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EXHIBIT 13 BLACK MEDIA WORKS, INC. COMPREHENSIVE TECHNICAL STATEMENT

TRANSLATOR W259CC – IMMOKALEE, FL FACID 156224

FCC FORM 349

This Technical Statement is in support of FCC form 349 filed by Black Media Works, Inc. ("BMW") for a minor modification of construction permit BNPFT-20130805ACC for translator station W259CC, Immokalee Florida, FACID 156224. This application is requesting a change of antenna to vertical only and an increase of effective radiated power. As the requested channel change does not involve a site modification, this instant request qualifies as a minor change application.

The translator is proposed to continue to provide fill-in service for AM station WAFZ, Immokalee Florida and will operate from the currently authorized WAFZ (AM) tower structure ASRN 1232993. BMW has obtained written permission from Glades Media Company, LLP, licensee of WAFZ, to rebroadcast the AM station on the translator facility.

FILL-IN STATUS

BMW certifies that the proposal is for a fill-in translator entirely within the primary station's protected contour and a 25-mile radius centered at the AM primary station's transmitter site. As the FM translator operates from the licensed tower for WAFZ(AM) this facility meets the required compliance. The map attached as Attachment 5 demonstrates this further.

OVERLAP REQUIREMENTS

The Map of Contours as Attachment 1 and Channel Study Data Chart as Attachment 2 depict the proposed allocation situation with respect to all pertinent co and adjacent facilities. All facilities have been depicted utilizing either the maximum ERP or directional pattern data as on file with the commission and 1 degree radial intervals on close in contours in the interest of accuracy. AAT data for the proposed facility was derived from the FCC's 30 second database, ComStudy.

As seen on the Map of Contours, channel 259-D is operable at the proposed location with the proposed antenna and technical parameters with the following facility notes:

- In compliance with 47 CFR 74.1204(g) the proposed facility operates at an effective radiated power which is over 100 watts, protection to intermediate frequency facilities has been calculated and meets all mileage separation requirements.
- The proposed location is partially within the protected 60dbu (50,50) contour of second-adjacent station WWCN(FM) Channel 257-C2 located 50.6 km away. Therefore, an interference analysis has been conducted based on the u/d ratio of +40 db at the proposed site. The signal of WWCN(FM) at the proposed location is 60.0 dbu (50,50) making the relevant interfering contour of the proposed facility 100.0 dbu (50,10). The free space distance to this contour in a worse-case scenario utilizing a single dipole antenna is 1,109 meters.
- The proposed location is within the protected 60dbu (50,50) contour of second-adjacent station WZJZ (FM) Channel 261-C1 located 55.4km away. Therefore, an interference analysis has been conducted based on the u/d ratio of +40 db at the proposed site. The signal of WZJZ(FM) at the proposed location is 63.4 dbu (50,50) making the relevant interfering contour of the proposed facility 103.4 dbu (50,10). The free space distance to this contour in a worse-case scenario utilizing a single dipole antenna is 750 meters.
- The aerial photograph in Attachment 3 is an accurate depiction of the tower location and the surrounding area. As noted on the photo, there is a clear area extending 300 meters in each direction from the tower where there is no general public access.
- The applicant proposes the use of a vertically polarized ground plane antenna, Scala model GP-FM (designated "SCA" and "GP-FM" in the Tech Box) with the characteristics noted in Attachment 4 to minimize the downward radiation of the facility. As noted on the vertical radiation chart, the signal from the worse case interfering contour – that being the WWCN(FM) 100dBu (50,10) – reaches a point 2 meters above the ground at that point at 300 meters from the tower at a depression angle of -11 degrees from horizontal, or -101 degrees from the radiating element of the vertical ground plane antenna.
- As this value exceeds the tabular data maximum of -90 degrees, the radiation of the antenna at this angle approaches zero. Therefore, neither of the interfering contours is capable of reaching any location where the general public would be present.

Based on this showing, a waiver of section 74.1204 is requested in accordance with *Living Way Ministries, Inc.* (FCC 08-242) on the basis of zero population in the area of interference.

ENVIRONMENTAL PROTECTION ACT

The proposed facility is excluded from environmental processing under 47. C.F.R. section 1.1306 in that the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments. Applicant has determined compliance through the use of the RF worksheets.

