

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 148566

Channel 267

### **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.

Pages 4 through 6 include a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 7 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 CDDB 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 8 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 9 of this exhibit is an aerial photo of the vicinity surrounding the proposed translator's tower site.

**Note: The tallest building within the zone of interference is less than 20 ft (6.1m) in height. This proposal provides 15.4m (50.5ft) of ground clearance, 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 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
597108	BLH20020308AAT	WBEI	64.1	64.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour <b>64.1</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 **64.1 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **104.1 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **684.8 m** from the transmit antenna.

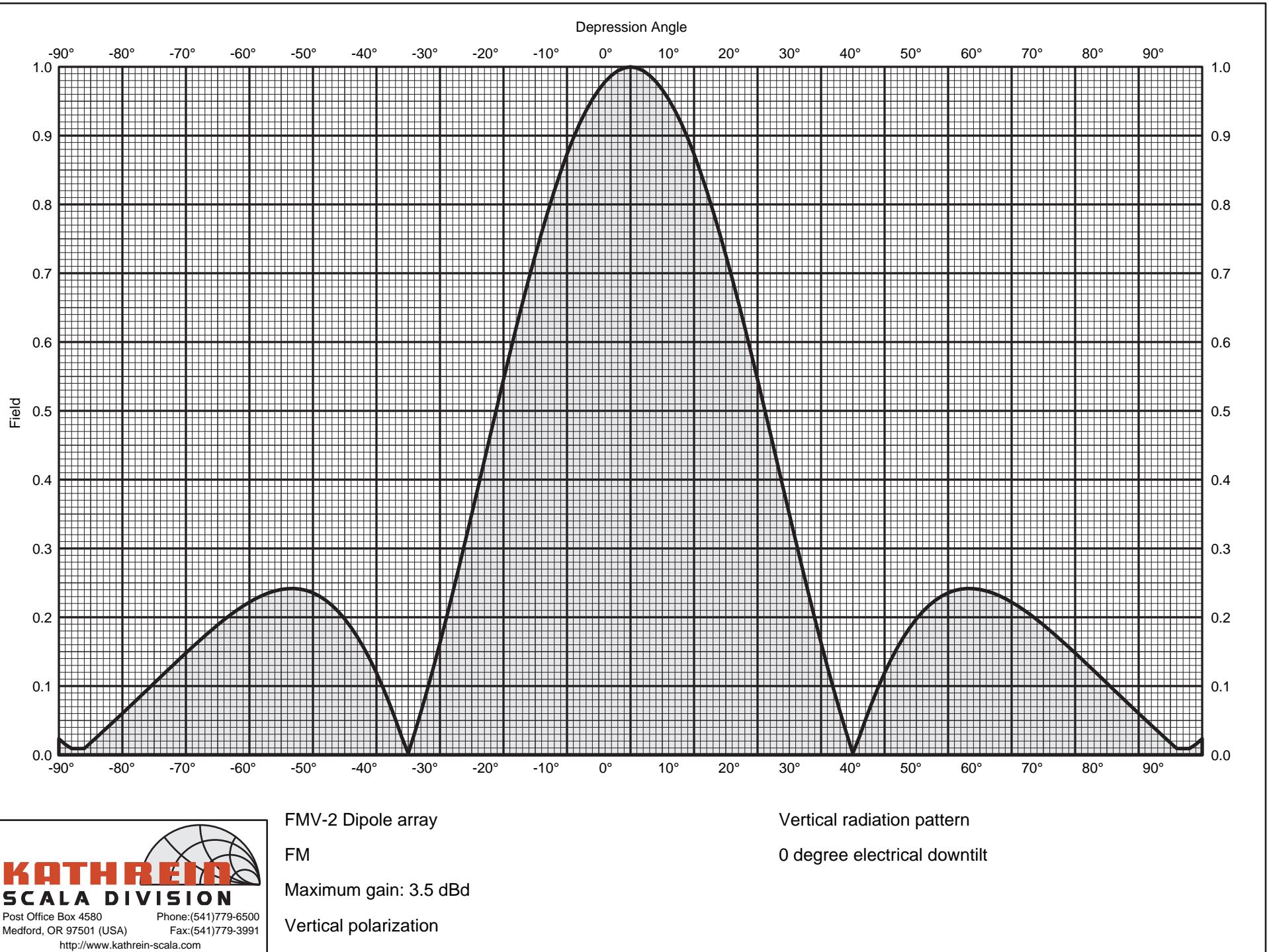
The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative 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 **15.4 m** 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.

