

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 147419

Channel 248

### **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 $\mu$  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 dB $\mu$  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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
273169	BLH19980825KB	WSRV	93	92.7
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>92.7</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 **92.7 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **132.7 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **7.1 m** from the transmit antenna.

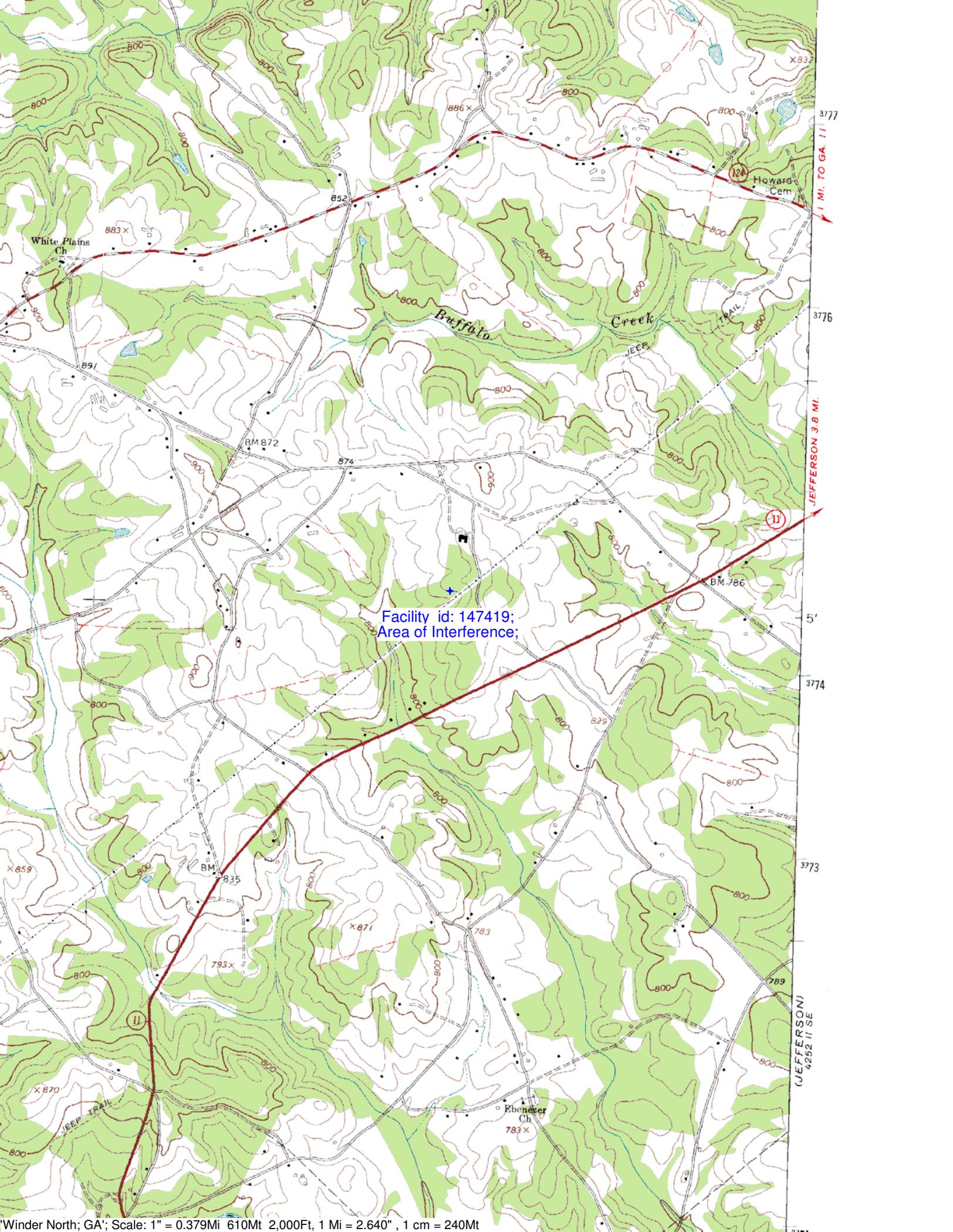
The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population"). 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:** NIC  
**Antenna Model:** BKG77  
**CORAGL:** 78 m  
**Maximum ERP:** 0.019 kW  
**Interfering Contour:** 132.7 dB $\mu$   
**Max Int. Contour Distance:** 7.1 m