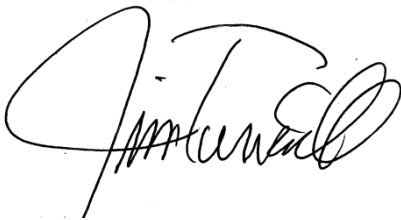
BMW also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

Attachments:

- 1- Map of Interfering Contours
- 2- Channel Study Data Chart
- 3- Aerial Photo of Tower Area
- 4- Antenna Vertical Radiation Data
- 5- Primary Station Contour vs Proposed Fill-in Translator Contour Map

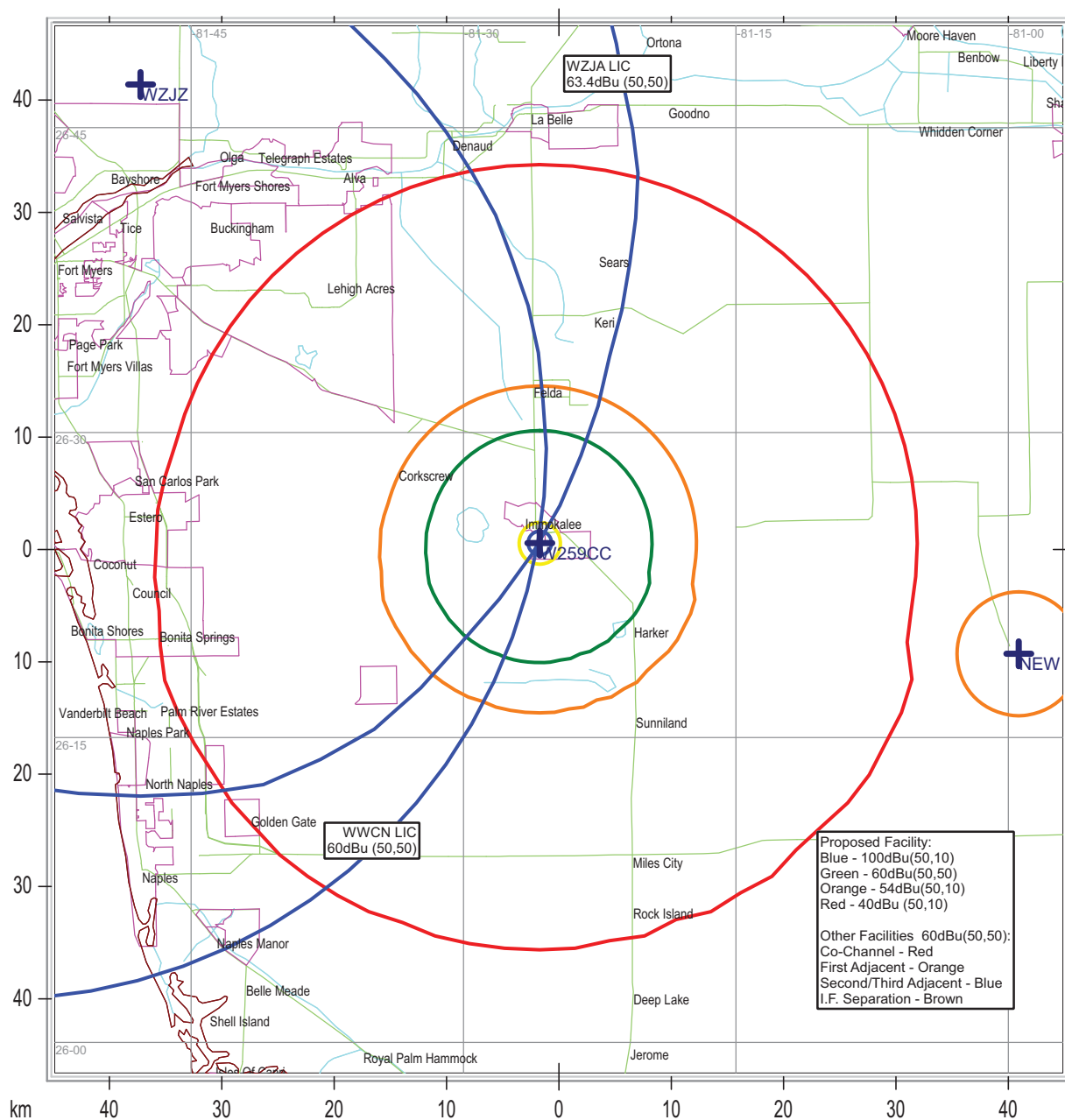
In summary, it was determined that the new proposed operation at Immokalee, Florida on Channel 259-D can meet all of the technical requirements under current FCC rules.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jim Turvaille', with a large, stylized initial 'J' and 'T'.

