

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 150818

Channel 261

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.

Pages 5 and 6 of this exhibit are aerial photos 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
1221766	BLH20071210ADE	WAPI-FM	63.4	63.3
260992	BLH19980128KB	WZRR	109.9	109.3
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				63.3

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 **63.3 dBμ**, this makes the proposed translator's worst-case interfering contour **103.3 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **151.7 m** from the transmit antenna.

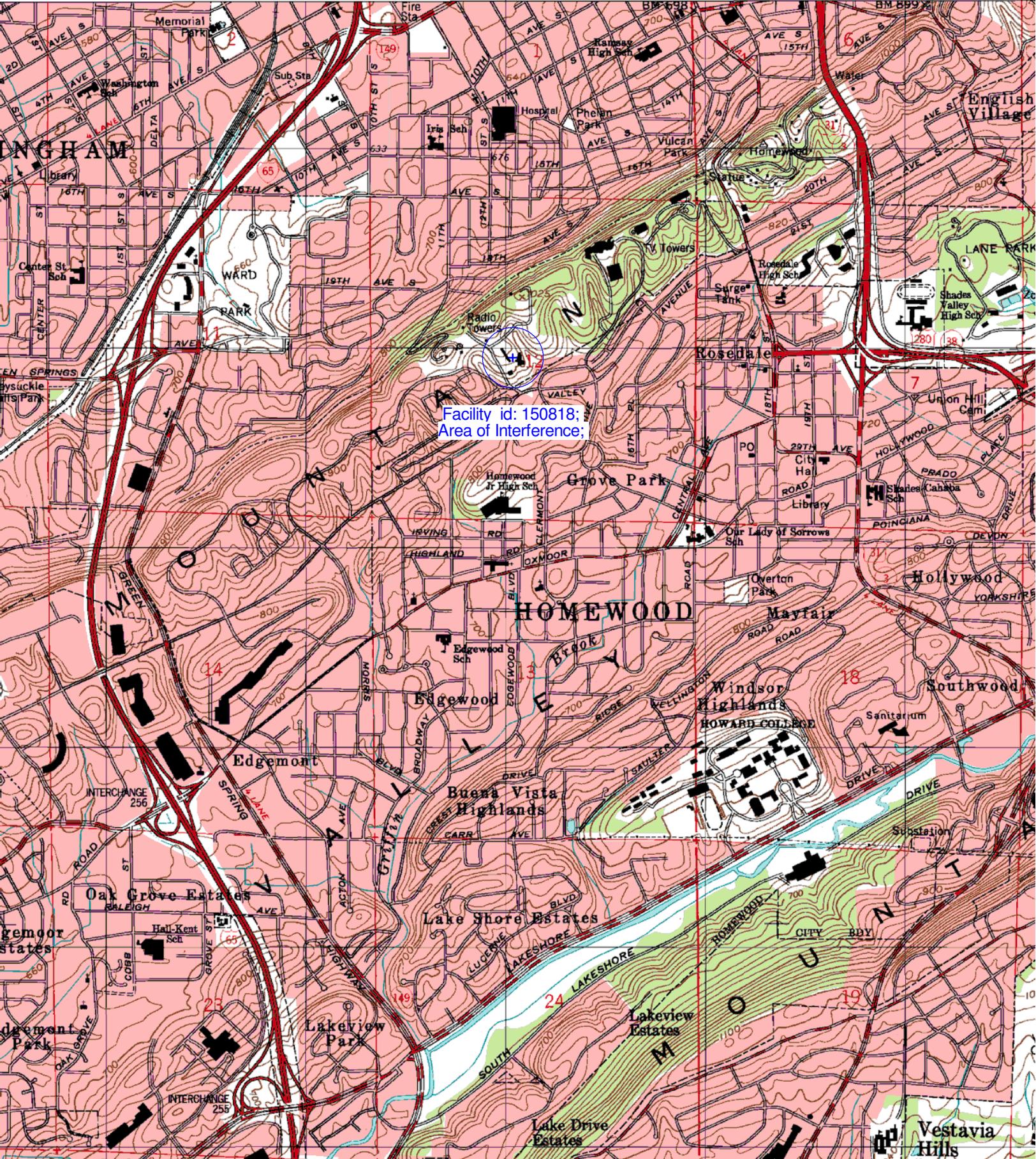
The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). However, since the area of interference extends a maximum of **151.7 m** from the transmit antenna and the transmit antenna is **258 m** above tower ground level (TGL), the area of interference will be at least **106.3 m** above TGL 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: SHI
Antenna Model: 6014
CORAGL: 258 m
Maximum ERP: 0.01 kW
Interfering Contour: 103.3 dBμ
Max Int. Contour Distance: 151.7 m
Min Ground Clearance: 106.3 m

