

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 147546

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

Page 7 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 dB μ 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 8 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 9 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 μ 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
201088	BLH19940718KB	WGRR	92.8	92.8
277002	BLH19981112KL	WEBN	92.8	99.9
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			92.8	

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 **92.8 dB μ** , this makes the proposed translator's worst-case interfering contour **132.8 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **13.9 m** from the transmit antenna.

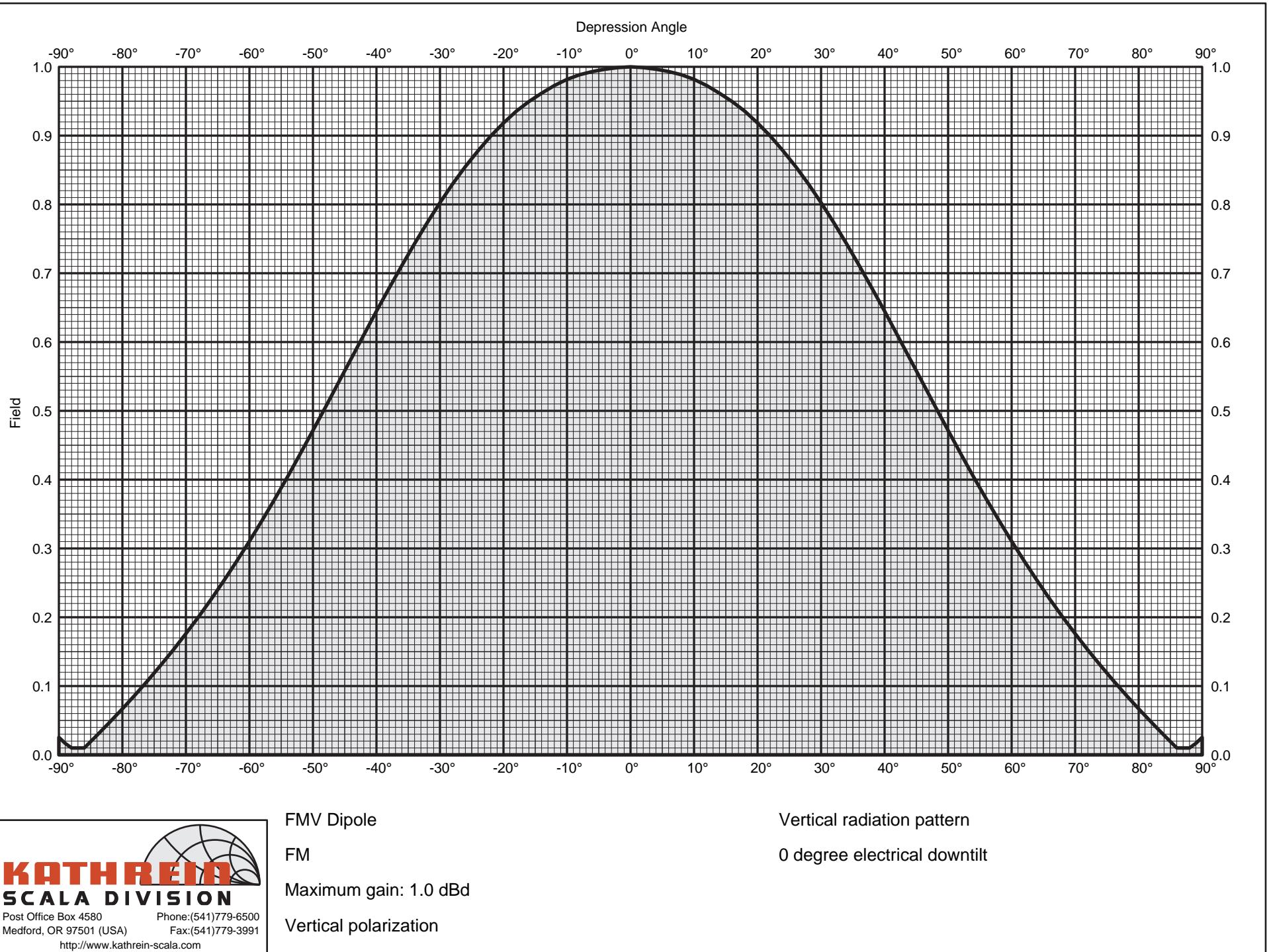
The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative 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 **198.2 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 communications building within the zone of predicted interference is less than 20ft in height. This proposal provides 198.2m (650ft) 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:	SCA
Antenna Model:	FMV
CORAGL:	204 m
Maximum ERP:	0.075 kW
Interfering Contour:	132.8 dB μ
Max Int. Contour Distance:	13.9 m
Min Ground Clearance:	198.2 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	.995	74.3	13.8	13.8	202.8
10	.982	72.3	13.7	13.5	201.6
15	.956	68.5	13.3	12.9	200.6
20	.918	63.2	12.8	12.0	199.6
25	.867	56.4	12.1	10.9	198.9
30	.803	48.4	11.2	9.7	198.4
35	.727	39.6	10.1	8.3	198.2
40	.645	31.2	9.0	6.9	198.2
45	.558	23.4	7.8	5.5	198.5
50	.472	16.7	6.6	4.2	199.0
55	.388	11.3	5.4	3.1	199.6
60	.310	7.2	4.3	2.2	200.3
65	.240	4.3	3.3	1.4	201.0
70	.176	2.3	2.4	0.8	201.7
75	.119	1.1	1.7	0.4	202.4
80	.067	0.3	0.9	0.2	203.1
85	.019	0.0	0.3	0.0	203.7
90	.025	0.0	0.3	0.0	203.7