**Note: The tallest building within the zone of interference is less than 20 ft (6.1m) in height. This proposal provides 15.4m (50.5ft) of ground clearance, 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:	SCA
Antenna Model:	FMV-2
CORAGL:	150 m
Maximum ERP:	0.245 kW
Interfering Contour:	104.1 dB $\mu$
Max Int. Contour Distance:	684.8 m
Min Ground Clearance:	15.4 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	.967	229.1	662.2	659.7	92.3
10	.873	186.7	597.9	588.8	46.2
15	.726	129.1	497.2	480.2	21.3
20	.545	72.8	373.2	350.7	22.3
25	.350	30.0	239.7	217.2	48.7
30	.163	6.5	111.6	96.7	94.2
35	.010	0.0	6.8	5.6	146.1
40	.119	3.5	81.5	62.4	97.6
45	.198	9.6	135.6	95.9	54.1
50	.235	13.5	160.9	103.4	26.7
55	.240	14.1	164.4	94.3	15.4
60	.222	12.1	152.0	76.0	18.3
65	.189	8.8	129.4	54.7	32.7
70	.148	5.4	101.4	34.7	54.8
75	.104	2.6	71.2	18.4	81.2
80	.060	0.9	41.1	7.1	109.5
85	.018	0.1	12.3	1.1	137.7
90	.023	0.1	15.8	0.0	134.2

Minimum Clearance above TGL: **15.4 m**





FMV-2 Dipole array

FM

Maximum gain: 3.5 dBd

Vertical polarization

Vertical radiation pattern  
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
-90	0.023	-32.64	-29.14	0.00	-45	0.198	-14.09	-10.59	0.09
-89	0.015	-36.31	-32.81	0.00	-44	0.185	-14.64	-11.14	0.08
-88	0.010	-40.00	-36.50	0.00	-43	0.171	-15.32	-11.82	0.07
-87	0.010	-40.00	-36.50	0.00	-42	0.156	-16.15	-12.65	0.05
-86	0.010	-40.00	-36.50	0.00	-41	0.138	-17.18	-13.68	0.04
-85	0.018	-35.09	-31.59	0.00	-40	0.119	-18.47	-14.97	0.03
-84	0.026	-31.71	-28.21	0.00	-39	0.098	-20.14	-16.64	0.02
-83	0.035	-29.24	-25.74	0.00	-38	0.076	-22.41	-18.91	0.01
-82	0.043	-27.33	-23.83	0.00	-37	0.051	-25.78	-22.28	0.01
-81	0.052	-25.74	-22.24	0.01	-36	0.025	-31.91	-28.41	0.00
-80	0.060	-24.40	-20.90	0.01	-35	0.010	-40.00	-36.50	0.00
-79	0.069	-23.22	-19.72	0.01	-34	0.032	-30.02	-26.52	0.00
-78	0.078	-22.19	-18.69	0.01	-33	0.062	-24.11	-20.61	0.01
-77	0.087	-21.25	-17.75	0.02	-32	0.094	-20.49	-16.99	0.02
-76	0.095	-20.42	-16.92	0.02	-31	0.128	-17.86	-14.36	0.04
-75	0.104	-19.64	-16.14	0.02	-30	0.163	-15.77	-12.27	0.06
-74	0.113	-18.93	-15.43	0.03	-29	0.199	-14.04	-10.54	0.09
-73	0.122	-18.28	-14.78	0.03	-28	0.235	-12.56	-9.06	0.12
-72	0.131	-17.68	-14.18	0.04	-27	0.273	-11.28	-7.78	0.17
-71	0.139	-17.11	-13.61	0.04	-26	0.311	-10.14	-6.64	0.22
-70	0.148	-16.59	-13.09	0.05	-25	0.350	-9.12	-5.62	0.27
-69	0.157	-16.11	-12.61	0.05	-24	0.389	-8.20	-4.70	0.34
-68	0.165	-15.66	-12.16	0.06	-23	0.428	-7.36	-3.86	0.41
-67	0.173	-15.23	-11.73	0.07	-22	0.468	-6.60	-3.10	0.49
-66	0.181	-14.85	-11.35	0.07	-21	0.507	-5.91	-2.41	0.57
-65	0.189	-14.47	-10.97	0.08	-20	0.545	-5.26	-1.76	0.67
-64	0.196	-14.14	-10.64	0.09	-19	0.584	-4.68	-1.18	0.76
-63	0.204	-13.83	-10.33	0.09	-18	0.621	-4.14	-0.64	0.86
-62	0.210	-13.55	-10.05	0.10	-17	0.657	-3.65	-0.15	0.97
-61	0.216	-13.30	-9.80	0.10	-16	0.693	-3.19	0.31	1.07
-60	0.222	-13.08	-9.58	0.11	-15	0.726	-2.78	0.72	1.18
-59	0.227	-12.87	-9.37	0.12	-14	0.759	-2.40	1.10	1.29
-58	0.232	-12.71	-9.21	0.12	-13	0.790	-2.05	1.45	1.40
-57	0.235	-12.57	-9.07	0.12	-12	0.820	-1.73	1.77	1.50
-56	0.238	-12.46	-8.96	0.13	-11	0.847	-1.44	2.06	1.61
-55	0.240	-12.38	-8.88	0.13	-10	0.873	-1.18	2.32	1.71
-54	0.241	-12.34	-8.84	0.13	-9	0.896	-0.95	2.55	1.80
-53	0.242	-12.33	-8.83	0.13	-8	0.918	-0.74	2.76	1.89
-52	0.241	-12.37	-8.87	0.13	-7	0.936	-0.57	2.93	1.96
-51	0.239	-12.44	-8.94	0.13	-6	0.953	-0.42	3.08	2.03
-50	0.235	-12.56	-9.06	0.12	-5	0.967	-0.29	3.21	2.09
-49	0.231	-12.74	-9.24	0.12	-4	0.978	-0.19	3.31	2.14
-48	0.225	-12.97	-9.47	0.11	-3	0.988	-0.11	3.39	2.18
-47	0.217	-13.26	-9.76	0.11	-2	0.994	-0.05	3.45	2.21
-46	0.208	-13.63	-10.13	0.10	-1	0.998	-0.01	3.49	2.23
					0	1.000	0.00	3.50	2.24