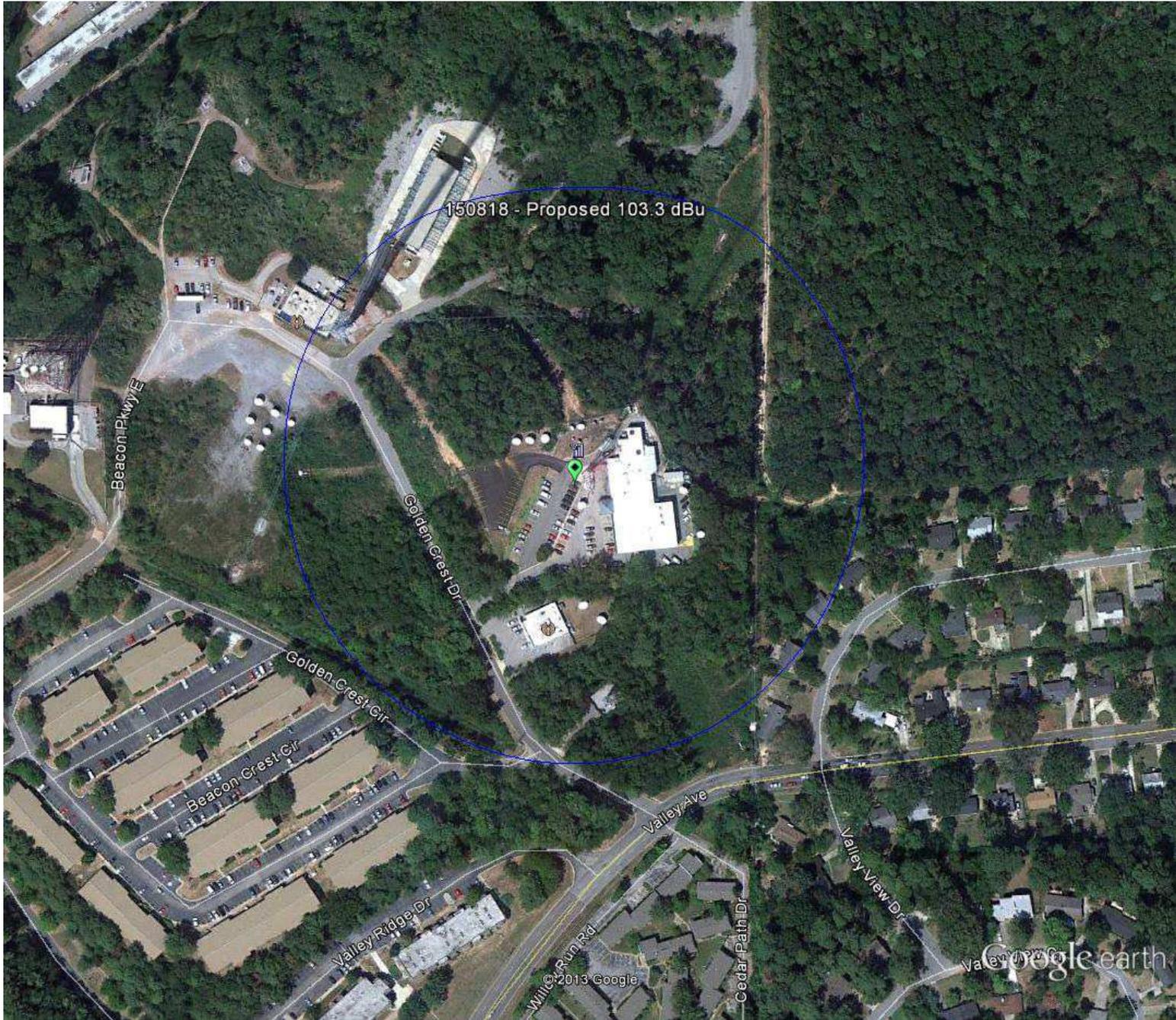
Adjacent Channel Study For Station NEW, Facility_id: 150818

