

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 26347

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 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 5 include a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 6 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 7 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 8 of this exhibit is an aerial photo 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.

<u>Application_id</u>	<u>File Number</u>	<u>Callsign</u>	<u>Contour at Tower</u>	<u>Min. Contour</u>
1009412	BMLH20041007ACO	WVEI-FM	73.4	73.4
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>73.4</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 **73.4 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **113.4 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **237.1 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 7 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 **15.6 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.

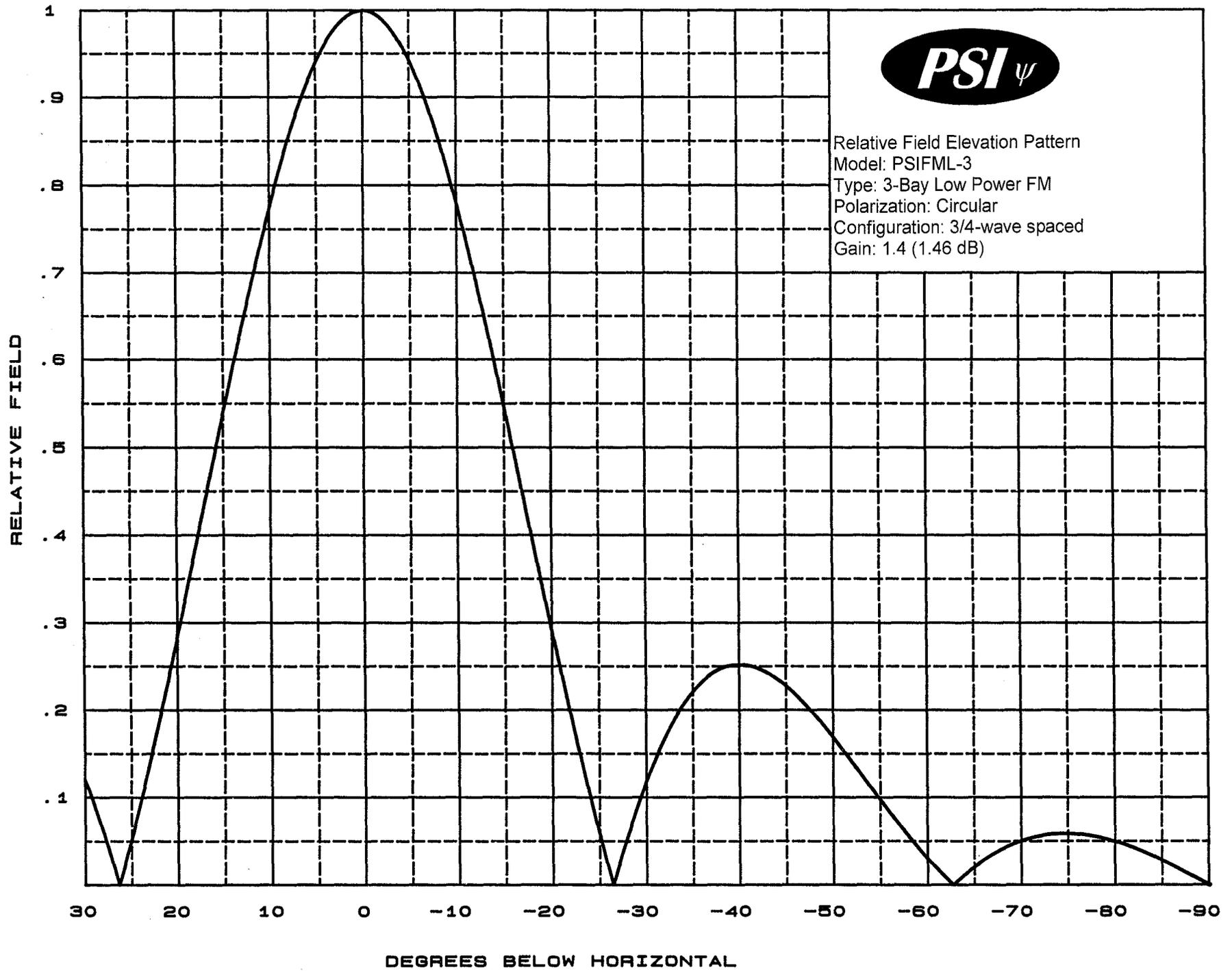
**Note: The tallest buildings within the zone of predicted interference are 20ft in height. This application provides 15.6m ground clearance so a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.**

