

Non-Interference Compliance

Regarding Facility id 145404

Channel 280

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 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 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.

Note: The tallest buildings within the zone of interference are 10ft (3.0m) in height. This application provides 4.1m (13.5ft) 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.

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
118821	BLH19880930KC	WSNX-FM	72.3	72.3
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				72.3

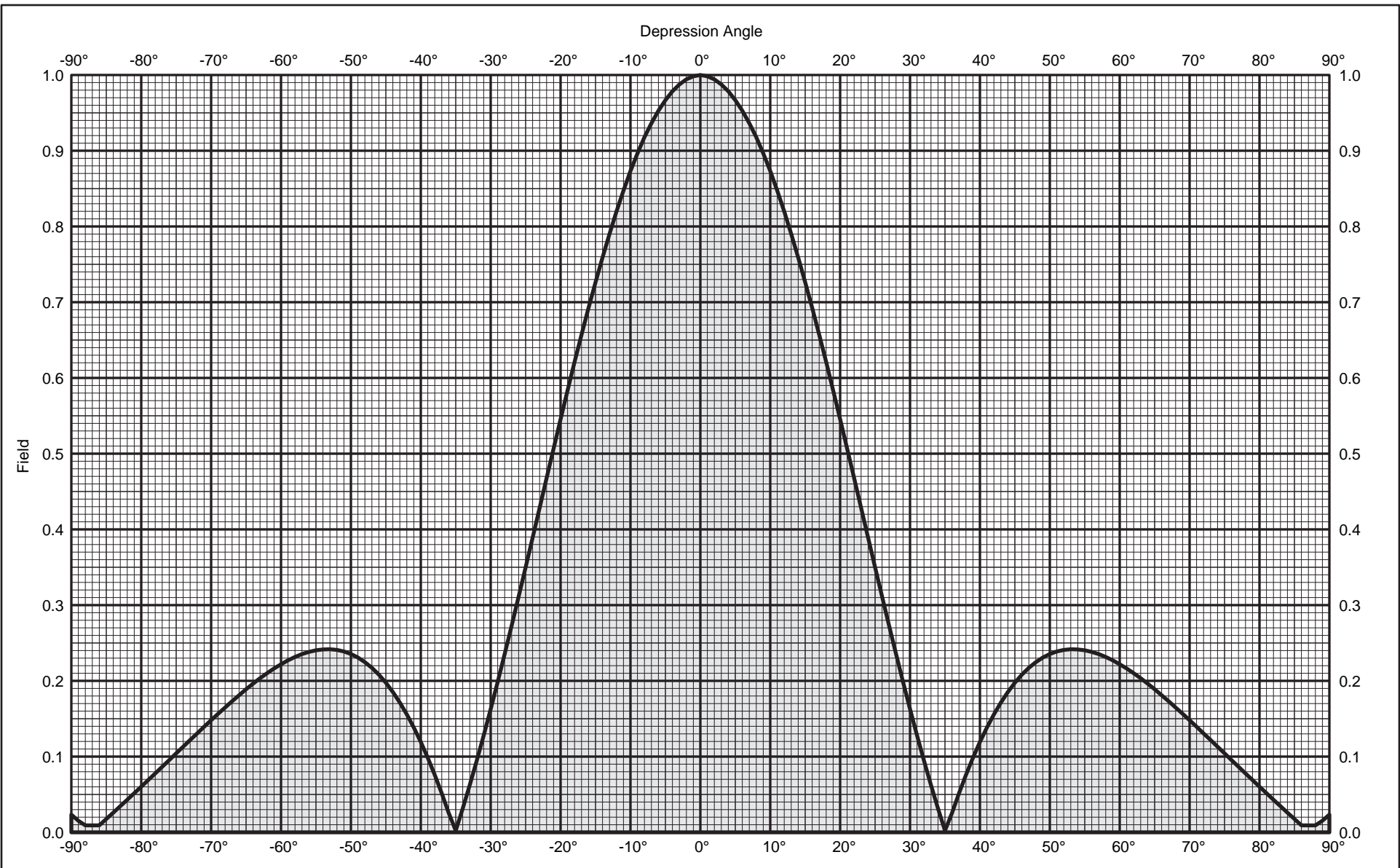
FCC 02-244 at Section II.A.5 states that "when demonstrating that 'no actual interference will occur due to . . . other factors,' pursuant to Section 74.1204(d), an applicant may use the undesired-to-desired signal ratio method." The undesired-to-desired ratio for second and third adjacent stations required by § 74.1204(a) is 40 dB. Since the minimum protected contour strength within the proposed translator's standard interference contour is **72.3 dBμ**, this makes the proposed translator's worst-case interfering contour **112.3 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **131.8 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 **4.1 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 tallest buildings within the zone of interference are 10ft (3.0m) in height. This application provides 4.1m (13.5ft) 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-2
CORAGL:	30 m
Maximum ERP:	0.06 kW
Interfering Contour:	112.3 dBμ
Max Int. Contour Distance:	131.8 m
Min Ground Clearance:	4.1 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	.967	56.1	127.5	127.0	18.9
10	.873	45.7	115.1	113.4	10.0
15	.726	31.6	95.7	92.5	5.2
20	.545	17.8	71.9	67.5	5.4
25	.350	7.4	46.1	41.8	10.5
30	.163	1.6	21.5	18.6	19.3
35	.010	0.0	1.3	1.1	29.2
40	.119	0.8	15.7	12.0	19.9
45	.198	2.4	26.1	18.5	11.5
50	.235	3.3	31.0	19.9	6.3
55	.240	3.5	31.6	18.2	4.1
60	.222	3.0	29.3	14.6	4.7
65	.189	2.1	24.9	10.5	7.4
70	.148	1.3	19.5	6.7	11.7
75	.104	0.6	13.7	3.5	16.8
80	.060	0.2	7.9	1.4	22.2
85	.018	0.0	2.4	0.2	27.6
90	.023	0.0	3.0	0.0	27.0
Minimum Clearance above TGL:					4.1 m





