[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 140015 Channel 276

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.

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: There are no buildings or roads within the zone of predicted interference 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 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
75957	BLH19850207KK	WIOG	88.3	88.3
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			**88.3**

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 **88.3 dBµ**, this makes the proposed translator's worst-case interfering contour **128.3 dBµ.** By the free-space equation, this contour is calculated to extend a maximum of **16 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").

Note: There are no buildings or roads within the zone of predicted interference 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.

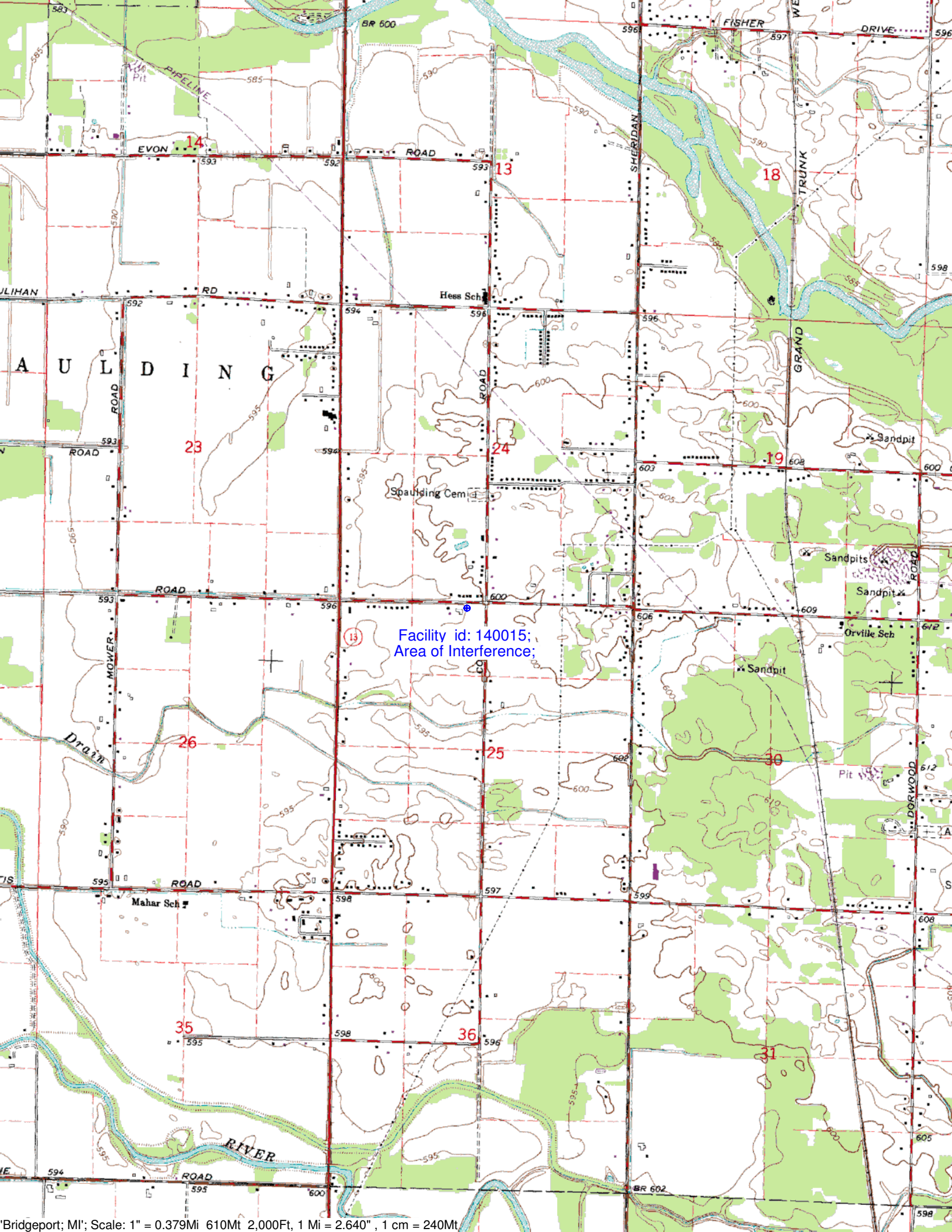
Antenna Manufacturer:	**SCA**
Antenna Model:	**FMV1**
CORAGL:	**10 m**
Maximum ERP:	**0.035 kW**
Interfering Contour:	**128.3 dBµ**
Max Int. Contour Distance:	**16 m**

Adjacent Channel Study
For Station W222CA, Facility_id: 140015

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
75957	22675	BLH-19850207KK	WIOG	RADIO LICENSE HOLDING CBC, L	B	BAY CITY	MI	LIC	86	427	273	3	17.3	0.8315
1567492	144582	BNPFT-20130823ABI	W277CM	SPIRIT COMMUNICATIONS, INC.	D	SAGINAW	MI	CP	0.015	232	277	1	10.8	0
1677913	144582	BMPFT-20150511ABI	W277CM	SPIRIT COMMUNICATIONS, INC.	D	SAGINAW	MI	APP	0.03	256	278	2	15.6	0
1101646	14224	BLH-20051130AIO	WQUS	TOWNSQUARE MEDIA OF FLINT,	A	LAPEER	MI	LIC	2.6	365	276	0	67.6	0
1502500	184971	BNPED-20100226AG	NEW	HUBBARDSTON COMMUNITY RA	A	HUBBARDSTON	MI	CP	6	325	279	3	77	0
1494616	2484	BMLH-20120515AAB	WGDN-FM	APPLE BROADCASTING COMPAI	C3	GLADWIN	MI	LIC	11.5	398	276	0	84.2	0
1049411	30944	BLH-20050421ABP	WCZE	JENNIFER & EDWARD CZELADA	C2	HARBOR BEACH	MI	LIC	43	393	279	3	86	0
1670768	73298	BMLH-20150210AAQ	WMUZ	WMUZ RADIO, INC.	B	DETROIT	MI	LIC	50	336	278	2	121	0
84461	73298	BLH-19851223KG	WMUZ	WMUZ RADIO, INC.	B	DETROIT	MI	LIC	50	336	278	2	121	0
1423049	41080	BLH-20110408AAK	WWWW-FM	CUMULUS LICENSING LLC	B	ANN ARBOR	MI	LIC	50	406.2	275	1	121.5	0
498070	54915	BMLH-20000512AAD	WPZR	RADIO ONE OF DETROIT, LLC	B	MOUNT CLEMENS	MI	LIC	50	337	274	2	122.4	0

Prepared by Gene Wisniewski
May 15, 2015



'Bridgeport; MI'; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640" , 1 cm = 240Mt


Moore Rd
W Moore Rd
Cole Rd
Cole Rd
50 yds
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