Minimum Clearance above TGL: **198.2 m**





FMV Dipole

FM

Maximum gain: 1.0 dBd

Vertical polarization

Vertical radiation pattern
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
-90	0.025	-31.89	-30.89	0.00	-45	0.558	-5.07	-4.07	0.39
-89	0.017	-35.56	-34.56	0.00	-44	0.575	-4.80	-3.80	0.42
-88	0.010	-40.00	-39.00	0.00	-43	0.593	-4.54	-3.54	0.44
-87	0.010	-40.00	-39.00	0.00	-42	0.610	-4.29	-3.29	0.47
-86	0.010	-39.94	-38.94	0.00	-41	0.628	-4.05	-3.05	0.50
-85	0.019	-34.30	-33.30	0.00	-40	0.645	-3.81	-2.81	0.52
-84	0.028	-30.91	-29.91	0.00	-39	0.662	-3.59	-2.59	0.55
-83	0.038	-28.42	-27.42	0.00	-38	0.678	-3.37	-2.37	0.58
-82	0.047	-26.48	-25.48	0.00	-37	0.695	-3.16	-2.16	0.61
-81	0.057	-24.86	-23.86	0.00	-36	0.711	-2.96	-1.96	0.64
-80	0.067	-23.49	-22.49	0.01	-35	0.727	-2.77	-1.77	0.67
-79	0.077	-22.27	-21.27	0.01	-34	0.743	-2.58	-1.58	0.70
-78	0.087	-21.20	-20.20	0.01	-33	0.758	-2.40	-1.40	0.72
-77	0.098	-20.21	-19.21	0.01	-32	0.774	-2.23	-1.23	0.75
-76	0.108	-19.33	-18.33	0.01	-31	0.788	-2.07	-1.07	0.78
-75	0.119	-18.49	-17.49	0.02	-30	0.803	-1.91	-0.91	0.81
-74	0.130	-17.73	-16.73	0.02	-29	0.816	-1.76	-0.76	0.84
-73	0.141	-17.01	-16.01	0.03	-28	0.830	-1.62	-0.62	0.87
-72	0.152	-16.34	-15.34	0.03	-27	0.842	-1.49	-0.49	0.89
-71	0.164	-15.69	-14.69	0.03	-26	0.855	-1.36	-0.36	0.92
-70	0.176	-15.08	-14.08	0.04	-25	0.867	-1.24	-0.24	0.95
-69	0.188	-14.50	-13.50	0.04	-24	0.878	-1.13	-0.13	0.97
-68	0.201	-13.95	-12.95	0.05	-23	0.889	-1.02	-0.02	0.99
-67	0.214	-13.41	-12.41	0.06	-22	0.899	-0.92	0.08	1.02
-66	0.226	-12.90	-11.90	0.06	-21	0.909	-0.83	0.17	1.04
-65	0.240	-12.40	-11.40	0.07	-20	0.918	-0.74	0.26	1.06
-64	0.254	-11.92	-10.92	0.08	-19	0.927	-0.66	0.34	1.08
-63	0.268	-11.45	-10.45	0.09	-18	0.935	-0.58	0.42	1.10
-62	0.282	-11.01	-10.01	0.10	-17	0.942	-0.51	0.49	1.12
-61	0.296	-10.57	-9.57	0.11	-16	0.950	-0.45	0.55	1.14
-60	0.310	-10.16	-9.16	0.12	-15	0.956	-0.39	0.61	1.15
-59	0.326	-9.75	-8.75	0.13	-14	0.962	-0.34	0.66	1.16
-58	0.341	-9.35	-8.35	0.15	-13	0.967	-0.29	0.71	1.18
-57	0.356	-8.96	-7.96	0.16	-12	0.973	-0.24	0.76	1.19
-56	0.372	-8.59	-7.59	0.17	-11	0.977	-0.20	0.80	1.20
-55	0.388	-8.22	-7.22	0.19	-10	0.982	-0.16	0.84	1.21
-54	0.404	-7.87	-6.87	0.21	-9	0.985	-0.13	0.87	1.22
-53	0.421	-7.52	-6.52	0.22	-8	0.989	-0.10	0.90	1.23
-52	0.438	-7.18	-6.18	0.24	-7	0.991	-0.08	0.92	1.24
-51	0.455	-6.85	-5.85	0.26	-6	0.993	-0.06	0.94	1.24
-50	0.472	-6.53	-5.53	0.28	-5	0.995	-0.04	0.96	1.25
-49	0.489	-6.22	-5.22	0.30	-4	0.997	-0.03	0.97	1.25
-48	0.506	-5.92	-4.92	0.32	-3	0.998	-0.02	0.98	1.25
-47	0.523	-5.63	-4.63	0.34	-2	0.999	-0.01	0.99	1.26
-46	0.541	-5.34	-4.34	0.37	-1	0.999	-0.00	1.00	1.26
					0	1.000	0.00	1.00	1.26