Jim Turvaille
SBE Certified Senior Radio Engineer

Exhibit #13 Attachment #1
Black Media Works, Inc



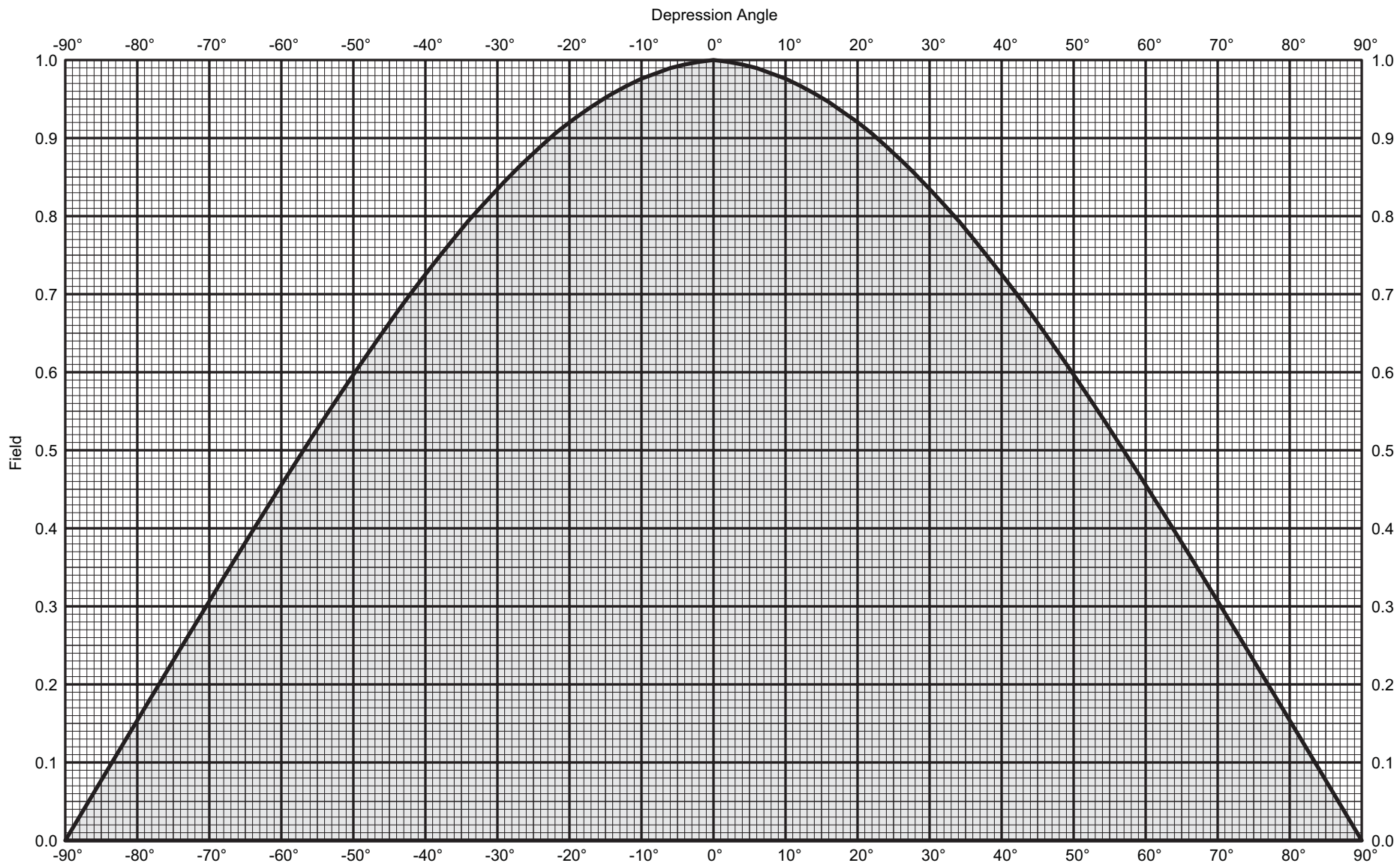
State Borders City Borders Highways Water Features Lat/Lon Grid