FMV-2 Dipole array

FM

Maximum gain: 3.5 dBd

Vertical polarization

Vertical radiation pattern  
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
0	1.000	0.00	3.50	2.24	45	0.198	-14.09	-10.59	0.09
1	0.998	-0.01	3.49	2.23	46	0.208	-13.63	-10.13	0.10
2	0.994	-0.05	3.45	2.21	47	0.217	-13.26	-9.76	0.11
3	0.988	-0.11	3.39	2.18	48	0.225	-12.97	-9.47	0.11
4	0.978	-0.19	3.31	2.14	49	0.231	-12.74	-9.24	0.12
5	0.967	-0.29	3.21	2.09	50	0.235	-12.56	-9.06	0.12
6	0.953	-0.42	3.08	2.03	51	0.239	-12.44	-8.94	0.13
7	0.936	-0.57	2.93	1.96	52	0.241	-12.37	-8.87	0.13
8	0.918	-0.74	2.76	1.89	53	0.242	-12.33	-8.83	0.13
9	0.896	-0.95	2.55	1.80	54	0.241	-12.34	-8.84	0.13
10	0.873	-1.18	2.32	1.71	55	0.240	-12.38	-8.88	0.13
11	0.847	-1.44	2.06	1.61	56	0.238	-12.46	-8.96	0.13
12	0.820	-1.73	1.77	1.50	57	0.235	-12.57	-9.07	0.12
13	0.790	-2.05	1.45	1.40	58	0.232	-12.71	-9.21	0.12
14	0.759	-2.40	1.10	1.29	59	0.227	-12.87	-9.37	0.12
15	0.726	-2.78	0.72	1.18	60	0.222	-13.08	-9.58	0.11
16	0.693	-3.19	0.31	1.07	61	0.216	-13.30	-9.80	0.10
17	0.657	-3.65	-0.15	0.97	62	0.210	-13.55	-10.05	0.10
18	0.621	-4.14	-0.64	0.86	63	0.204	-13.83	-10.33	0.09
19	0.584	-4.68	-1.18	0.76	64	0.196	-14.14	-10.64	0.09
20	0.545	-5.26	-1.76	0.67	65	0.189	-14.47	-10.97	0.08
21	0.507	-5.91	-2.41	0.57	66	0.181	-14.85	-11.35	0.07
22	0.468	-6.60	-3.10	0.49	67	0.173	-15.23	-11.73	0.07
23	0.428	-7.36	-3.86	0.41	68	0.165	-15.66	-12.16	0.06
24	0.389	-8.20	-4.70	0.34	69	0.157	-16.11	-12.61	0.05
25	0.350	-9.12	-5.62	0.27	70	0.148	-16.59	-13.09	0.05
26	0.311	-10.14	-6.64	0.22	71	0.139	-17.11	-13.61	0.04
27	0.273	-11.28	-7.78	0.17	72	0.131	-17.69	-14.19	0.04
28	0.235	-12.56	-9.06	0.12	73	0.122	-18.28	-14.78	0.03
29	0.199	-14.04	-10.54	0.09	74	0.113	-18.93	-15.43	0.03
30	0.163	-15.77	-12.27	0.06	75	0.104	-19.64	-16.14	0.02
31	0.128	-17.86	-14.36	0.04	76	0.095	-20.42	-16.92	0.02
32	0.095	-20.49	-16.99	0.02	77	0.087	-21.25	-17.75	0.02
33	0.062	-24.11	-20.61	0.01	78	0.078	-22.19	-18.69	0.01
34	0.032	-30.02	-26.52	0.00	79	0.069	-23.22	-19.72	0.01
35	0.010	-40.00	-36.50	0.00	80	0.060	-24.40	-20.90	0.01
36	0.025	-31.91	-28.41	0.00	81	0.052	-25.74	-22.24	0.01
37	0.051	-25.78	-22.28	0.01	82	0.043	-27.33	-23.83	0.00
38	0.076	-22.41	-18.91	0.01	83	0.035	-29.24	-25.74	0.00
39	0.098	-20.14	-16.64	0.02	84	0.026	-31.71	-28.21	0.00
40	0.119	-18.47	-14.97	0.03	85	0.018	-35.09	-31.59	0.00
41	0.138	-17.18	-13.68	0.04	86	0.010	-40.00	-36.50	0.00
42	0.156	-16.15	-12.65	0.05	87	0.010	-40.00	-36.50	0.00
43	0.171	-15.32	-11.82	0.07	88	0.010	-40.00	-36.50	0.00
44	0.185	-14.64	-11.14	0.08	89	0.015	-36.31	-32.81	0.00
					90	0.023	-32.64	-29.14	0.00

