

## **Non-Interference Compliance**

Regarding Facility id 73057

Channel 218

### **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.

### 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
1209617	BMLED20071004AA C	WLBL-FM	78.2	78.2
1244777	BMLED20080430AC K	WXPW	78.2	78.2
738992	BLLED20031023AAF	WHRM	110.8	108.7
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>78.2</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 **78.2 dBμ**, this makes the proposed translator's worst-case interfering contour **118.2 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **112.5 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 **13 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 predicted interference is 20ft (6.1m) in height. This proposal provides 13m (42.7ft) 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:	PSI
Antenna Model:	FML-2(.75)
CORAGL:	38 m
Maximum ERP:	0.17 kW
Interfering Contour:	118.2 dBμ
Max Int. Contour Distance:	112.5 m
Min Ground Clearance:	13 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	.975	161.6	109.7	109.3	28.4
10	.903	138.6	101.6	100.1	20.4
15	.792	106.6	89.1	86.1	14.9
20	.650	71.8	73.1	68.7	13.0
25	.493	41.3	55.5	50.3	14.6
30	.331	18.6	37.2	32.3	19.4
35	.178	5.4	20.0	16.4	26.5
40	.043	0.3	4.8	3.7	34.9
45	.068	0.8	7.7	5.4	32.6
50	.149	3.8	16.8	10.8	25.2
55	.202	6.9	22.7	13.0	19.4
60	.227	8.8	25.5	12.8	15.9
65	.226	8.7	25.4	10.7	15.0
70	.205	7.1	23.1	7.9	16.3
75	.168	4.8	18.9	4.9	19.7
80	.118	2.4	13.3	2.3	24.9
85	.061	0.6	6.9	0.6	31.2
90	.001	0.0	0.1	0.0	37.9
Minimum Clearance above TGL:					<b>13 m</b>