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1177228	16899	BXLH	20070411ACV	WZRR	RADIO LICENSE HOLDING CBC, LLC	C0	BIRMINGHAM	AL	LIC	50	438.8	258	3	4.7	0.1545
260992	16899	BLH	19980128KB	WZRR	RADIO LICENSE HOLDING CBC, LLC	C0	BIRMINGHAM	AL	LIC	100	491	258	3	4.7	0.1545
293489	16899	Null	Null	WZRR	RADIO LICENSE HOLDING CBC, LLC	C0	BIRMINGHAM	AL	USE	0	0	258	3	8.6	0.1545
1221766	70914	BLH	20071210ADE	WAPI-FM	RADIO LICENSE HOLDING CBC, LLC	C1	HELENA	AL	LIC	69	430.4	263	2	60.1	0.1545
574057	0	RM	10323*	Null		C1	HELENA	AL	USE	0	0	263	2	58.2	0
1183005	70914	BXLH	20070504ACQ	WAPI-FM	RADIO LICENSE HOLDING CBC, LLC	C1	NORTHPORT	AL	LIC	35	368.8	263	2	60.1	0
1537160	135721	BLL	20130111AAA	WQJJ-LP	NORTH ALABAMA PUBLIC SERVICE BROAD	L1	JASPER	AL	LIC	0	184	261	0	62.3	0
1443257	150872	BPFT	20110907AMO	W261BT	EDGEWATER BROADCASTING, INC.	D	TUSCALOOSA	AL	CP	0.25	246	261	0	75.1	0
1442590	150872	BLFT	20110901ABT	W261BT	EDGEWATER BROADCASTING, INC.	D	TUSCALOOSA	AL	LIC	0.204	246	261	0	75.1	0
498001	70914	Null	Null	WAPI-FM	RADIO LICENSE HOLDING CBC, LLC	C1	NORTHPORT	AL	USE	0	0	263	2	84	0
1320386	165962	BLH	20090630ABP	WCKF	WCKF, L.L.C.	A	ASHLAND	AL	LIC	1.7	529	264	3	89.6	0
1504933	184996	BNPED	20100226ABT	NEW	ANNISTON SEVENTH-DAY ADVENTIST CHU	C3	ANNISTON	AL	CP	25	316.4	261	0	90.9	0
1290562	57436	BLH	20090121ACG	WRJL-FM	ROJO, INC.	C3	EVA	AL	LIC	25	362	260	1	92.3	0
1034003	57436	Null	Null	WRJL-FM	ROJO, INC.	C3	EVA	AL	USE	0	0	260	1	92.3	0
295637	0	RM	9268	Null		C3	ANNISTON	AL	USE	0	0	261	0	94.7	0
299970	0	RM	9268	Null		A	ASHLAND	AL	USE	0	0	264	3	95.6	0
292843	27455	Null	Null	WDXX	BROADSOUTH COMMUNICATIONS, INC.	C2	SELMA	AL	USE	0	0	261	0	118.3	0
1504231	27455	BPH	20120727AHA	WDXX	BROADSOUTH COMMUNICATIONS, INC.	C2	SELMA	AL	CP	50	199.3	261	0	123.2	0



