

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 141780

Channel 242

### **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.

**Note: There are no major roads within the zone of predicted interference. The only structures within the zone of interference are unoccupied communications buildings 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.**

**Note: Exhibit 13A, attached to this application, demonstrates that Radio Training Network's NEW, Brunswick, GA FAC# 152922, BNPFT-20030317AYL at its present location qualifies for a 1204d population waiver; hence, both Brunswick applications can be granted construction permits.**

## 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.

<u>Application_id</u>	<u>File Number</u>	<u>Callsign</u>	<u>Contour at Tower</u>	<u>Min. Contour</u>
646132	BNPFT20030317AYL	NEW	82.8	82.8
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>82.8</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 **82.8 dBμ**, this makes the proposed translator's worst-case interfering contour **122.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **80.3 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: There are no major roads within the zone of predicted interference. The only structures within the zone of interference are unoccupied communications buildings 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:** TEL  
**Antenna Model:** ANT90D  
**CORAGL:** 116 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 122.8 dBμ  
**Max Int. Contour Distance:** 80.3 m

## Adjacent Channel Study For Station NEW, Facility\_id: 141780

### Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
646132	152922	BNPFT-20030317AYL	NEW	RADIO TRAINING NETWORK, INC.	D	BRUNSWICK	GA	APP	0.08	56	240	2	2	1.4918
1564052	153363	BNPFT-20030317BCA	NEW	RADIO TRAINING NETWORK, INC.	D	NEW HOPE	GA	APP	0.08	53	244	2	13.6	0
1416645	151739	BPFT-20101112ADF	W239AL	REACH COMMUNICATIONS, INC.	D	FERNANDINA BEAC	FL	CP	0.21	77	239	3	59.9	0
1183145	151739	BLFT-20070425AIG	W239AL	REACH COMMUNICATIONS, INC.	D	FERNANDINA BEAC	FL	LIC	0.022	77	239	3	59.9	0
1436586	140868	BLFT-20110721ALI	W242BE	SATILLA BROADCAST PROPERTIES, LLC	D	WAYCROSS	GA	LIC	0.25	159	242	0	80.4	0
120105	55706	BLH-19881109KA	WEJZ	RENDA BROADCASTING CORP. OF NEVADA	C0	JACKSONVILLE	FL	LIC	100	304	241	1	97.5	0
1418687	37178	BMLH-20110307ACU	WJCL-FM	CUMULUS LICENSING LLC	C	SAVANNAH	GA	LIC	100	361	243	1	97.6	0
1538044	53590	BMLH-20130124AAR	WJGL	COX RADIO, INC.	C0	JACKSONVILLE	FL	LIC	98.8	315	245	3	101.8	0
1439993	151838	BLFT-20110812ACY	W244CR	SOUTH GEORGIA BROADCASTERS, INC.	D	BAXLEY	GA	LIC	0.25	345	244	2	113.3	0
1174716	146781	BLFT-20070228AAS	W243AQ	REACH COMMUNICATIONS, INC.	D	MACCLENNY	FL	LIC	0.027	122	243	1	119.4	0
1199911	41336	BLH-20070817AAJ	WQPW	SOUTHERN COMMUNICATIONS, LLC	C2	VALDOSTA	GA	LIC	32	231.7	239	3	165	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
1492073	170483	BLH-20120430ADW	WSGT	MATTOX BROADCASTING, INC.	A	PATTERSON	GA	LIC	6	123.9	296	54	65	55



Facility id: 141780;  
Area of Interference;