KATHREIN
SCALA DIVISION

Post Office Box 4580 Phone:(541)779-6500
Medford, OR 97501 (USA) Fax:(541)779-3991
<http://www.kathrein-scala.com>

FMV-2 Dipole array
FM
Maximum gain: 3.5 dBd
Vertical polarization

Vertical radiation pattern
0 degree electrical downtilt



FMV-2 Dipole array

FM

Maximum gain: 3.5 dBd

Vertical polarization

Vertical radiation pattern

0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
-90	0.023	-32.64	-29.14	0.00	-45	0.198	-14.09	-10.59	0.09
-89	0.015	-36.31	-32.81	0.00	-44	0.185	-14.64	-11.14	0.08
-88	0.010	-40.00	-36.50	0.00	-43	0.171	-15.32	-11.82	0.07
-87	0.010	-40.00	-36.50	0.00	-42	0.156	-16.15	-12.65	0.05
-86	0.010	-40.00	-36.50	0.00	-41	0.138	-17.18	-13.68	0.04
-85	0.018	-35.09	-31.59	0.00	-40	0.119	-18.47	-14.97	0.03
-84	0.026	-31.71	-28.21	0.00	-39	0.098	-20.14	-16.64	0.02
-83	0.035	-29.24	-25.74	0.00	-38	0.076	-22.41	-18.91	0.01
-82	0.043	-27.33	-23.83	0.00	-37	0.051	-25.78	-22.28	0.01
-81	0.052	-25.74	-22.24	0.01	-36	0.025	-31.91	-28.41	0.00
-80	0.060	-24.40	-20.90	0.01	-35	0.010	-40.00	-36.50	0.00
-79	0.069	-23.22	-19.72	0.01	-34	0.032	-30.02	-26.52	0.00
-78	0.078	-22.19	-18.69	0.01	-33	0.062	-24.11	-20.61	0.01
-77	0.087	-21.25	-17.75	0.02	-32	0.094	-20.49	-16.99	0.02
-76	0.095	-20.42	-16.92	0.02	-31	0.128	-17.86	-14.36	0.04
-75	0.104	-19.64	-16.14	0.02	-30	0.163	-15.77	-12.27	0.06
-74	0.113	-18.93	-15.43	0.03	-29	0.199	-14.04	-10.54	0.09
-73	0.122	-18.28	-14.78	0.03	-28	0.235	-12.56	-9.06	0.12
-72	0.131	-17.68	-14.18	0.04	-27	0.273	-11.28	-7.78	0.17
-71	0.139	-17.11	-13.61	0.04	-26	0.311	-10.14	-6.64	0.22
-70	0.148	-16.59	-13.09	0.05	-25	0.350	-9.12	-5.62	0.27
-69	0.157	-16.11	-12.61	0.05	-24	0.389	-8.20	-4.70	0.34
-68	0.165	-15.66	-12.16	0.06	-23	0.428	-7.36	-3.86	0.41
-67	0.173	-15.23	-11.73	0.07	-22	0.468	-6.60	-3.10	0.49
-66	0.181	-14.85	-11.35	0.07	-21	0.507	-5.91	-2.41	0.57
-65	0.189	-14.47	-10.97	0.08	-20	0.545	-5.26	-1.76	0.67
-64	0.196	-14.14	-10.64	0.09	-19	0.584	-4.68	-1.18	0.76
-63	0.204	-13.83	-10.33	0.09	-18	0.621	-4.14	-0.64	0.86
-62	0.210	-13.55	-10.05	0.10	-17	0.657	-3.65	-0.15	0.97
-61	0.216	-13.30	-9.80	0.10	-16	0.693	-3.19	0.31	1.07
-60	0.222	-13.08	-9.58	0.11	-15	0.726	-2.78	0.72	1.18
-59	0.227	-12.87	-9.37	0.12	-14	0.759	-2.40	1.10	1.29
-58	0.232	-12.71	-9.21	0.12	-13	0.790	-2.05	1.45	1.40
-57	0.235	-12.57	-9.07	0.12	-12	0.820	-1.73	1.77	1.50
-56	0.238	-12.46	-8.96	0.13	-11	0.847	-1.44	2.06	1.61
-55	0.240	-12.38	-8.88	0.13	-10	0.873	-1.18	2.32	1.71
-54	0.241	-12.34	-8.84	0.13	-9	0.896	-0.95	2.55	1.80
-53	0.242	-12.33	-8.83	0.13	-8	0.918	-0.74	2.76	1.89
-52	0.241	-12.37	-8.87	0.13	-7	0.936	-0.57	2.93	1.96
-51	0.239	-12.44	-8.94	0.13	-6	0.953	-0.42	3.08	2.03
-50	0.235	-12.56	-9.06	0.12	-5	0.967	-0.29	3.21	2.09
-49	0.231	-12.74	-9.24	0.12	-4	0.978	-0.19	3.31	2.14
-48	0.225	-12.97	-9.47	0.11	-3	0.988	-0.11	3.39	2.18
-47	0.217	-13.26	-9.76	0.11	-2	0.994	-0.05	3.45	2.21
-46	0.208	-13.63	-10.13	0.10	-1	0.998	-0.01	3.49	2.23
					0	1.000	0.00	3.50	2.24



