

Non-Interference Compliance

Regarding Facility id 147546

Channel 237

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.

Pages 9 and 10 of this exhibit are aerial photos 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 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.

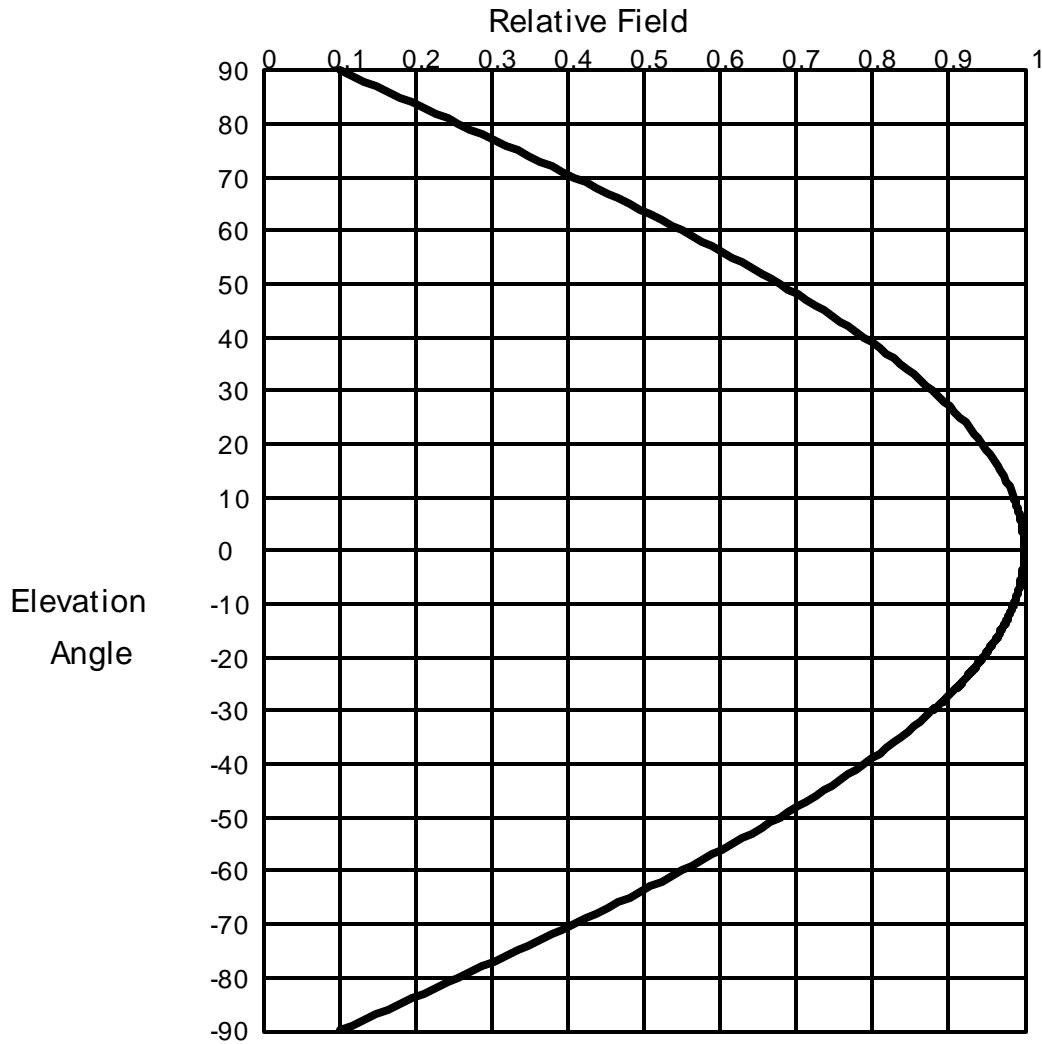
Application_id	File Number	Callsign	Contour at Tower	Min. Contour
177864	BLH19921014KE	WREW	89.1	89.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				89.1