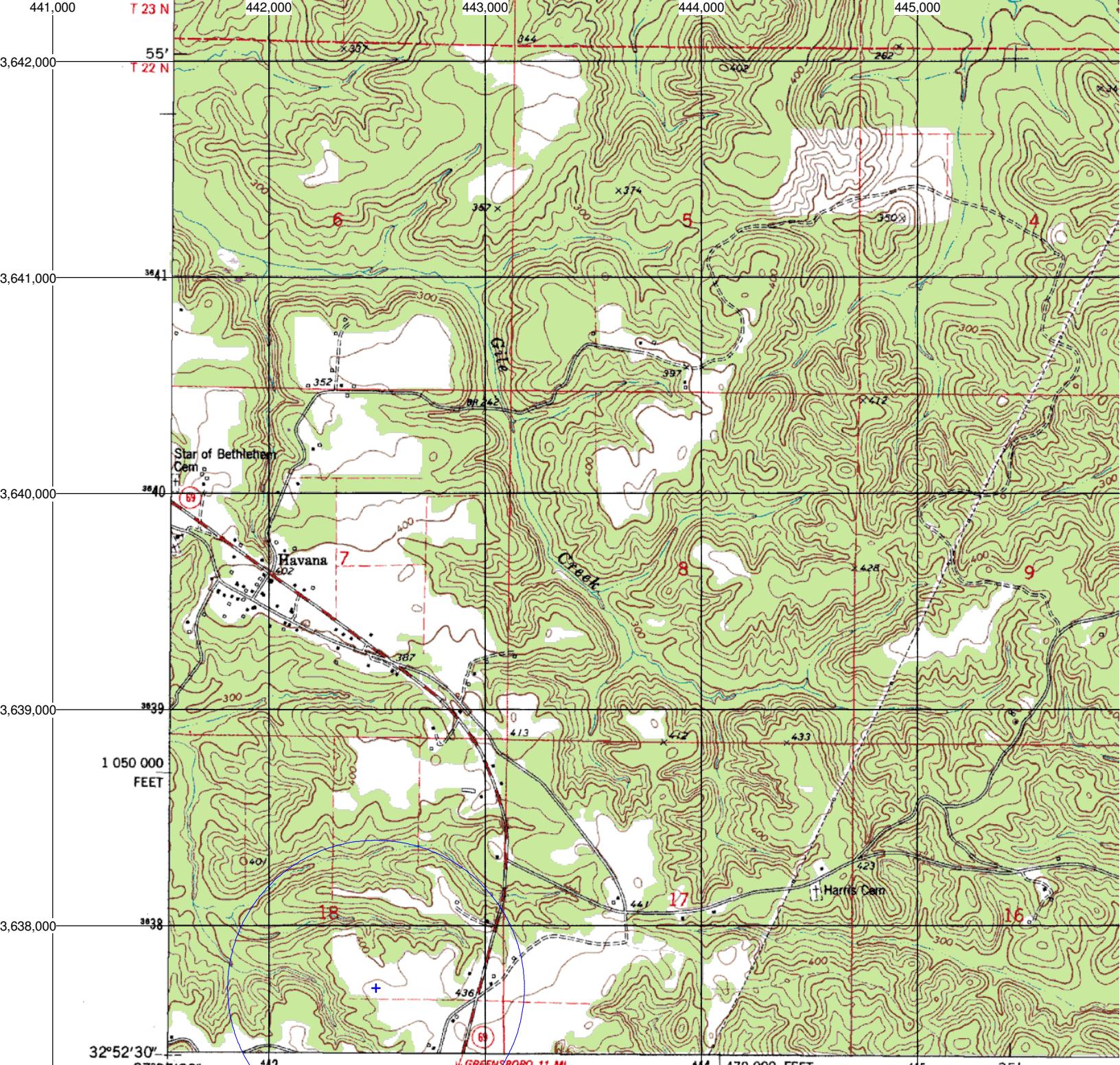
**Adjacent Channel Study**  
**For Station W268BF, Facility\_id: 148566**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
597108	67577	BLH	20020308AAT	WBEI	RADIO LICENSE HOLDING CBC, LLC	C2	REFORM	AL	LIC	22.5	309	269	2	44.8	1.462
152016	950	BLH	19900830KA	WALX	SCOTT COMMUNICATIONS, INC.	C2	SELMA	AL	LIC	3	152	265	2	69.2	0
641167	148352	BNPFT	20030317CTT	NEW	RADIO ASSIST MINISTRY, INC.	D	SELMA	AL	APP	0.013	151	268	1	75	0
1414853	151004	BPFT	20101122AAF	W212CB	EDGEWATER BROADCASTING, INC.	D	YORK	AL	CP	0.08	103	265	2	87.4	0
1290723	950	BLH	20090130AAJ	WALX	SCOTT COMMUNICATIONS, INC.	C2	ORRVILLE	AL	LIC	50	202	265	2	90	0
1102133	41641	BLED	20051201BVO	WQEM	GLEN IRIS BAPTIST SCHOOL	A	COLUMBIANA	AL	LIC	1.8	365	268	1	92.5	0
1332546	150814	BLFT	20090904ADA	W268BM	WILLIAM NEECK	D	JASPER	AL	LIC	0.25	241	268	1	110.8	0
937028	7067	BMLH	20040112ADF	WMSO	CC LICENSES, LLC	C1	MERIDIAN	MS	LIC	100	301	267	0	119	0
990977	6194	BLH	20040513AAR	WKBB	TELESOUTH COMMUNICATIONS, INC.	C3	WEST POINT	MS	LIC	10	231.6	265	2	142	0
1327715	6194	BPH	20090612AJR	WKBB	TELESOUTH COMMUNICATIONS, INC.	C2	MANTEE	MS	CP	47	230	265	2	142	0
1174980	66910	BMLH	20070402ADP	WHHY-FM	CUMULUS LICENSING LLC	C0	MONTGOMERY	AL	LIC	100	397	270	3	142.9	0