FMV Dipole

FM

Maximum gain: 1.0 dBd

Vertical polarization

Vertical radiation pattern
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
0	1.000	0.00	1.00	1.26	45	0.558	-5.07	-4.07	0.39
1	0.999	-0.00	1.00	1.26	46	0.541	-5.34	-4.34	0.37
2	0.999	-0.01	0.99	1.26	47	0.523	-5.63	-4.63	0.34
3	0.998	-0.02	0.98	1.25	48	0.506	-5.92	-4.92	0.32
4	0.997	-0.03	0.97	1.25	49	0.489	-6.22	-5.22	0.30
5	0.995	-0.04	0.96	1.25	50	0.472	-6.53	-5.53	0.28
6	0.993	-0.06	0.94	1.24	51	0.455	-6.85	-5.85	0.26
7	0.991	-0.08	0.92	1.24	52	0.438	-7.18	-6.18	0.24
8	0.989	-0.10	0.90	1.23	53	0.421	-7.52	-6.52	0.22
9	0.985	-0.13	0.87	1.22	54	0.404	-7.87	-6.87	0.21
10	0.982	-0.16	0.84	1.21	55	0.388	-8.22	-7.22	0.19
11	0.977	-0.20	0.80	1.20	56	0.372	-8.59	-7.59	0.17
12	0.973	-0.24	0.76	1.19	57	0.356	-8.96	-7.96	0.16
13	0.967	-0.29	0.71	1.18	58	0.341	-9.35	-8.35	0.15
14	0.962	-0.34	0.66	1.16	59	0.326	-9.75	-8.75	0.13
15	0.956	-0.39	0.61	1.15	60	0.310	-10.16	-9.16	0.12
16	0.950	-0.45	0.55	1.14	61	0.296	-10.57	-9.57	0.11
17	0.942	-0.51	0.49	1.12	62	0.282	-11.01	-10.01	0.10
18	0.935	-0.58	0.42	1.10	63	0.268	-11.45	-10.45	0.09
19	0.927	-0.66	0.34	1.08	64	0.254	-11.92	-10.92	0.08
20	0.918	-0.74	0.26	1.06	65	0.240	-12.40	-11.40	0.07
21	0.909	-0.83	0.17	1.04	66	0.226	-12.90	-11.90	0.06
22	0.899	-0.92	0.08	1.02	67	0.214	-13.41	-12.41	0.06
23	0.889	-1.02	-0.02	0.99	68	0.201	-13.95	-12.95	0.05
24	0.878	-1.13	-0.13	0.97	69	0.188	-14.50	-13.50	0.04
25	0.867	-1.24	-0.24	0.95	70	0.176	-15.08	-14.08	0.04
26	0.855	-1.36	-0.36	0.92	71	0.164	-15.69	-14.69	0.03
27	0.842	-1.49	-0.49	0.89	72	0.152	-16.34	-15.34	0.03
28	0.830	-1.62	-0.62	0.87	73	0.141	-17.01	-16.01	0.03
29	0.816	-1.76	-0.76	0.84	74	0.130	-17.73	-16.73	0.02
30	0.803	-1.91	-0.91	0.81	75	0.119	-18.49	-17.49	0.02
31	0.788	-2.07	-1.07	0.78	76	0.108	-19.33	-18.33	0.01
32	0.774	-2.23	-1.23	0.75	77	0.098	-20.21	-19.21	0.01
33	0.758	-2.40	-1.40	0.72	78	0.087	-21.20	-20.20	0.01
34	0.743	-2.58	-1.58	0.70	79	0.077	-22.27	-21.27	0.01
35	0.727	-2.77	-1.77	0.67	80	0.067	-23.49	-22.49	0.01
36	0.711	-2.96	-1.96	0.64	81	0.057	-24.86	-23.86	0.00
37	0.695	-3.16	-2.16	0.61	82	0.047	-26.48	-25.48	0.00
38	0.678	-3.37	-2.37	0.58	83	0.038	-28.42	-27.42	0.00
39	0.662	-3.59	-2.59	0.55	84	0.028	-30.91	-29.91	0.00
40	0.645	-3.81	-2.81	0.52	85	0.019	-34.30	-33.30	0.00
41	0.628	-4.05	-3.05	0.50	86	0.010	-39.94	-38.94	0.00
42	0.610	-4.29	-3.29	0.47	87	0.010	-40.00	-39.00	0.00
43	0.593	-4.54	-3.54	0.44	88	0.010	-40.00	-39.00	0.00
44	0.575	-4.80	-3.80	0.42	89	0.017	-35.56	-34.56	0.00
					90	0.025	-31.89	-30.89	0.00