FMV-2 Dipole array

FM

Maximum gain: 3.5 dBd

Vertical polarization

Vertical radiation pattern

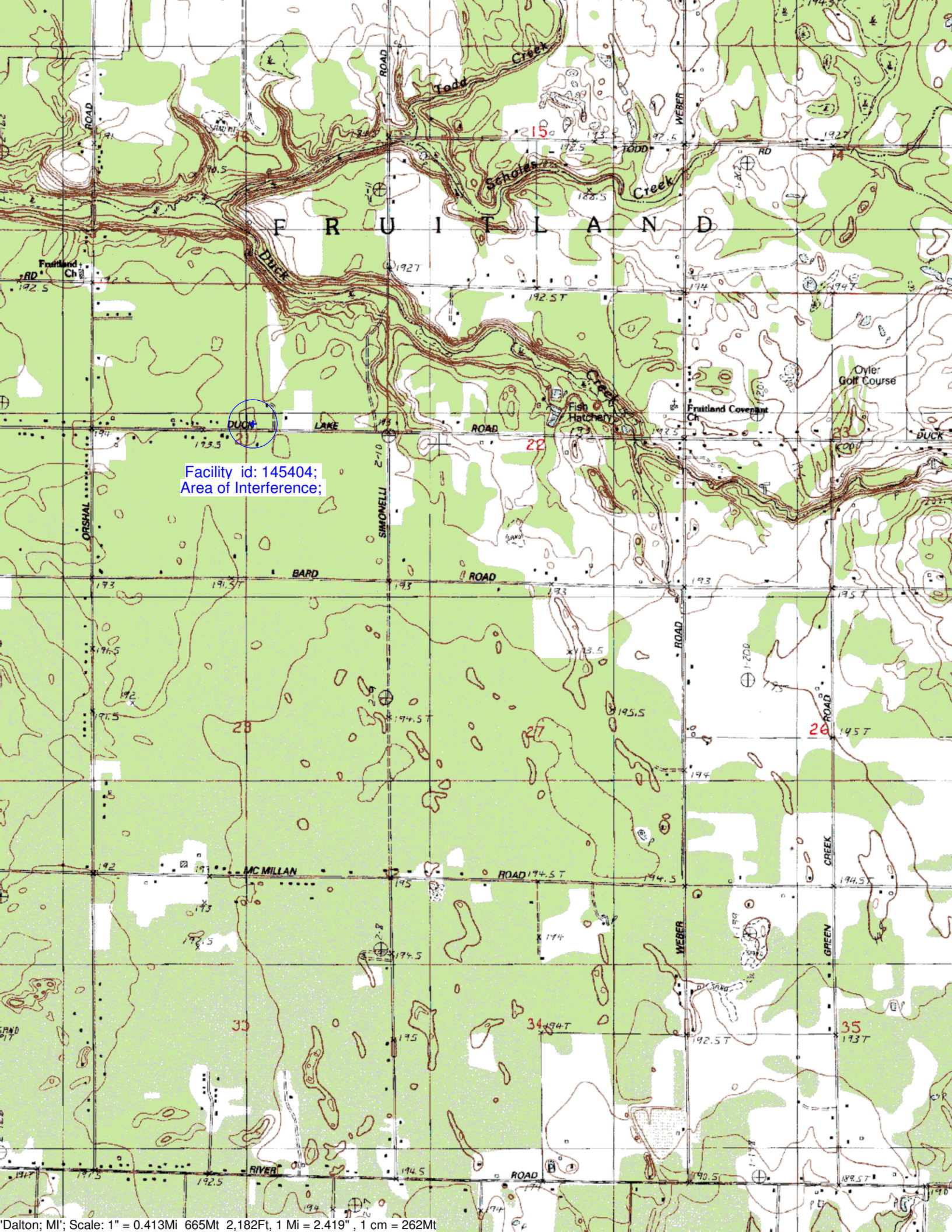
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
0	1.000	0.00	3.50	2.24	45	0.198	-14.09	-10.59	0.09
1	0.998	-0.01	3.49	2.23	46	0.208	-13.63	-10.13	0.10
2	0.994	-0.05	3.45	2.21	47	0.217	-13.26	-9.76	0.11
3	0.988	-0.11	3.39	2.18	48	0.225	-12.97	-9.47	0.11
4	0.978	-0.19	3.31	2.14	49	0.231	-12.74	-9.24	0.12
5	0.967	-0.29	3.21	2.09	50	0.235	-12.56	-9.06	0.12
6	0.953	-0.42	3.08	2.03	51	0.239	-12.44	-8.94	0.13
7	0.936	-0.57	2.93	1.96	52	0.241	-12.37	-8.87	0.13
8	0.918	-0.74	2.76	1.89	53	0.242	-12.33	-8.83	0.13
9	0.896	-0.95	2.55	1.80	54	0.241	-12.34	-8.84	0.13
10	0.873	-1.18	2.32	1.71	55	0.240	-12.38	-8.88	0.13
11	0.847	-1.44	2.06	1.61	56	0.238	-12.46	-8.96	0.13
12	0.820	-1.73	1.77	1.50	57	0.235	-12.57	-9.07	0.12
13	0.790	-2.05	1.45	1.40	58	0.232	-12.71	-9.21	0.12
14	0.759	-2.40	1.10	1.29	59	0.227	-12.87	-9.37	0.12
15	0.726	-2.78	0.72	1.18	60	0.222	-13.08	-9.58	0.11
16	0.693	-3.19	0.31	1.07	61	0.216	-13.30	-9.80	0.10
17	0.657	-3.65	-0.15	0.97	62	0.210	-13.55	-10.05	0.10
18	0.621	-4.14	-0.64	0.86	63	0.204	-13.83	-10.33	0.09
19	0.584	-4.68	-1.18	0.76	64	0.196	-14.14	-10.64	0.09
20	0.545	-5.26	-1.76	0.67	65	0.189	-14.47	-10.97	0.08
21	0.507	-5.91	-2.41	0.57	66	0.181	-14.85	-11.35	0.07