<b>Antenna Manufacturer:</b>	<b>PSI</b>
<b>Antenna Model:</b>	<b>FML-3(.75)</b>
<b>CORAGL:</b>	<b>54 m</b>
<b>Maximum ERP:</b>	<b>0.25 kW</b>
<b>Interfering Contour:</b>	<b>113.4 dB<math>\mu</math></b>
<b>Max Int. Contour Distance:</b>	<b>237.1 m</b>
<b>Min Ground Clearance:</b>	<b>15.6 m</b>

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	.941	221.4	223.1	222.3	34.6
10	.777	150.9	184.2	181.4	22.0
15	.543	73.7	128.8	124.4	20.7
20	.287	20.6	68.1	63.9	30.7
25	.055	0.8	13.0	11.8	48.5
30	.120	3.6	28.5	24.6	39.8
35	.222	12.3	52.6	43.1	23.8
40	.252	15.9	59.8	45.8	15.6
45	.227	12.9	53.8	38.1	15.9
50	.168	7.1	39.8	25.6	23.5
55	.096	2.3	22.8	13.1	35.4
60	.030	0.2	7.1	3.6	47.8
65	.021	0.1	5.0	2.1	49.5
70	.050	0.6	11.9	4.1	42.9
75	.059	0.9	14.0	3.6	40.5
80	.050	0.6	11.9	2.1	42.3
85	.028	0.2	6.6	0.6	47.4
90	.001	0.0	0.2	0.0	53.8
Minimum Clearance above TGL:					<b>15.6 m</b>



Relative Field Elevation Pattern  
Model: PSIFML-3  
Type: 3-Bay Low Power FM  
Polarization: Circular  
Configuration: 3/4-wave spaced  
Gain: 1.4 (1.46 dB)





**Propagation Systems Inc.**  
 Elevation Pattern Tabulation  
 Antenna: PSIFML-3 Special  
 Bay spacing: 3/4 wave

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
-90.0	0.001	-60.000	-50.0	0.168	-15.500	-10.0	0.777	-2.194
-89.0	0.006	-44.795	-49.0	0.181	-14.829	-9.0	0.817	-1.761
-88.0	0.012	-38.775	-48.0	0.194	-14.240	-8.0	0.853	-1.379
-87.0	0.017	-35.329	-47.0	0.206	-13.714	-7.0	0.886	-1.049
-86.0	0.023	-32.869	-46.0	0.217	-13.266	-6.0	0.916	-0.766
-85.0	0.028	-31.047	-45.0	0.227	-12.881	-5.0	0.941	-0.529
-84.0	0.033	-29.622	-44.0	0.235	-12.562	-4.0	0.962	-0.338
-83.0	0.038	-28.467	-43.0	0.242	-12.308	-3.0	0.978	-0.190
-82.0	0.042	-27.510	-42.0	0.248	-12.126	-2.0	0.990	-0.085
-81.0	0.046	-26.705	-41.0	0.251	-12.010	-1.0	0.998	-0.021
-80.0	0.050	-26.073	-40.0	0.252	-11.968	0.0	1.000	0.000
-79.0	0.053	-25.559	-39.0	0.251	-12.004	1.0	0.998	-0.021
-78.0	0.055	-25.169	-38.0	0.248	-12.126	2.0	0.990	-0.085
-77.0	0.057	-24.887	-37.0	0.242	-12.336	3.0	0.978	-0.190
-76.0	0.058	-24.682	-36.0	0.233	-12.657	4.0	0.962	-0.338
-75.0	0.059	-24.614	-35.0	0.222	-13.092	5.0	0.941	-0.529
-74.0	0.059	-24.637	-34.0	0.207	-13.676	6.0	0.916	-0.766
-73.0	0.058	-24.772	-33.0	0.190	-14.432	7.0	0.886	-1.049
-72.0	0.056	-25.027	-32.0	0.170	-15.414	8.0	0.853	-1.379
-71.0	0.054	-25.411	-31.0	0.146	-16.700	9.0	0.817	-1.759
-70.0	0.050	-25.968	-30.0	0.120	-18.427	10.0	0.777	-2.194
-69.0	0.046	-26.733	-29.0	0.090	-20.871	11.0	0.734	-2.683
-68.0	0.041	-27.731	-28.0	0.058	-24.704	12.0	0.689	-3.233
-67.0	0.035	-29.081	-27.0	0.023	-32.754	13.0	0.642	-3.848
-66.0	0.028	-30.954	-26.0	0.015	-36.745	14.0	0.593	-4.534
-65.0	0.021	-33.656	-25.0	0.055	-25.217	15.0	0.543	-5.301
-64.0	0.012	-38.221	-24.0	0.098	-20.213	16.0	0.492	-6.156
-63.0	0.003	-50.816	-23.0	0.142	-16.928	17.0	0.441	-7.116
-62.0	0.007	-42.949	-22.0	0.189	-14.460	18.0	0.389	-8.196
-61.0	0.018	-34.880	-21.0	0.238	-12.484	19.0	0.338	-9.425
-60.0	0.030	-30.546	-20.0	0.287	-10.839	20.0	0.287	-10.834
-59.0	0.042	-27.541	-19.0	0.338	-9.425	21.0	0.238	-12.484
-58.0	0.055	-25.217	-18.0	0.389	-8.199	22.0	0.189	-14.460
-57.0	0.068	-23.307	-17.0	0.441	-7.116	23.0	0.143	-16.919
-56.0	0.082	-21.711	-16.0	0.492	-6.159	24.0	0.098	-20.200
-55.0	0.096	-20.335	-15.0	0.543	-5.301	25.0	0.055	-25.193
-54.0	0.111	-19.124	-14.0	0.593	-4.536	26.0	0.015	-36.745
-53.0	0.125	-18.051	-13.0	0.642	-3.850	27.0	0.023	-32.754
-52.0	0.140	-17.106	-12.0	0.689	-3.234	28.0	0.058	-24.704
-51.0	0.154	-16.253	-11.0	0.734	-2.683	29.0	0.090	-20.871
						30.0	0.120	-18.438

