

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 147937

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 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.

Page 4 includes a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 5 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 6 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 7 of this exhibit is an aerial photo of the vicinity surrounding the proposed translator's tower site.

Note: The proposed transmit site is on the roof top of the tallest building (Metropolitan Life, Shell One Building) in downtown New Orleans which is listed as 212m. The antenna is mounted on a pole on the roof. This application provides 221.1m of ground clearance which is 9.1m above the top of the roof. The zone of predicted interference is 4.2m and is directly above the building; therefore, 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.

<u>Application_id</u>	<u>File Number</u>	<u>Callsign</u>	<u>Contour at Tower</u>	<u>Min. Contour</u>
981718	BMLH20031124APH	WEZB	108.5	108.5
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			108.5

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 **108.5 dBμ**, this makes the proposed translator's worst-case interfering contour **148.5 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **4.2 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 6 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 **221.1 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 proposed transmit site is on the roof top of the tallest building (Metropolitan Life, Shell One Building) in downtown New Orleans which is listed as 212m. The antenna is mounted on a pole on the roof. This application provides 221.1m of ground clearance which is 9.1m above the top of the roof. The zone of predicted interference is 4.2m and is directly above the building; therefore, 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:	223 m
Maximum ERP:	0.25 kW
Interfering Contour:	148.5 dBμ
Max Int. Contour Distance:	4.2 m
Min Ground Clearance:	221.1 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	.999	249.5	4.2	4.1	222.6
10	.982	241.1	4.1	4.0	222.3
15	.954	227.5	4.0	3.8	222.0
20	.918	210.7	3.8	3.6	221.7
25	.871	189.7	3.6	3.3	221.5
30	.818	167.3	3.4	3.0	221.3
35	.758	143.6	3.2	2.6	221.2
40	.691	119.4	2.9	2.2	221.1
45	.616	94.9	2.6	1.8	221.2
50	.538	72.4	2.2	1.4	221.3
55	.465	54.1	1.9	1.1	221.4
60	.391	38.2	1.6	0.8	221.6
65	.313	24.5	1.3	0.6	221.8
70	.239	14.3	1.0	0.3	222.1
75	.176	7.7	0.7	0.2	222.3
80	.128	4.1	0.5	0.1	222.5
85	.103	2.7	0.4	0.0	222.6
90	.105	2.8	0.4	0.0	222.6
Minimum Clearance above TGL:					221.1 m



BKO77

Vertical	-66	0.297	54	0.479	174	0.468
Values	-63	0.345	57	0.436	177	0.479
-180	0.487	-60	0.391	60	0.391	
-177	0.478	-57	0.436	63	0.345	
-174	0.467	-54	0.479	66	0.297	
-171	0.460	-51	0.523	69	0.253	
-168	0.454	-48	0.568	72	0.211	
-165	0.447	-45	0.616	75	0.176	
-162	0.439	-42	0.661	78	0.145	
-159	0.429	-39	0.706	81	0.120	
-156	0.419	-36	0.745	84	0.105	
-153	0.402	-33	0.783	87	0.100	
-150	0.385	-30	0.818	90	0.105	
-147	0.369	-27	0.852	93	0.118	
-144	0.359	-24	0.881	96	0.134	
-141	0.350	-21	0.910	99	0.151	
-138	0.338	-18	0.934	102	0.168	
-135	0.326	-15	0.954	105	0.185	
-132	0.314	-12	0.972	108	0.202	
-129	0.303	-9	0.987	111	0.219	
-126	0.290	-6	0.999	114	0.236	
-123	0.278	-3	0.999	117	0.252	
-120	0.265	0	1.000	120	0.265	
-117	0.251	3	0.999	123	0.278	
-114	0.236	6	0.999	126	0.290	
-111	0.218	9	0.987	129	0.304	
-108	0.202	12	0.972	132	0.314	
-105	0.185	15	0.954	135	0.327	
-102	0.168	18	0.934	138	0.338	
-99	0.151	21	0.910	141	0.350	
-96	0.134	24	0.881	144	0.360	
-93	0.118	27	0.852	147	0.370	
-90	0.105	30	0.818	150	0.386	
-87	0.100	33	0.783	153	0.403	
-84	0.105	36	0.745	156	0.420	
-81	0.120	39	0.706	159	0.430	
-78	0.145	42	0.661	162	0.440	
-75	0.176	45	0.616	165	0.448	
-72	0.211	48	0.568	168	0.455	
-69	0.253	51	0.523	171	0.461	

