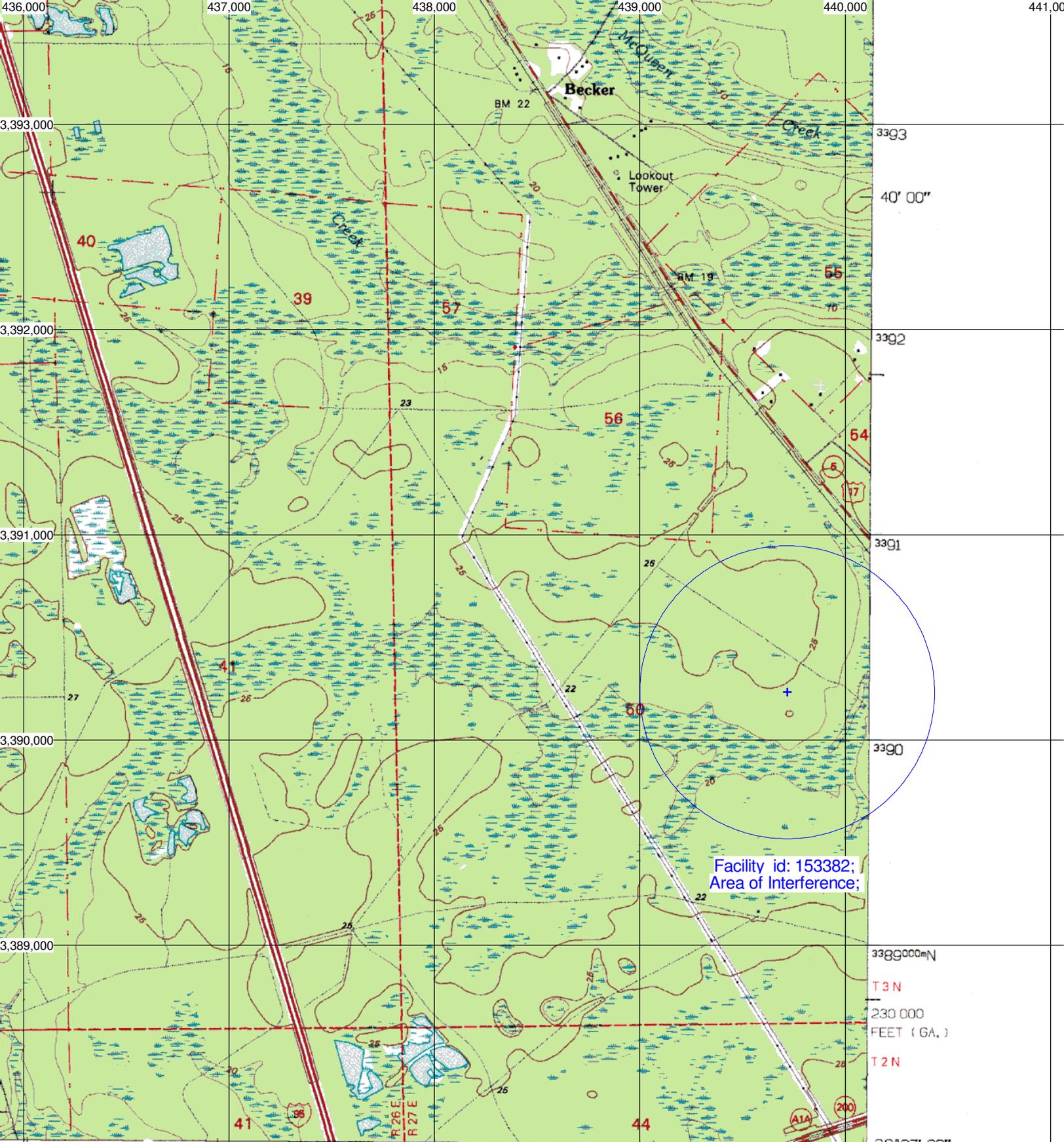
**Adjacent Channel Study
For Station W295AG, Facility_id: 153382**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
218294	54649	BLH	19960111KA	WKBX	RADIO KINGS BAY, INC.	A	KINGSLAND	GA	LIC	6	101	292	3	18	1.4918
1298077	51974	BLH	20090310AAB	WJGH	CLEAR CHANNEL BROADCASTING LICENSES, I	C1	GREEN COVE SPRINGS	FL	LIC	98	310	297	2	40.9	1.4918
680588	28894	BMLH	20030908ABP	WOKV-FM	COX RADIO, INC.	A	PONTE VEDRA BEACH	FL	LIC	6	104	293	2	41.4	0
1397038	152950	BPFT	20100825AAU	W295AZ	REACH COMMUNICATIONS, INC.	D	JACKSONVILLE BEACH	FL	CP	0.06	254	295	0	41.5	0
1216375	152950	BLFT	20071025ACK	W295AZ	REACH COMMUNICATIONS, INC.	D	JACKSONVILLE BEACH	FL	LIC	0.01	254	295	0	41.5	0
1093676	51974	BXLH	20051026AAS	WJGH	CLEAR CHANNEL BROADCASTING LICENSES, I	C1	JACKSONVILLE	FL	LIC	42	150	297	2	62.1	0
527402	16906	BMLH	20000803ACB	WEAG-FM	DICKERSON BROADCASTING, INC.	A	STARKE	FL	LIC	2.7	196	292	3	91.5	0
1311663	170483	BNPH	20070501AFY	NEW	MATTOX BROADCASTING, INC.	A	PATTERSON	GA	CP	6	123.9	296	1	94.9	0
601300	9033	BLH	20020425ABR	WCJX	RTG RADIO, LLC, DEBTOR-IN-POSSESSION	A	FIVE POINTS	FL	LIC	3.8	141	293	2	109.9	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
120105	55706	BLH	19881109KA	WEJZ	RENDA BROADCASTING CORP. OF NEVADA	C0	JACKSONVILLE	FL	LIC	100	304	241	54	35.8	10.8
1383107	140868	BLFT	20100630BHW	W242BE	VICTOR M. VICKERS	D	WAYCROSS	GA	LIC	0.25	94	242	53	91.8	81.8



Facility id: 153382;
Area of Interference;



QUADRANGLE LOCATION

1	2	3
1 Kings Ferry	2 Kingland	3 Harrietta Bluff

INTERIOR - GEOLOGICAL SURVEY, RESTON, VIRGINIA - 1985
ROAD CLASSIFICATION

- | | |
|---|--|
| Primary highway
hard surface | Light-duty road, hard or
improved surface |
| Secondary highway
hard surface | Unimproved road |
| Interstate Route | U.S. Route |
| | State Route |