ComStudy 2.2
Search of channel 259
(99.7 MHz Class D)
at
26-24-34.0 N, 81-25-48.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
WWCN	FORT MYERS BEACH	FL 257 C2	50.56	0.00	280.0	-17.95 dB
	(Adjacent Channel Waiver Requested in Narrative)					
WZJZ	PORT CHARLOTTE	FL 261 C1	55.37	0.00	319.0	-3.89 dB
	(Adjacent Channel Waiver Requested in Narrative)					
NEW	BIG CYPRESS	FL 258 LP100	45.00	13.00	102.9	15.78 dB
WKIS	BOCA RATON	FL 260 C0	130.23	0.00	111.9	16.98 dB
WKIS	BOCA RATON	FL 260 C0	133.74	0.00	110.0	21.85 dB
WEDR	MIAMI	FL 256 C1	131.46	0.00	111.7	22.29 dB
WJKD	VERO BEACH	FL 259 C2	175.74	0.00	32.9	23.72 dB
W259BX	PORT SALERNO	FL 259 D	146.57	0.00	56.2	26.17 dB
WEDR	MIAMI	FL 256 C1	131.48	0.00	111.7	28.21 dB
WBVL-LP	BUENA VENTURA LAKES	FL 259 LP100	212.75	24.00	0.3	32.55 dB
WBVL-LP	BUENA VENTURA LAKES	FL 259 LP100	212.75	24.00	0.3	32.51 dB
WVOJ	AVON PARK	FL 256 C3	122.45	0.00	355.3	33.91 dB
WQYK-FM	ST. PETERSBURG	FL 258 C1	194.20	0.00	330.6	34.75 dB
WLLY-FM	PALM BEACH GARDENS	FL 258 A	140.19	0.00	73.5	34.97 dB
WAIL	KEY WEST	FL 258 C1	192.12	0.00	182.4	34.34 dB
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880523MF	VERO BEACH	FL 259 C2	183.61	0.00	30.7	34.21 dB
WCTH	PLANTATION KEY	FL 262 C1	182.12	0.00	151.8	35.52 dB
NEW	MIRAMAR	FL 258 LP100	122.83	13.00	111.8	35.70 dB
W260CA	SEBRING	FL 260 D	122.45	0.00	355.3	35.79 dB
WLLY-FM	PALM BEACH GARDENS	FL 258 A	141.63	0.00	71.8	36.08 dB
NEW	HIALEAH	FL 258 LP100	127.54	13.00	119.3	36.50 dB
NEW	FORT LAUDERDALE	FL 258 LP100	129.01	13.00	102.5	36.97 dB
NEW	HIALEAH GARDENS	FL 258 LP100	133.95	13.00	118.7	37.67 dB
NEW	HALLANDALE	FL 258 LP100	133.74	13.00	110.0	37.65 dB
NEW	ORLANDO	FL 259 LP100	241.32	24.00	1.0	37.64 dB
WAIL	KEY WEST	FL 258 C1	194.23	0.00	183.2	37.05 dB
WBVL-LP	BUENA VENTURA LAKES	FL 259 LP100	209.56	24.00	1.8	37.63 dB
NEW	LONGWOOD	FL 259 LP100	247.72	24.00	358.4	38.46 dB
WQYK-FM	ST. PETERSBURG	FL 258 C1	194.21	0.00	330.6	38.32 dB
WQYK-FM	ST. PETERSBURG	FL 258 C1	194.21	0.00	330.6	38.32 dB
NEW	MIAMI SHORES	FL 258 LP100	136.54	13.00	115.4	38.12 dB
WKIS	BOCA RATON	FL 260 C0	133.74	0.00	110.0	38.70 dB
W260CL	WEST PALM BEACH	FL 260 D	140.19	0.00	73.5	39.00 dB
WRUM	ORLANDO	FL 262 C	243.14	0.00	8.2	39.92 dB