Adjacent Channel Study
For Station W237DW, Facility_id: 147546

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
277002	29734	BLH-19981112KL	WEBN	CITICASTERS LICENSES, INC.	B	CINCINNATI	OH	LIC	16	483	274	2	0	1.1298
201088	72126	BLH-19940718KB	WGRR	RADIO LICENSE HOLDING SRC L	B	HAMILTON	OH	LIC	11	536	278	2	9.5	1.1298
1290261	50136	BLH-20090401AMS	WRAC	DREAMCATCHER COMMUNICATI	A	GEORGETOWN	OH	LIC	6	374.1	276	0	69.3	0
1224885	142404	BLFT-20071105ADP	W278BB	INDIANA COMMUNITY RADIO COI	D	GREENSBURG	IN	LIC	0.027	351	278	2	88.2	0
1185725	157110	BLFT-20070509AAL	W273BQ	SPIRIT COMMUNICATIONS, INC.	D	DAYTON	OH	LIC	0.027	347	273	3	92.8	0
1313058	142215	BLFT-20090518ABP	W279AM	T.C.W. BROADCASTING, INC.	D	RUSHVILLE	IN	LIC	0.23	302	279	3	97.8	0
1684967	138923	BLFT-20150807AAG	W277AO	BRADLEE J BEER	D	ENON	OH	LIC	0.158	361	277	1	99.9	0
159430	1037	BLH-19910422KA	WSTV-FM	SOUTHERN BELLE, LLC	A	FRANKFORT	KY	LIC	2.5	336	279	3	105.8	0
1727880	153212	BPFT-20160510ABH	W275BT	WESTERN KENTUCKY UNIVERSI	D	FRANKFORT	KY	CP	0.027	289	275	1	105.9	0
1727407	153212	BLFT-20160428ABQ	W275BT	WESTERN KENTUCKY UNIVERSI	D	LAWRENCEBURG	KY	LIC	0.25	289	275	1	105.9	0
1321053	60252	BLH-20090901AFM	WDHT	ALPHA MEDIA LICENSEE LLC	B	URBANA	OH	LIC	50	460	275	1	107.7	0
1191283	142405	BLFT-20070615ADK	W279BR	EDUCATIONAL MEDIA FOUNDAT	D	GREENVILLE	OH	LIC	0.08	365	279	3	109.1	0
274567	34245	BLH-19980929KB	WXZZ	CUMULUS LICENSING LLC	A	GEORGETOWN	KY	LIC	6	387	277	1	116.8	0
1364701	16255	BLH-20100511ACB	WXCH	REISING RADIO PARTNERS INC.	A	COLUMBUS	IN	LIC	5.1	301	275	1	125.8	0
1256010	20332	BLH-20080714ADM	WQNU	SM-WQNU, LLC	C2	LYNDON	KY	LIC	23	359	276	0	126.6	0
633443	11673	BLH-20030310AXD	WLTO	CUMULUS LICENSING LLC	A	NICHOLASVILLE	KY	LIC	4.6	397.8	273	3	128.6	0
13459	74092	BLH-19790912AC	WMDH-FM	RADIO LICENSE HOLDING CBC, I	B	NEW CASTLE	IN	LIC	50	468	273	3	128.9	0
1163477	59589	BMLH-20061208ACR	WOLT	CAPSTAR TX, LLC	B	INDIANAPOLIS	IN	LIC	18	515	277	1	169.6	0

COVINGTON QUADRANGLE
KENTUCKY-OHIO
7.5 MINUTE SERIES (TOPOGRAPHIC)

71

1 920 000 FEET (K.Y.)