**Propagation Systems Inc.**

Elevation Pattern Tabulation

Antenna: PSIFML-2 Special

Bay spacing: 3/4 wave

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
-90.00	0.001	-60.000	-50.00	0.149	-16.513	-10.00	0.903	-0.883
-89.00	0.012	-38.221	-49.00	0.135	-17.364	-9.00	0.921	-0.713
-88.00	0.025	-32.201	-48.00	0.120	-18.405	-8.00	0.937	-0.561
-87.00	0.037	-28.679	-47.00	0.104	-19.677	-7.00	0.952	-0.429
-86.00	0.049	-26.207	-46.00	0.086	-21.289	-6.00	0.964	-0.315
-85.00	0.061	-24.285	-45.00	0.068	-23.404	-5.00	0.975	-0.219
-84.00	0.073	-22.748	-44.00	0.048	-26.425	-4.00	0.984	-0.139
-83.00	0.085	-21.443	-43.00	0.027	-31.481	-3.00	0.991	-0.079
-82.00	0.096	-20.349	-42.00	0.005	-46.848	-2.00	0.996	-0.036
-81.00	0.107	-19.378	-41.00	0.018	-34.664	-1.00	0.999	-0.009
-80.00	0.118	-18.538	-40.00	0.043	-27.417	0.00	1.000	0.000
-79.00	0.129	-17.792	-39.00	0.068	-23.365	1.00	0.999	-0.009
-78.00	0.139	-17.125	-38.00	0.094	-20.529	2.00	0.996	-0.036
-77.00	0.149	-16.522	-37.00	0.121	-18.329	3.00	0.991	-0.079
-76.00	0.159	-15.984	-36.00	0.149	-16.531	4.00	0.984	-0.139
-75.00	0.168	-15.508	-35.00	0.178	-14.998	5.00	0.975	-0.219
-74.00	0.176	-15.072	-34.00	0.207	-13.669	6.00	0.964	-0.315
-73.00	0.184	-14.685	-33.00	0.237	-12.489	7.00	0.952	-0.429
-72.00	0.192	-14.335	-32.00	0.268	-11.431	8.00	0.937	-0.561
-71.00	0.199	-14.026	-31.00	0.299	-10.475	9.00	0.921	-0.713
-70.00	0.205	-13.752	-30.00	0.331	-9.602	10.00	0.903	-0.882
-69.00	0.211	-13.518	-29.00	0.363	-8.801	11.00	0.884	-1.072
-68.00	0.216	-13.315	-28.00	0.395	-8.061	12.00	0.863	-1.279
-67.00	0.220	-13.146	-27.00	0.428	-7.377	13.00	0.841	-1.508
-66.00	0.224	-13.009	-26.00	0.460	-6.742	14.00	0.817	-1.757
-65.00	0.226	-12.904	-25.00	0.493	-6.151	15.00	0.792	-2.029
-64.00	0.228	-12.834	-24.00	0.525	-5.599	16.00	0.765	-2.322
-63.00	0.229	-12.800	-23.00	0.557	-5.083	17.00	0.738	-2.639
-62.00	0.229	-12.794	-22.00	0.589	-4.603	18.00	0.710	-2.979
-61.00	0.228	-12.829	-21.00	0.620	-4.154	19.00	0.680	-3.344
-60.00	0.227	-12.898	-20.00	0.650	-3.736	20.00	0.650	-3.736
-59.00	0.224	-13.009	-19.00	0.680	-3.344	21.00	0.620	-4.154
-58.00	0.220	-13.158	-18.00	0.710	-2.979	22.00	0.589	-4.603
-57.00	0.215	-13.351	-17.00	0.738	-2.639	23.00	0.557	-5.083
-56.00	0.209	-13.600	-16.00	0.765	-2.323	24.00	0.525	-5.599
-55.00	0.202	-13.894	-15.00	0.792	-2.029	25.00	0.493	-6.151
-54.00	0.194	-14.260	-14.00	0.817	-1.759	26.00	0.460	-6.742
-53.00	0.184	-14.685	-13.00	0.840	-1.510	27.00	0.428	-7.377
-52.00	0.174	-15.192	-12.00	0.863	-1.281	28.00	0.395	-8.061
-51.00	0.162	-15.795	-11.00	0.884	-1.072	29.00	0.363	-8.801
						30.00	0.331	-9.602