628532	70452	BLH	20030225AAB	WYDE-FM	KIMTRON, INC.	C0	CULLMAN	AL	LIC	100	615	266	1	149.3	0
1061876	70452	BXMLH	20050106AAI	WYDE-FM	KIMTRON, INC.	C0	CULLMAN	AL	LIC	100	579	266	1	149.3	0
103454	666	BLH	19870707KC	WFTA	AIR SOUTH RADIO, INC.	C2	FULTON	MS	LIC	50	247	270	3	176.3	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
1407841	4242	BLED	20101122AJA	WVUA-FM	BOARD OF TRUSTEES, UNIVERSITY OF ALABAMA	A	TUSCALOOSA	AL	LIC	0.22	133	214	53	37.4	27.4
1148207	90785	BLED	20060912AAH	WCSO	AMERICAN FAMILY ASSOCIATION	C2	COLUMBUS	MS	LIC	10	232	213	54	77.7	62.7



Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1974. Field Facility id: 148566; dated 1980.

**Area of Interference:** 10,000 ha coordinate system, west zone (transverse Mercator).

1000-meter Universal Transverse Mercator grid, zone 16  
1927 North American Datum

To place on the predicted North American Datum 1983 move the projection lines 11 meters south as shown by

There may be private inholdings within the boundaries.

**Fine red dashed lines indicate selected fence and field boundaries.**

The red dashed lines indicate selected fence and field lines where generally visible on aerial photographs. This information is unchecked.

UTM GRID AND 1983 MAGNETIC NORTH  
DECLINATION AT CENTER OF SHEET