22	0.468	-6.60	-3.10	0.49	67	0.173	-15.23	-11.73	0.07
23	0.428	-7.36	-3.86	0.41	68	0.165	-15.66	-12.16	0.06
24	0.389	-8.20	-4.70	0.34	69	0.157	-16.11	-12.61	0.05
25	0.350	-9.12	-5.62	0.27	70	0.148	-16.59	-13.09	0.05
26	0.311	-10.14	-6.64	0.22	71	0.139	-17.11	-13.61	0.04
27	0.273	-11.28	-7.78	0.17	72	0.131	-17.69	-14.19	0.04
28	0.235	-12.56	-9.06	0.12	73	0.122	-18.28	-14.78	0.03
29	0.199	-14.04	-10.54	0.09	74	0.113	-18.93	-15.43	0.03
30	0.163	-15.77	-12.27	0.06	75	0.104	-19.64	-16.14	0.02
31	0.128	-17.86	-14.36	0.04	76	0.095	-20.42	-16.92	0.02
32	0.095	-20.49	-16.99	0.02	77	0.087	-21.25	-17.75	0.02
33	0.062	-24.11	-20.61	0.01	78	0.078	-22.19	-18.69	0.01
34	0.032	-30.02	-26.52	0.00	79	0.069	-23.22	-19.72	0.01
35	0.010	-40.00	-36.50	0.00	80	0.060	-24.40	-20.90	0.01
36	0.025	-31.91	-28.41	0.00	81	0.052	-25.74	-22.24	0.01
37	0.051	-25.78	-22.28	0.01	82	0.043	-27.33	-23.83	0.00
38	0.076	-22.41	-18.91	0.01	83	0.035	-29.24	-25.74	0.00
39	0.098	-20.14	-16.64	0.02	84	0.026	-31.71	-28.21	0.00
40	0.119	-18.47	-14.97	0.03	85	0.018	-35.09	-31.59	0.00
41	0.138	-17.18	-13.68	0.04	86	0.010	-40.00	-36.50	0.00
42	0.156	-16.15	-12.65	0.05	87	0.010	-40.00	-36.50	0.00
43	0.171	-15.32	-11.82	0.07	88	0.010	-40.00	-36.50	0.00
44	0.185	-14.64	-11.14	0.08	89	0.015	-36.31	-32.81	0.00
					90	0.023	-32.64	-29.14	0.00