# **Adjacent Channel Study** **For Station W218CC, Facility\_id: 73057**

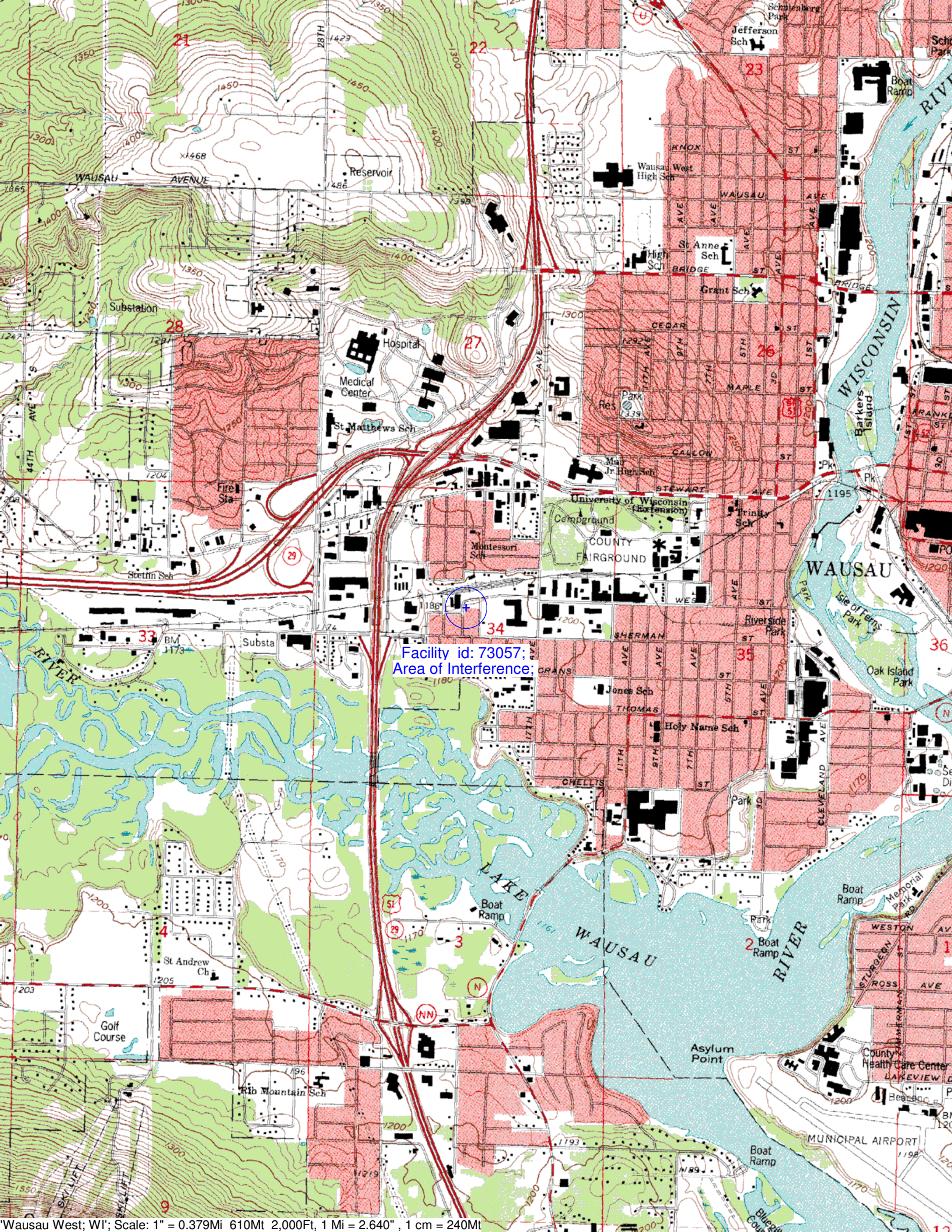
## **Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1244777	72222	BMLED-20080430AC	WXPW	WHITE PINE COMMUNITY BROA	A	WAUSAU	WI	LIC	0.054	645	220	2	4.4	1.0144
738992	63083	BLED-20031023AAF	WHRM	STATE OF WISCONSIN - EDUCA	C0	WAUSAU	WI	LIC	81	715	215	3	4.4	1.0144
1209617	63031	BMLED-20071004AA	WLBL-FM	STATE OF WISCONSIN - EDUCA	A	WAUSAU	WI	LIC	0.054	648	220	2	4.4	1.0144
1481656	155144	BLFT-20111228ABQ	W221CN	MUZZY BROADCAST GROUP, LLC	D	MARSHFIELD	WI	LIC	0.25	440	221	3	46.5	0
1189085	122231	BLFT-20070601AFS	W217BO	WRVM, INC.	D	MARSHFIELD	WI	LIC	0.055	422	217	1	50.6	0
1638924	176219	BLED-20140527ABA	WGBT	RADIO 74 INTERNATIONALE	C3	TOMAHAWK	WI	LIC	22	513	217	1	74.8	0
1720477	175071	BLED-20160212AAN	WRAO	WISCONSIN RAPIDS SEVENTH-D	C2	WISCONSIN RAPI	WI	LIC	30	348	219	1	76.2	0
1201726	72220	BLED-20070913ABN	WXPR	WHITE PINE COMMUNITY BROA	C1	RHINELANDER	WI	LIC	100	623	219	1	96.8	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
--------	--------	-------------	------	----------	-------	------	-------	--------	-----	--------	---------	-----	------	-----





Facility id: 73057;  
Area of Interference:



