

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 150912

Channel 266

### **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.

**Note: The adjacent channel study indicates prohibitive co-channel overlap with W266AL, Bay Minette, AL (FIN: 150820) , BLFT-20130204ACD. W266AL has been moved and licensed in Pensacola, FL. This proposal will not interfere with W266AL in Pensacola.**

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.

**Note: The only structures within the zone of predicted interference are unoccupied communications buildings 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1068659	BLH20050627AAV	WJTQ	76.7	76.2
1218016	BLH20071106ACP	WTKX-FM	74.3	74.3

Minimum F(50,50) Contour of Adjacent Station within  
Proposed Translator's Standard Interfering Contour **74.3**

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 **74.3 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **114.3 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **213.8 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.

**Note: The only structures within the zone of predicted interference are unoccupied communications buildings 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:** NIC  
**Antenna Model:** BKG77-2(FW) @ 300°  
**CORAGL:** 160 m  
**Maximum ERP:** 0.24 kW  
**Interfering Contour:** 114.3 dB $\mu$   
**Max Int. Contour Distance:** 213.8 m

**Adjacent Channel Study  
For Station W266CM, Facility\_id: 150912**

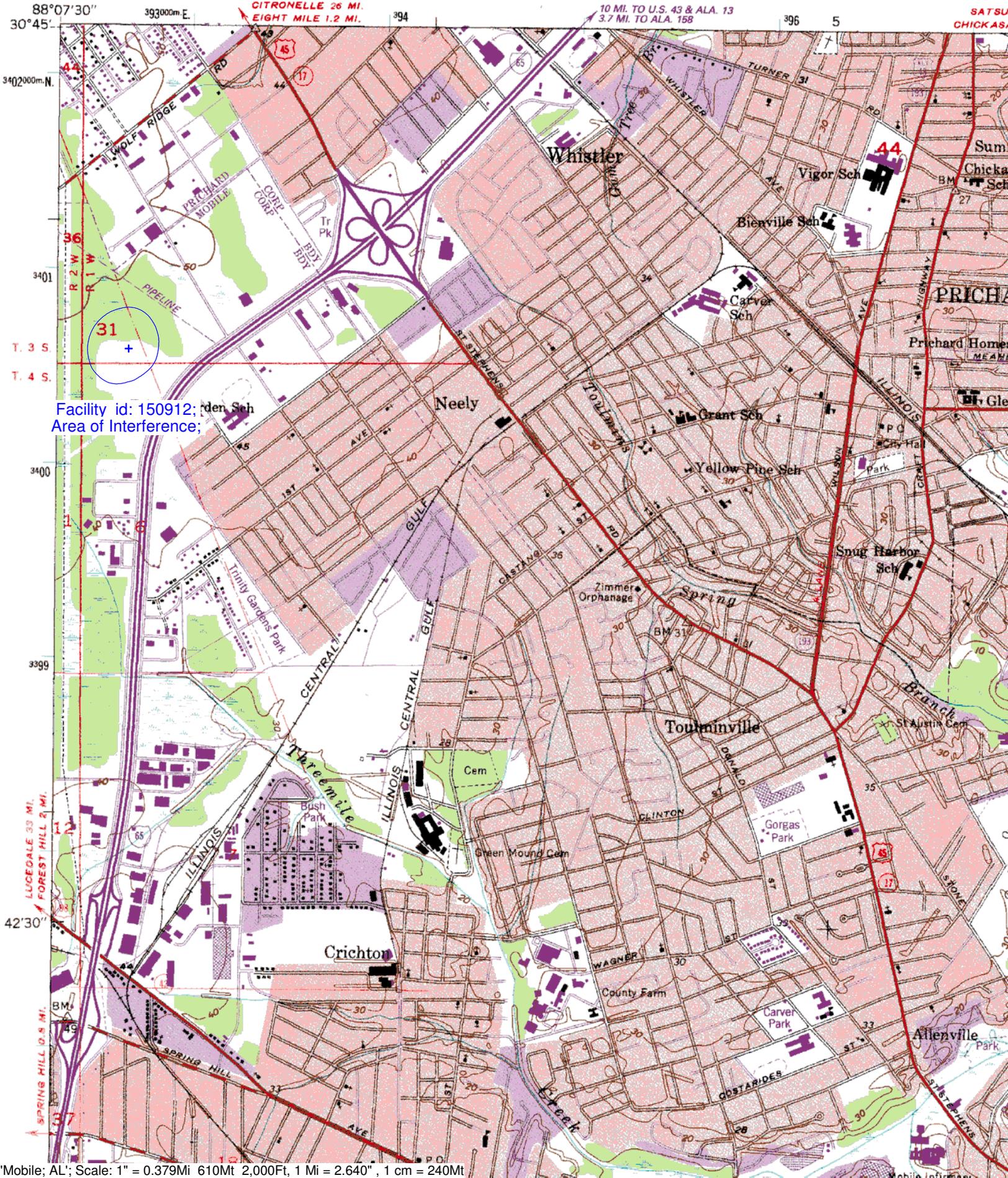
**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
1540519	150820	BLFT-20130204ACD	W266AL	EDGEWATER BROADCASTING, INC.	D	BAY MINETTE	AL	LIC	0.25	377	266	0	56.7	54.5291
1068659	12143	BLH-20050627AAV	WJTQ	CUMULUS LICENSING LLC	C	PENSACOLA	FL	LIC	98	553.4	264	2	47.5	1.1721
1218016	61243	BLH-20071106ACP	WTKX-FM	CLEAR CHANNEL BROADCASTING LICENSES, INC	C	PENSACOLA	FL	LIC	100	520	268	2	51	1.1721
1590686	195595	BNPL-20131108AKK	NEW	WASHINGTON BROADCAST EDUCATIONAL ASSOCIA	L1	LEAKESVILLE	MS	CP	0	35.9	266	0	62.6	0
1540640	150820	BPFT-20130205ACW	W266AL	EDGEWATER BROADCASTING, INC.	D	BAY MINETTE	AL	CP	0.14	96	266	0	90.9	0
542245	40901	BLH-20001218AAI	WPPG	WOLFF BROADCASTING CORPORATION	A	REPTON	AL	LIC	3.1	240	266	0	112.3	0
1419176	166067	BLH-20110302ABI	WZHL	MAGNOLIA RADIO CORPORATION	A	NEW AUGUSTA	MS	LIC	5	158	269	3	114.5	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
1313162	43198	BMLED-20090522AAR	WMAH-FM	MISSISSIPPI AUTHORITY FOR EDUCATIONAL TV	C	BILOXI	MS	LIC	100	468	212	54	78.8	49.8
191900	20474	BLED-19931115KG	WTGF	FAITH BIBLE COLLEGE, INC.	C3	MILTON	FL	LIC	24	93	213	53	96	84

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY



88°07'30"  
30°45'

393000m.E.

CITRONELLE 26 MI.  
EIGHT MILE 1.2 MI.

394

10 MI. TO U.S. 43 & ALA. 13  
3.7 MI. TO ALA. 158

396

5

SATSU  
CHICKAS

3402000m.N.

44

3401

T. 3 S.

T. 4 S.

3400

3399

42'30"

BM

Mobile; AL; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640" , 1 cm = 240Mt