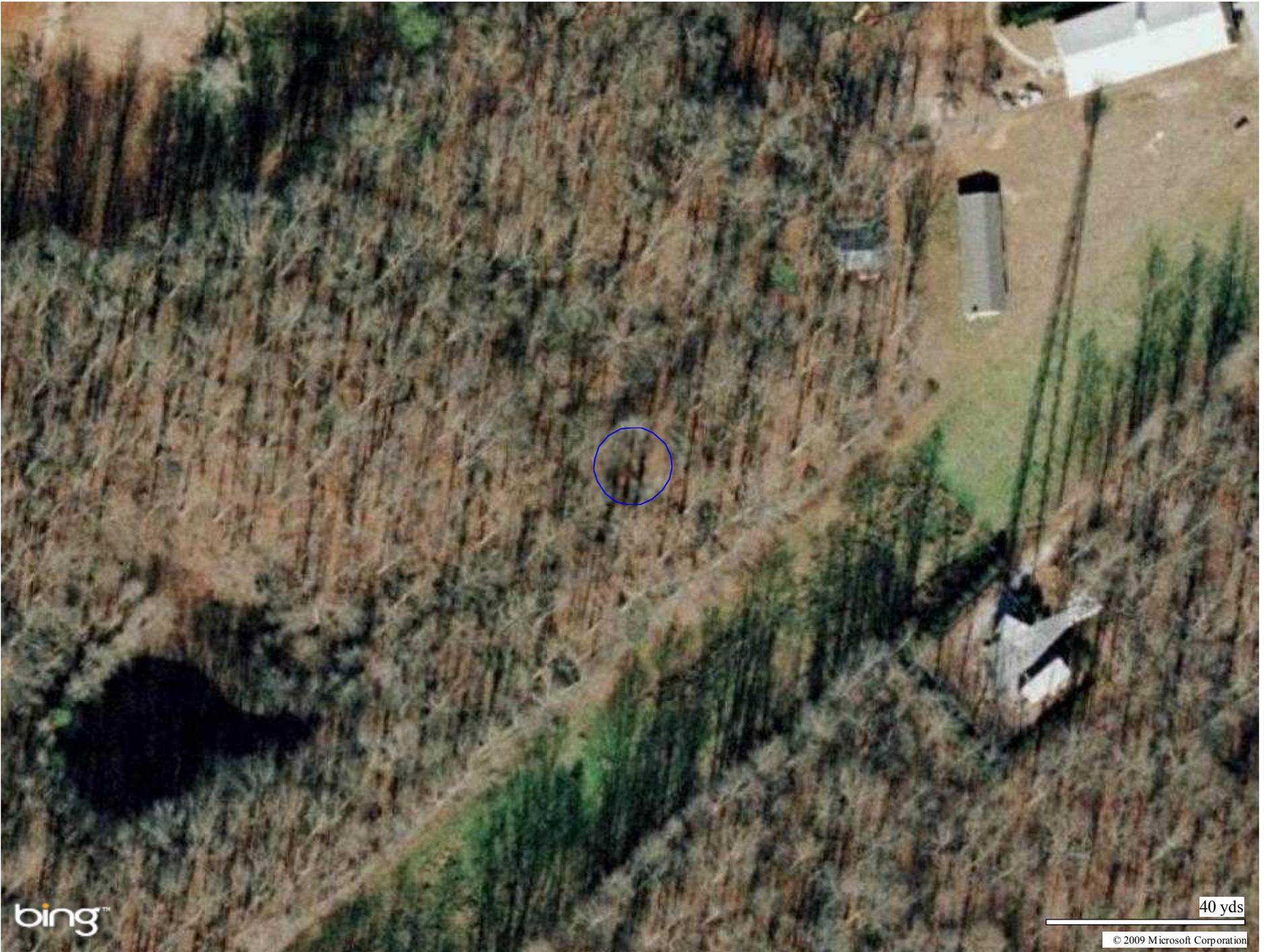
**Adjacent Channel Study  
For Station W248AG, Facility\_id: 147419**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
273169	59970	BLH	19980825KB	WSRV	COX RADIO, INC.	C	GAINESVILLE	GA	LIC	98	797	246	2	20.2	0.1134
249415	59970	BLH	19970703KD	WSRV	COX RADIO, INC.	C	GAINESVILLE	GA	LIC	98	654	246	2	20.2	0.1134
1104884	59970	BXLH	20060109ACS	WSRV	COX RADIO, INC.	C	GAINESVILLE	GA	LIC	50	506	246	2	21.3	0.1134
1168492	59970	BPH	20070118ACV	WSRV	COX RADIO, INC.	C0	GAINESVILLE	GA	APP	100	634	246	2	34.7	0.1134
208803	22988	BLFT	19950505TH	W250AC	GEORGIA PUBLIC TELECOMMUNICATIONS COI	D	ATHENS	GA	LIC	0.027	277	250	2	29.1	0
628643	138389	BNPFT	20030310ADB	NEW	AUGUSTA RADIO FELLOWSHIP INSTITUTE, INC	D	GAINESVILLE	GA	APP	0.019	430	248	0	31.7	0
639042	146456	BNPFT	20030314AIA	NEW	COMMUNITY PUBLIC RADIO, INC.	D	CUMMING	GA	APP	0.01	549	248	0	49.9	0
1358547	151910	BMPFT	20100301ABN	W249CC	TUGART PROPERTIES, LLC	D	TOCCOA	GA	CP MOD	0.25	550	249	1	55.3	0
1293769	151910	BLFT	20090206AFA	W249CC	TUGART PROPERTIES, LLC	D	TOCCOA	GA	LIC	0.25	568	249	1	55.4	0
1304393	158597	BLFT	20090416AVM	W250BC	CUMULUS LICENSING LLC	D	RIVERDALE	GA	LIC	0.25	588	250	2	71	0
270482	5971	BLH	19980629KB	WHZT	COX RADIO, INC.	C0	SENECA	SC	LIC	100	554	251	3	90.3	0
422206	41993	BLH	19991018ABS	WMGZ	SOUTHERN STONE BROADCASTING, INC.	C3	EATONTON	GA	LIC	8.5	315	249	1	90.8	0
1262916	41993	BPH	20070416ACV	WMGZ	SOUTHERN STONE BROADCASTING, INC.	C2	WASHINGTON	GA	APP	50	238	249	1	93.9	0
614509	3105	BMLH	20021031ABB	WUMJ	ROA LICENSES, LLC	C3	FAYETTEVILLE	GA	LIC	7.9	448	248	0	108.9	0