file: FML 3-bay elevation tabulation

revision: A

Date: 1/28/08

## Adjacent Channel Study For Station W228AU, Facility\_id: 26347

### Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1009412	71720	BMLH-20041007ACO	WVEI-FM	ENTERCOM LICENSE, LLC	B	WESTERLY	RI	LIC	37	252	279	3	28.6	2.7289
1696257	22874	BLED-20151110ALV	WRNI-FM	RHODE ISLAND PUBLIC RADIO	A	NARRAGANSETT	RI	LIC	1.95	84	274	2	30.7	0
1495839	155793	BLFT-20120412AAC	W277CE	CONNECTICUT CHRISTIAN RADIO	D	MONTVILLE	CT	LIC	0.01	280	277	1	32.7	0
1657970	198394	BNPH-20141124AIV	NEW	RED WOLF BROADCASTING CO	A	SHELTER ISLAND	NY	APP	5.3	109	277	1	61.3	0
227541	52061	BLH-19960604KB	WBAZ	LRS RADIO, LLC	A	BRIDGEHAMPTON	NY	LIC	4.8	111	273	3	69.3	0
1631783	194929	BNPL-20131107AJD	WICT-LP	MANCHESTER COMMUNITY COL	L1	MANCHESTER	CT	CP	0	97	277	1	74.7	0
1742696	194829	BMPL-20161024ABJ	WFPR-LP	FRANKLIN COMMUNITY CABLE A	L1	FRANKLIN	MA	CP MOD	0	147.3	275	1	85.7	0
1653896	7718	BLH-20140929AGJ	WDRC-FM	CONNOISSEUR MEDIA LICENSES	B	HARTFORD	CT	LIC	19.54	345	275	1	86.8	0
1312266	10542	BLH-20090515ABT	WKLH-FM	CHARLES RIVER BROADCASTING	B	WALTHAM	MA	LIC	14	320	273	3	116.2	0
1405739	9639	BLH-20101105AAI	WODS	CBS RADIO EAST INC.	B	BOSTON	MA	LIC	8.7	391.6	277	1	116.4	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
174265	64841	BMLH-19920605KA	WPRO-FM	RADIO LICENSE HOLDING CBC, I	B	PROVIDENCE	RI	LIC	39	230	222	54	57.4	42.4
202542	74205	BLH-19940916KD	WWYZ	CAPSTAR TX, LLC	B	WATERBURY	CT	LIC	17	368	223	53	86.9	71.9

850 000 FEET (CONN.)

50'

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