300m Radius
No Public Access



GP-FM Groundplane

FM

Maximum gain: 0.0 dBd

Vertical polarization

Vertical radiation pattern

0 degree electrical downtilt



GP-FM Groundplane

FM

Maximum gain: 0.0 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	0.00	1.00	45	0.663	-3.57	-3.57	0.44
1	0.999	-0.01	-0.01	1.00	46	0.650	-3.74	-3.74	0.42
2	0.998	-0.02	-0.02	1.00	47	0.637	-3.92	-3.92	0.41
3	0.996	-0.03	-0.03	0.99	48	0.624	-4.10	-4.10	0.39
4	0.994	-0.05	-0.05	0.99	49	0.610	-4.29	-4.29	0.37
5	0.992	-0.07	-0.07	0.98	50	0.597	-4.48	-4.48	0.36
6	0.990	-0.09	-0.09	0.98	51	0.583	-4.68	-4.68	0.34
7	0.986	-0.12	-0.12	0.97	52	0.570	-4.89	-4.89	0.32
8	0.983	-0.15	-0.15	0.97	53	0.555	-5.11	-5.11	0.31
9	0.979	-0.18	-0.18	0.96	54	0.541	-5.33	-5.33	0.29
10	0.976	-0.21	-0.21	0.95	55	0.527	-5.56	-5.56	0.28
11	0.972	-0.25	-0.25	0.94	56	0.513	-5.79	-5.79	0.26
12	0.967	-0.29	-0.29	0.94	57	0.499	-6.04	-6.04	0.25
13	0.962	-0.33	-0.33	0.93	58	0.485	-6.29	-6.29	0.23
14	0.957	-0.38	-0.38	0.92	59	0.470	-6.56	-6.56	0.22
15	0.952	-0.43	-0.43	0.91	60	0.456	-6.83	-6.83	0.21
16	0.946	-0.48	-0.48	0.90	61	0.441	-7.12	-7.12	0.19
17	0.940	-0.54	-0.54	0.88	62	0.426	-7.41	-7.41	0.18
18	0.933	-0.60	-0.60	0.87	63	0.411	-7.71	-7.71	0.17
19	0.927	-0.66	-0.66	0.86	64	0.397	-8.03	-8.03	0.16
20	0.920	-0.72	-0.72	0.85	65	0.382	-8.36	-8.36	0.15
21	0.913	-0.79	-0.79	0.83	66	0.367	-8.71	-8.71	0.13
22	0.906	-0.86	-0.86	0.82	67	0.352	-9.07	-9.07	0.12
23	0.897	-0.94	-0.94	0.81	68	0.337	-9.45	-9.45	0.11
24	0.889	-1.02	-1.02	0.79	69	0.322	-9.85	-9.85	0.10
25	0.881	-1.10	-1.10	0.78	70	0.307	-10.27	-10.27	0.09
26	0.872	-1.19	-1.19	0.76	71	0.291	-10.71	-10.71	0.08
27	0.863	-1.28	-1.28	0.74	72	0.276	-11.17	-11.17	0.08
28	0.854	-1.37	-1.37	0.73	73	0.261	-11.67	-11.67	0.07
29	0.844	-1.47	-1.47	0.71	74	0.246	-12.19	-12.19	0.06
30	0.835	-1.57	-1.57	0.70	75	0.231	-12.75	-12.75	0.05
31	0.825	-1.67	-1.67	0.68	76	0.215	-13.34	-13.34	0.05
32	0.815	-1.78	-1.78	0.66	77	0.200	-13.98	-13.98	0.04
33	0.805	-1.89	-1.89	0.65	78	0.185	-14.67	-14.67	0.03
34	0.794	-2.00	-2.00	0.63	79	0.169	-15.42	-15.42	0.03
35	0.783	-2.12	-2.12	0.61	80	0.154	-16.25	-16.25	0.02
36	0.772	-2.25	-2.25	0.60	81	0.139	-17.16	-17.16	0.02
37	0.760	-2.38	-2.38	0.58	82	0.123	-18.18	-18.18	0.02
38	0.749	-2.51	-2.51	0.56	83	0.108	-19.34	-19.34	0.01
39	0.737	-2.65	-2.65	0.54	84	0.092	-20.68	-20.68	0.01
40	0.725	-2.79	-2.79	0.53	85	0.077	-22.26	-22.26	0.01
41	0.713	-2.93	-2.93	0.51	86	0.062	-24.20	-24.20	0.00
42	0.701	-3.08	-3.08	0.49	87	0.046	-26.70	-26.70	0.00
43	0.689	-3.24	-3.24	0.47	88	0.031	-30.22	-30.22	0.00
44	0.676	-3.40	-3.40	0.46	89	0.015	-36.24	-36.24	0.00
					90	0.010	-40.00	-40.00	0.00

