

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 151900

Channel 238

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.

Page 4 includes a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 5 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 6 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 7 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
576363	BLH20010810AAD	WMGB	83.6	83.6
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			83.6

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 **83.6 dB μ** , this makes the proposed translator's worst-case interfering contour **123.6 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **73.3 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 6 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 **51.5 m** at the lowest point.

Note: The tallest buildings within the zone of predicted interference are less than 15ft (4.6m) in height. This application provides 51.5m (169ft) ground clearance 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:	NIC
Antenna Model:	BKG77
CORAGL:	84 m
Maximum ERP:	0.25 kW
Interfering Contour:	123.6 dBμ
Max Int. Contour Distance:	73.3 m
Min Ground Clearance:	51.5 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	.999	249.5	73.2	72.9	77.6
10	.982	241.1	72.0	70.9	71.5
15	.954	227.5	69.9	67.5	65.9
20	.918	210.7	67.3	63.2	61.0
25	.871	189.7	63.8	57.8	57.0
30	.818	167.3	59.9	51.9	54.0
35	.758	143.6	55.5	45.5	52.1
40	.691	119.4	50.6	38.8	51.5
45	.616	94.9	45.1	31.9	52.1
50	.538	72.4	39.4	25.3	53.8
55	.465	54.1	34.1	19.5	56.1
60	.391	38.2	28.7	14.3	59.2
65	.313	24.5	22.9	9.7	63.2
70	.239	14.3	17.5	6.0	67.5
75	.176	7.7	12.9	3.3	71.5
80	.128	4.1	9.4	1.6	74.8
85	.103	2.7	7.5	0.7	76.5
90	.105	2.8	7.7	0.0	76.3
Minimum Clearance above TGL:					51.5 m



BKO77

Vertical	-66	0.297	54	0.479	174	0.468
Values	-63	0.345	57	0.436	177	0.479
-180	0.487	-60	0.391	60	0.391	
-177	0.478	-57	0.436	63	0.345	
-174	0.467	-54	0.479	66	0.297	
-171	0.460	-51	0.523	69	0.253	
-168	0.454	-48	0.568	72	0.211	
-165	0.447	-45	0.616	75	0.176	
-162	0.439	-42	0.661	78	0.145	
-159	0.429	-39	0.706	81	0.120	
-156	0.419	-36	0.745	84	0.105	
-153	0.402	-33	0.783	87	0.100	
-150	0.385	-30	0.818	90	0.105	
-147	0.369	-27	0.852	93	0.118	
-144	0.359	-24	0.881	96	0.134	
-141	0.350	-21	0.910	99	0.151	
-138	0.338	-18	0.934	102	0.168	
-135	0.326	-15	0.954	105	0.185	
-132	0.314	-12	0.972	108	0.202	
-129	0.303	-9	0.987	111	0.219	
-126	0.290	-6	0.999	114	0.236	
-123	0.278	-3	0.999	117	0.252	
-120	0.265	0	1.000	120	0.265	
-117	0.251	3	0.999	123	0.278	
-114	0.236	6	0.999	126	0.290	
-111	0.218	9	0.987	129	0.304	
-108	0.202	12	0.972	132	0.314	
-105	0.185	15	0.954	135	0.327	
-102	0.168	18	0.934	138	0.338	
-99	0.151	21	0.910	141	0.350	
-96	0.134	24	0.881	144	0.360	
-93	0.118	27	0.852	147	0.370	
-90	0.105	30	0.818	150	0.386	
-87	0.100	33	0.783	153	0.403	
-84	0.105	36	0.745	156	0.420	
-81	0.120	39	0.706	159	0.430	
-78	0.145	42	0.661	162	0.440	
-75	0.176	45	0.616	165	0.448	
-72	0.211	48	0.568	168	0.455	
-69	0.253	51	0.523	171	0.461	

Better than SWR

Adjacent Channel Study For Station W238CG, Facility_id: 151900

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
576363	88541	BLH-20010810AAD	WMGB	CUMULUS LICENSING LLC	C2	MONTEZUMA	GA	LIC	46	237	236	2	13.9	1.4918
1189459	158306	BLFT-20070612ABT	W240BK	AMFM RADIO LICENSES, L.L.C., A	D	RUTLAND	GA	LIC	0.25	135	240	2	14.2	0
1773259	201216	BNPFT-20171201AKF	W241CO	CENTRAL GEORGIA RADIO LLC	D	HAWKINSVILLE	GA	CP	0.25	166	241	3	39.3	0
1497152	23907	BLED-20120424AAI	WGUR	GEORGIA COLLEGE & STATE UN	D	MILLEDGEVILLE	GA	LIC	0.085	130	237	1	63.1	0
1204031	156732	BLFT-20070907AGX	W239AY	PRIETO BROADCASTING, INC.	D	CORDELE	GA	LIC	0.038	174	239	1	77.2	0
986642	62474	BLH-20040405ACI	WQZY	STATE RADIO LICENSE, INC.	C0	DUBLIN	GA	LIC	100	404	240	2	98.2	0
1365640	50534	BLH-20100429AEB	WIOL-FM	DAVIS BROADCASTING, INC. OF	A	WAVERLY HALL	GA	LIC	6	279	239	1	106.6	0
1783302	202896	BNPFT-20180418AA\	W237EZ	RADIOJONES, LLC	D	SWAINSBORO	GA	CP	0.25	171	237	1	116.8	0
1780407	11710	BPH-20060501AOE	WSBB-FM	COX RADIO, INC.	C1	DORAVILLE	GA	CP	100	560	238	0	145.1	0
1612107	29735	BLH-20131218COP	WUBL	CITICASTERS LICENSES, INC., A:	C1	ATLANTA	GA	LIC	78	612	235	3	150	0
1612109	11275	BLH-20131218CWH	WWPW	CITICASTERS LICENSES, INC., A:	C0	ATLANTA	GA	LIC	97	612	241	3	150	0
1206225	11710	BLH-20070926AKM	WSBB-FM	COX RADIO, INC.	C1	DORAVILLE	GA	LIC	40	747	238	0	170.5	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
152533	64641	BLH-19900921KD	WQBZ	AMFM RADIO LICENSES, L.L.C., A	C2	FORT VALLEY	GA	LIC	48	268	292	54	21.6	6.6