Adjacent Channel Study **For Station W227AS, Facility_id: 145404**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
118821	24644	BLH-19880930KC	WSNX-FM	CC LICENSES, LLC	B	MUSKEGON	MI	LIC	32	392	283	3	29.5	1.4254
1436682	125796	BLL-20110722ADN	WUVS-LP	WEST MICHIGAN COMMUNITY HI	L1	MUSKEGON	MI	LIC	0	219	279	1	15.3	0
1583355	194222	BNPL-20131028ADD	WUBY-LP	TRI-COUNTIES BROADCASTING	L1	HESPERIA	MI	CP	0	255	280	0	36.3	0
1673053	191673	BLL-20150306AZP	WSNH-LP	IGLESIA SANANDO LAS NACIONES	L1	GRAND RAPIDS	MI	LIC	0	255	279	1	67.7	0
1629478	196488	BNPL-20131115AVH	NEW	LUDINGTON AREA CATHOLIC SC	L1	LUDINGTON	MI	CP	0	209	280	0	71	0
1642729	191528	BMPH-20140715AAT	NEW	MAX HENRY & ASSOCIATES	A	BIG RAPIDS	MI	CP MOD	6	407.6	280	0	86.7	0
1235719	66309	BMLED-20080306AB	WVGR	REGENTS OF THE UNIVERSITY C	B	GRAND RAPIDS	MI	LIC	96	469	281	1	100.7	0
567268	27031	BMLH-20010731ABY	WXSS	ENTERCOM LICENSE, LLC	B	WAUWATOSA	WI	LIC	19.5	466	279	1	129.1	0
97443	70525	BLH-19870203KB	WTCM-FM	WTCM RADIO, INC.	C0	TRAVERSE CITY	MI	LIC	100	614	278	2	135.3	0
271662	14658	BLH-19980730KC	WKFR-FM	TOWNSQUARE MEDIA KALAMAZ	B	BATTLE CREEK	MI	LIC	50	418	277	3	136.2	0



Facility id: 145404;
Area of Interference;

