

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 151393

Channel 281

### **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 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 $\mu$  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 4 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 5 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1432304	BLFT20110622AAG	W279AG	103.3	100
1538041	BMLH20130124ABI	WOKV-FM	154.1	126.4

Minimum F(50,50) Contour of Adjacent Station within  
Proposed Translator's Standard Interfering Contour **100**

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 **100 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **140 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **7 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population").

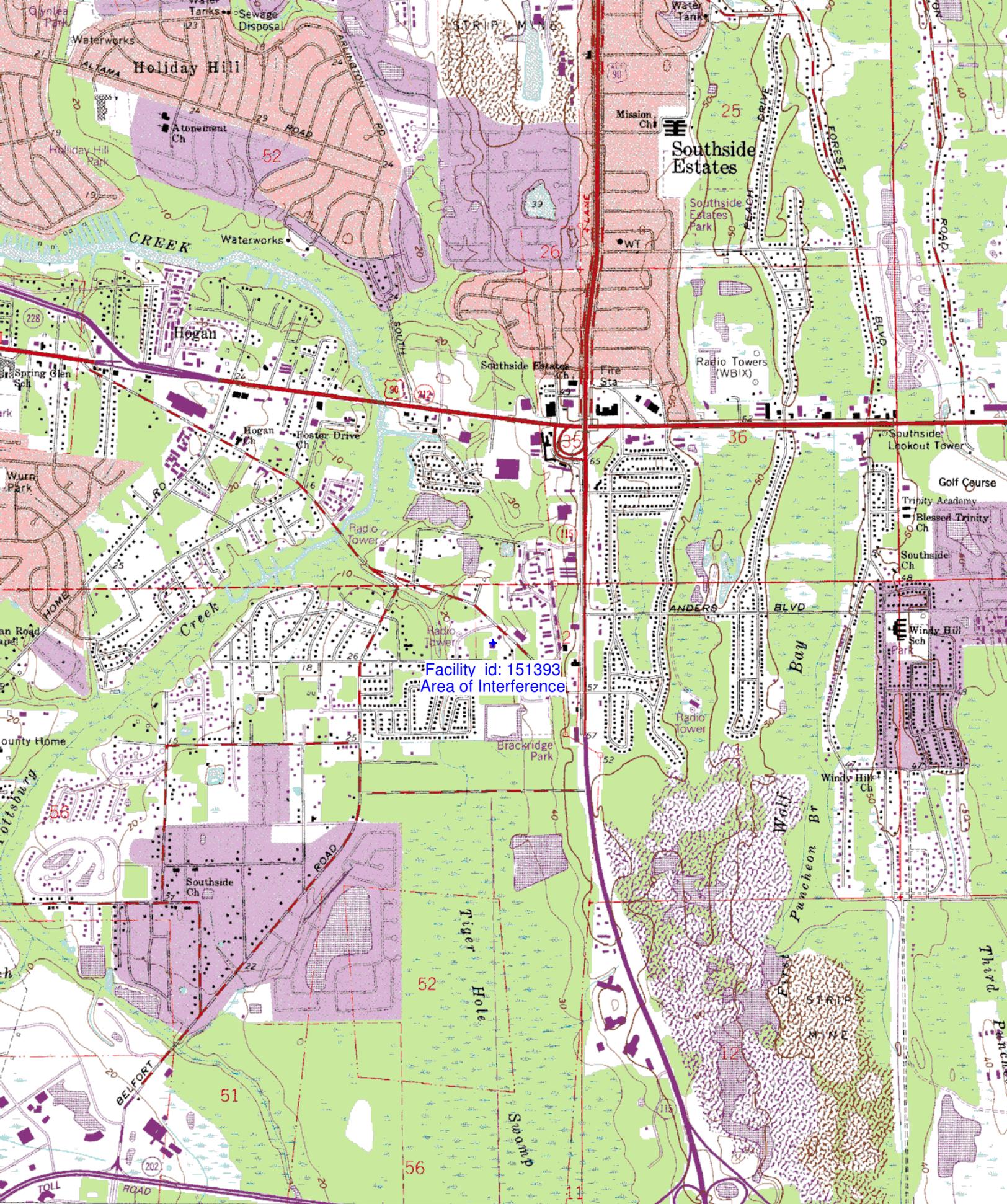
**Note: The only structure within the zone of predicted interference is an unoccupied communications building so in accordance with 47 C.F.R. § 74.1204(d) and the clarification provided by the FCC in the decision *Re: Living Way Ministries* (FCC 02-244), a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.**

**Antenna Manufacturer:** NIC  
**Antenna Model:** BKG77-2(.5)  
**CORAGL:** 245 m  
**Maximum ERP:** 0.099 kW  
**Interfering Contour:** 140 dB $\mu$   
**Max Int. Contour Distance:** 7 m

**Adjacent Channel Study  
For Station W281AM, Facility\_id: 151393**

**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1538041	72081	BMLH-20130124ABI	WOKV-FM	COX RADIO, INC.	C	ATLANTIC BEACH	FL	LIC	98.8	315	283	2	0	0.5908
1432304	76224	BLFT-20110622AAG	W279AG	NEW COVENANT MINISTRIES, IN	D	ATLANTIC BEACH	FL	LIC	0.25	284	279	2	0.8	0.5908
1724886	151917	BLFT-20160413AEE	W280EY	WSOS RADIO LLC	D	ST. AUGUSTINE	FL	LIC	0.24	125	280	1	43.2	0
1754046	157073	BLFT-20170329ABQ	W278BP	CENTRAL FLORIDA EDUCATION/	D	PALM COAST	FL	LIC	0.054	72	278	3	87.9	0
1534020	151451	BLFT-20121212ACI	W279BC	SOUTHERN MEDIA INTERACTIVE	D	BRUNSWICK	GA	LIC	0.25	68	279	2	97	0
1722301	192225	BLL-20160219ABX	WGVC-LP	GAINESVILLE SEVENTH-DAY AD'	L1	GAINESVILLE	FL	LIC	0	67	281	0	100.2	0
81156	66575	BLH-19850820KL	WRUF-FM	THE UNIVERSITY OF FLORIDA	C1	GAINESVILLE	FL	LIC	100	275	279	2	101.8	0
1695673	472	BLH-20160107AAN	WRJY	GOLDEN ISLES BROADCASTING,	A	BRUNSWICK	GA	LIC	3.9	126.7	281	0	102.3	0
692781	53457	BMLH-20031010ADD	WTKS-FM	CLEAR CHAN. B/CASTING LICEN:	C	COCOA BEACH	FL	LIC	94	500	281	0	194.4	0



Facility id: 151393  
 Area of Interference

(BAYARD)  
 4644 II NE

SCALE 1:24 000