715

4°30'

39°07'30"

4162 III NW
(CINCINNATI EAST)

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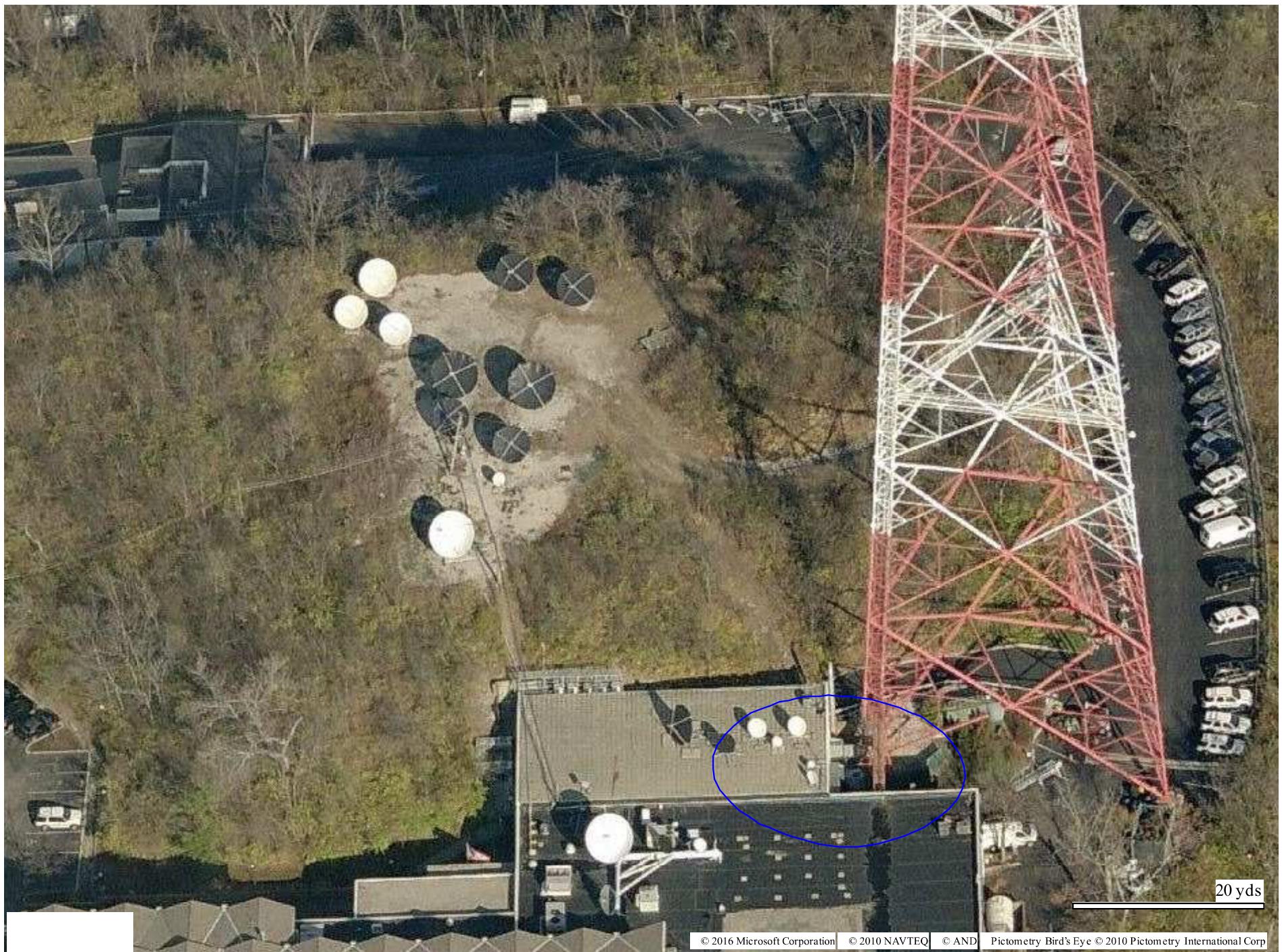
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