SCALA GP-FM Ground Plane Vertically Polarized FM Antenna

Frequency =

99.7
100

 Mhz
Interfering Contour

100

 dBu (50,10)

ERP Watts =

250

Degrees	Rel. Field	Power	Distance to Contour	Degrees	Rel. Field	Power	Distance to Contour
1	1.000	250.0	1109.0982	46	0.650	105.6	720.9138
2	0.999	249.5	1107.9891	47	0.637	101.4	706.4956
3	0.998	249.0	1106.8800	48	0.624	97.3	692.0773
4	0.996	248.0	1104.6618	49	0.610	93.0	676.5499
5	0.992	246.0	1100.2254	50	0.597	89.1	662.1316
6	0.990	245.0	1098.0072	51	0.583	85.0	646.6043
7	0.986	243.0	1093.5708	52	0.570	81.2	632.1860
8	0.983	241.6	1090.2435	53	0.555	77.0	615.5495
9	0.979	239.6	1085.8071	54	0.541	73.2	600.0221
10	0.976	238.1	1082.4799	55	0.527	69.4	584.4948
11	0.972	236.2	1078.0435	56	0.513	65.8	568.9674
12	0.967	233.8	1072.4980	57	0.499	62.3	553.4400
13	0.962	231.4	1066.9525	58	0.485	58.8	537.9126
14	0.957	229.0	1061.4070	59	0.470	55.2	521.2762
15	0.952	226.6	1055.8615	60	0.456	52.0	505.7488
16	0.946	223.7	1049.2069	61	0.441	48.6	489.1123
17	0.940	220.9	1042.5523	62	0.426	45.4	472.4758
18	0.933	217.6	1034.7886	63	0.411	42.2	455.8394
19	0.927	214.8	1028.1340	64	0.397	39.4	440.3120
20	0.920	211.6	1020.3704	65	0.382	36.5	423.6755
21	0.913	208.4	1012.6067	66	0.367	33.7	407.0390
22	0.906	205.2	1004.8430	67	0.352	31.0	390.4026
23	0.897	201.2	994.8611	68	0.337	28.4	373.7661
24	0.889	197.6	985.9883	69	0.322	25.9	357.1296
25	0.881	194.0	977.1155	70	0.307	23.6	340.4932
26	0.872	190.1	967.1336	71	0.291	21.2	322.7476
27	0.863	186.2	957.1518	72	0.276	19.0	306.1111
28	0.854	182.3	947.1699	73	0.261	17.0	289.4746
29	0.844	178.1	936.0789	74	0.246	15.1	272.8382
30	0.835	174.3	926.0970	75	0.231	13.3	256.2017
31	0.825	170.2	915.0060	76	0.215	11.6	238.4561
32	0.815	166.1	903.9150	77	0.200	10.0	221.8196
33	0.805	162.0	892.8241	78	0.185	8.6	205.1832
34	0.794	157.6	880.6240	79	0.169	7.1	187.4376
35	0.783	153.3	868.4239	80	0.154	5.9	170.8011
36	0.772	149.0	856.2238	81	0.139	4.8	154.1647
37	0.760	144.4	842.9146	82	0.123	3.8	136.4191
38	0.749	140.3	830.7146	83	0.108	2.9	119.7826
39	0.737	135.8	817.4054	84	0.092	2.1	102.0370
40	0.725	131.4	804.0962	85	0.077	1.5	85.4006
41	0.713	127.1	790.7870	86	0.062	1.0	68.7641
42	0.701	122.9	777.4778	87	0.046	0.5	51.0185
43	0.689	118.7	764.1687	88	0.031	0.2	34.3820
44	0.676	114.2	749.7504	89	0.015	0.1	16.6365
45	0.663	109.9	735.3321	90	0.010	0.0	0.0000

Exhibit #13 Attachment #5
Black Media Works, Inc