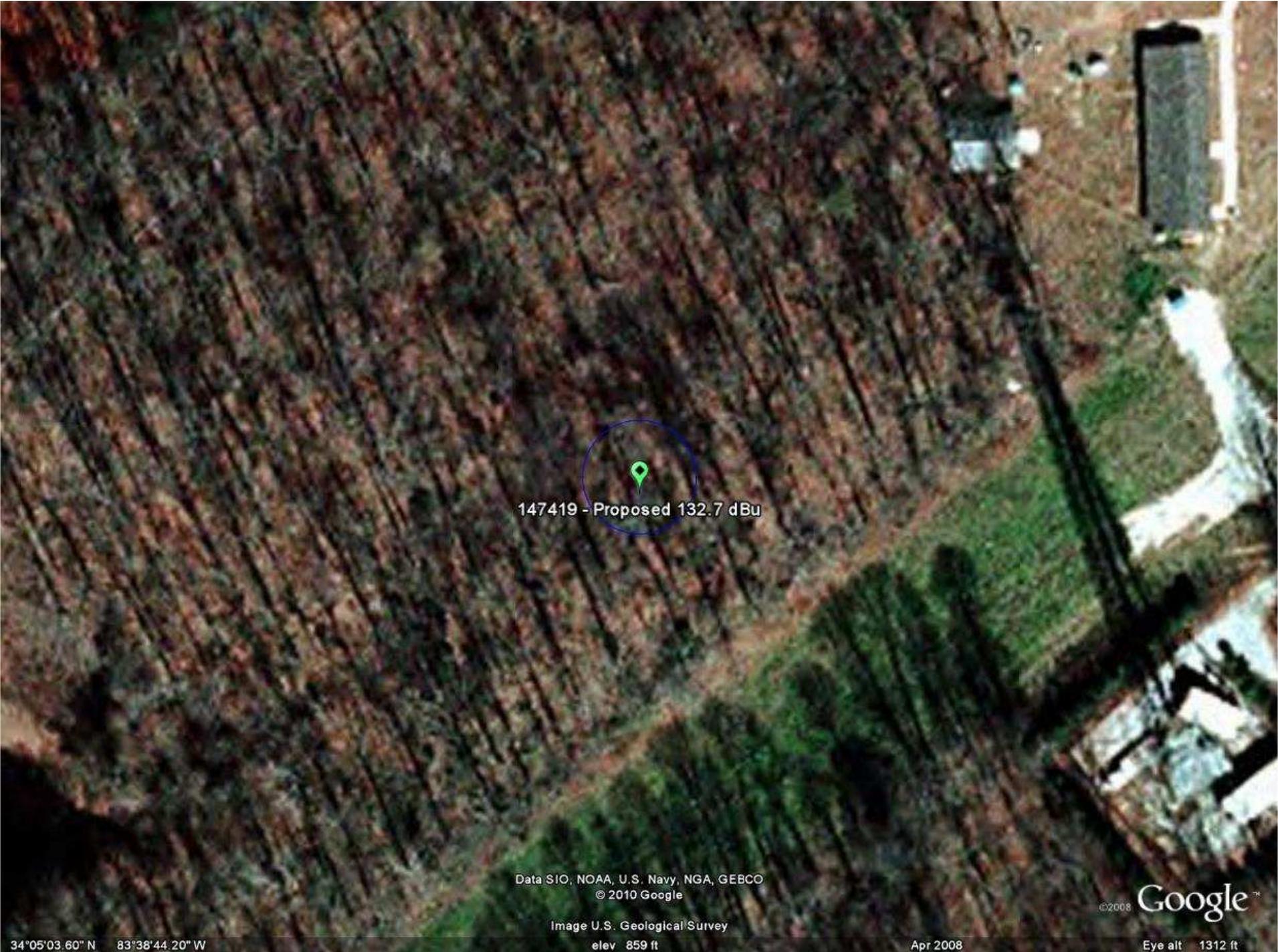
Facility id: 147419;  
Area of Interference;



bing™

40 yds

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147419 - Proposed 132.7 dBu

Data SIO, NOAA, U.S. Navy, NGA, GEBCO  
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Image U.S. Geological Survey  
elev 859 ft

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34°05'03.60" N 83°38'44.20" W

Apr 2008

Eye alt 1312 ft