Better than SWR

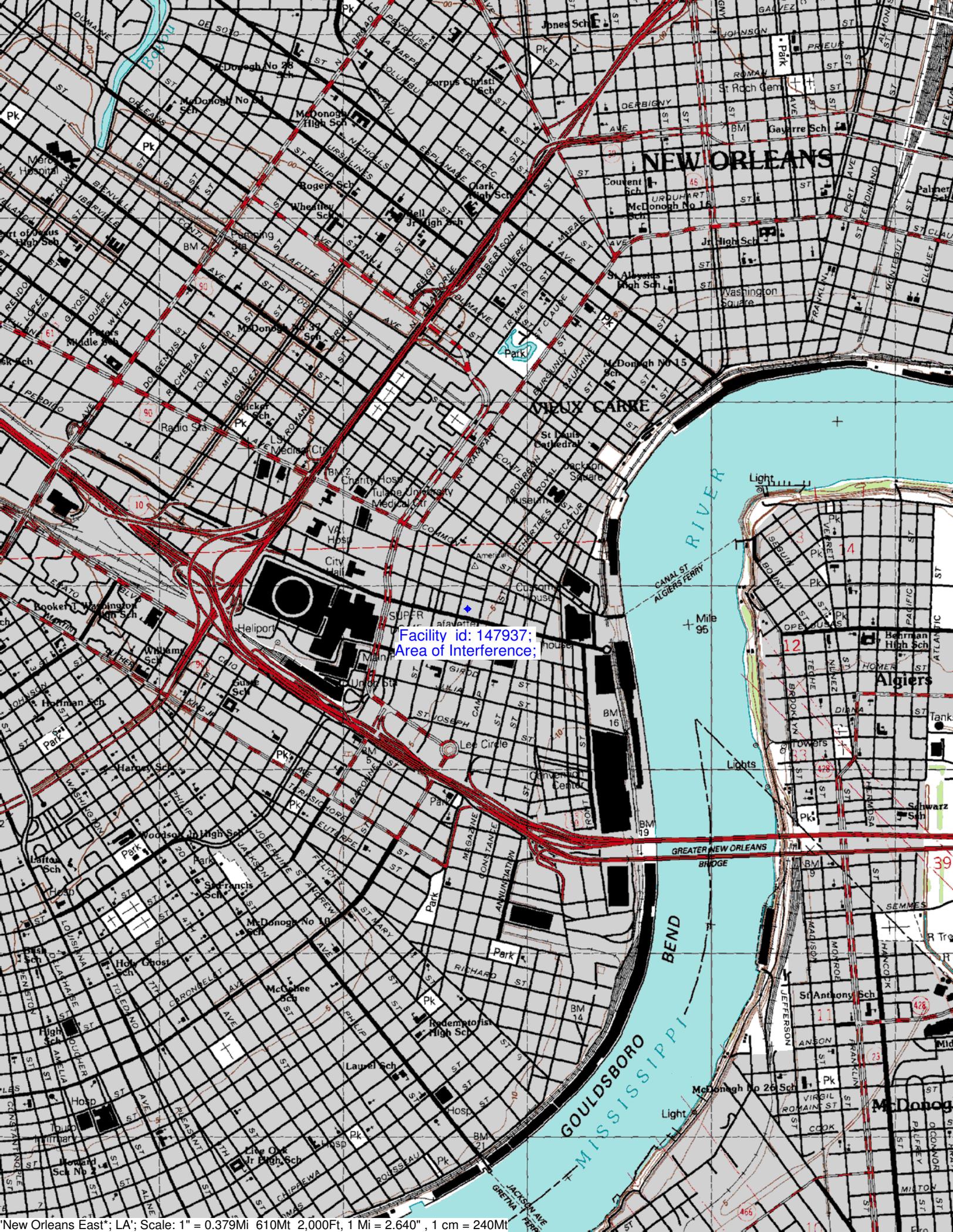
Adjacent Channel Study For Station K248BB, Facility_id: 147937

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1736812	20346	BMLH-20170105AFU	WEZB	ENTERCOM NEW ORLEANS LICE	C0	NEW ORLEANS	LA	LIC	99	300	246	2	5.6	1.4918
1755016	147981	BPFT-20170322AAB	K250BA	SPOTLIGHT BROADCASTING OF	D	SLIDELL	LA	CP	0.25	272	250	2	5.6	1.4918
1752922	147981	BLFT-20170313AAA	K250BA	SPOTLIGHT BROADCASTING OF	D	SLIDELL	LA	LIC	0.013	40	250	2	21.3	0
1522752	147948	BLFT-20121101ADX	K247BJ	SECOND LINE MEDIA, LLC	D	AMITE	LA	LIC	0.25	86	247	1	95	0
1653307	189558	BLH-20141002AAU	KDLC	COAST RADIO GROUP, INC.	C1	DULAC	LA	LIC	100	134.4	249	1	99.4	0
1355874	124170	BLL-20100210AAI	WBRJ-LP	JEFFERSON BAPTIST CHURCH, I	L1	BATON ROUGE	LA	LIC	0	40	247	1	110.3	0
1629631	72194	BMLH-20140530ALY	WCPR-FM	ALPHA MEDIA LICENSEE LLC	C2	D'IBERVILLE	MS	LIC	50	177	250	2	116.6	0
1718085	25518	BLH-20160113ABS	WDGL	GUARANTY BROADCASTING COI	C	BATON ROUGE	LA	LIC	95	465	251	3	119.1	0
1536556	141228	BLFT-20130107ABS	K249DV	EDUCATIONAL MEDIA FOUNDAT	D	BATON ROUGE	LA	LIC	0.25	175	249	1	119.8	0
289641	68658	BLH-5092	WTYL-FM	TYLERTOWN BROADCASTING C	A	TYLERTOWN	MS	LIC	3	148	249	1	131.5	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
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Facility id: 147937;
Area of Interference;