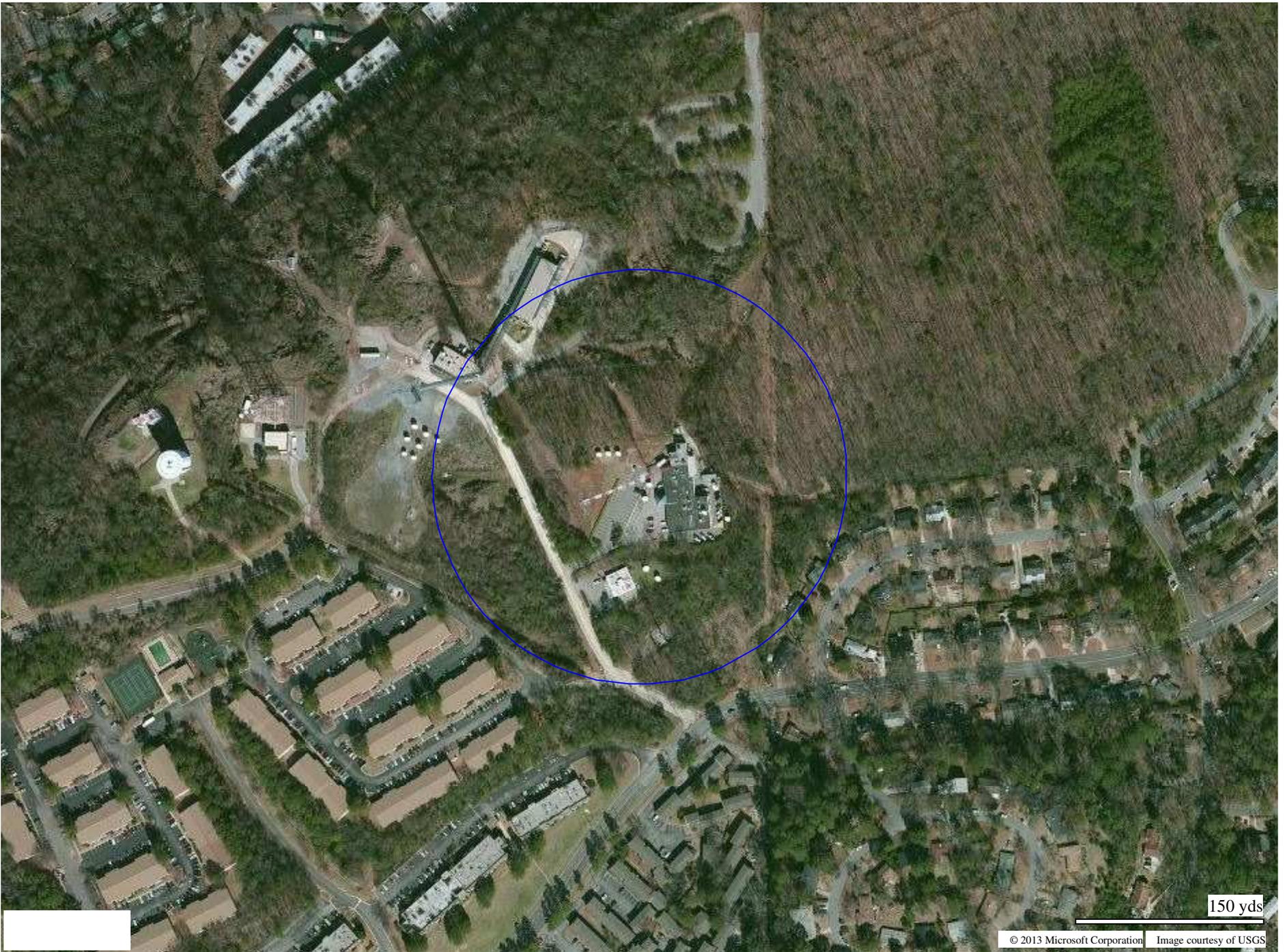
Facility id: 150818;
 Area of Interference;



Google earth

feet
meters





150 yds