

## **Non-Interference Compliance**

Regarding Facility id 152366

Channel 258

### **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 dBμ 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 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
566716	BLH20010530AAX	WDEN-FM	121.5	100
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>100</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 **100 dBμ**, this makes the proposed translator's worst-case interfering contour **140 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **7 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 only structures within the zone of predicted interference are unoccupied communications buildings 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:** ERI  
**Antenna Model:** LPX-1E  
**CORAGL:** 225 m  
**Maximum ERP:** 0.099 kW  
**Interfering Contour:** 140 dBμ  
**Max Int. Contour Distance:** 7 m

# **Adjacent Channel Study** **For Station W258AP, Facility\_id: 152366**

## **Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
566716	46996	BLH-20010530AAX	WDEN-FM	CUMULUS LICENSING LLC	C1	MACON	GA	LIC	100	290	256	2	1.6	0.5908
288964	41990	BLH-6007	WQMJ	ROBERTS COMMUNICATIONS, IN	A	FORSYTH	GA	LIC	3	246	261	3	38	0
1756178	15309	BMLED-20170407AA	WNNG-FM	AUGUSTA RADIO FELLOWSHIP II	A	UNADILLA	GA	LIC	6	212	260	2	53.1	0
188725	54830	BMLH-19930802KC	WSNT-FM	RADIO STATION WSNT, INC.	A	SANDERSVILLE	GA	LIC	3	174	260	2	74.4	0
1450318	152354	BLFT-20111012AEH	W259AK	RADIOJONES, LLC	D	SWAINSBORO	GA	LIC	0.25	171	259	1	114.2	0
1244983	153974	BLFT-20080505ABM	W261BG	RADIO TRAINING NETWORK, INC	D	MORROW	GA	LIC	0.005	397	261	3	116	0
1770833	201381	BNPFT-20171204AAI	W256DJ	VANESSA NGUYEN	D	CONYERS	GA	CP	0.004	579	256	2	117.6	0
1251967	51120	BLH-20080626ABC	WPUP	COX RADIO, INC.	A	WATKINSVILLE	GA	LIC	4.3	311	261	3	133.4	0
660254	73345	BLH-20030514ABW	WWWQ	RADIO LICENSE HOLDING SRC L	C0	ATLANTA	GA	LIC	96.6	612	259	1	138.2	0
147077	66668	BMLH-19900403KA	WHTY	CC LICENSES, LLC, AS DEBTOR	A	PHENIX CITY	AL	LIC	6	225	261	3	138.4	0
1424511	54670	BLH-20110411ABS	WKN	PMB BROADCASTING, LLC	C2	FORT BENNING S	GA	LIC	29	276.9	257	1	143.7	0
1679452	71343	BMLH-20150602AAW	WKAA	SOUTHERN COMMUNICATIONS,	C1	WILLACOOCHEE	GA	LIC	73	302	258	0	176.4	0