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 **89.1 dBμ**, this makes the proposed translator's worst-case interfering contour **129.1 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **38.9 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 **33.8 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. Hence, 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:	SWR
Antenna Model:	FM1
CORAGL:	54 m
Maximum ERP:	0.25 kW
Interfering Contour:	129.1 dBμ
Max Int. Contour Distance:	38.9 m
Min Ground Clearance:	33.8 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	.997	248.5	38.8	38.6	50.6
10	.986	243.0	38.4	37.8	47.3
15	.969	234.7	37.7	36.4	44.2
20	.946	223.7	36.8	34.6	41.4
25	.916	209.8	35.6	32.3	38.9
30	.879	193.2	34.2	29.6	36.9
35	.837	175.1	32.6	26.7	35.3
40	.789	155.6	30.7	23.5	34.3
45	.736	135.4	28.6	20.2	33.8
50	.679	115.3	26.4	17.0	33.8
55	.616	94.9	24.0	13.7	34.4
60	.550	75.6	21.4	10.7	35.5
65	.480	57.6	18.7	7.9	37.1
70	.408	41.6	15.9	5.4	39.1
75	.333	27.7	13.0	3.4	41.5
80	.256	16.4	10.0	1.7	44.2
85	.178	7.9	6.9	0.6	47.1
90	.100	2.5	3.9	0.0	50.1
Minimum Clearance above TGL:					33.8 m



Elevation Pattern

Scale: Linear

Systems With Reliability Inc.

Units: Field, Relative

CLIENT: *General*

Date: 11/10/03

ANTENNA TYPE: FM1/1

FREQUENCY: 98.1

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/ -0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/ -0.539 dBd

Null Fill(s)(%) : 0, 0, 0

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
3.2	.999 (-0.012)	-4.4	.997 (-0.023)	-12.0	.98 (-0.173)
3.0	.999 (-0.011)	-4.6	.997 (-0.025)	-12.2	.98 (-0.178)
2.8	.999 (-0.009)	-4.8	.997 (-0.027)	-12.4	.979 (-0.184)
2.6	.999 (-0.008)	-5.0	.997 (-0.03)	-12.6	.978 (-0.19)
2.4	.999 (-0.007)	-5.2	.996 (-0.032)	-12.8	.978 (-0.196)
2.2	.999 (-0.006)	-5.4	.996 (-0.035)	-13.0	.977 (-0.203)
2.0	.999 (-0.005)	-5.6	.996 (-0.037)	-13.2	.976 (-0.209)
1.8	1.00 (-0.004)	-5.8	.995 (-0.04)	-13.4	.975 (-0.215)
1.6	1.00 (-0.003)	-6.0	.995 (-0.043)	-13.6	.975 (-0.222)
1.4	1.00 (-0.002)	-6.2	.995 (-0.046)	-13.8	.974 (-0.229)
1.2	1.00 (-0.002)	-6.4	.994 (-0.049)	-14.0	.973 (-0.235)
1.0	1.00 (-0.001)	-6.6	.994 (-0.052)	-14.2	.973 (-0.242)
.8	1.00 (-0.001)	-6.8	.994 (-0.055)	-14.4	.972 (-0.249)
.6	1.00 (0)	-7.0	.993 (-0.058)	-14.6	.971 (-0.256)
.4	1.00 (0)	-7.2	.993 (-0.062)	-14.8	.97 (-0.263)
.2	1.00 (0)	-7.4	.993 (-0.065)	-15.0	.969 (-0.271)
.0	1.00 (0)	-7.6	.992 (-0.069)	-15.2	.969 (-0.278)
-.2	1.00 (0)	-7.8	.992 (-0.073)	-15.4	.968 (-0.285)
-.4	1.00 (0)	-8.0	.991 (-0.076)	-15.6	.967 (-0.293)
-.6	1.00 (0)	-8.2	.991 (-0.08)	-15.8	.966 (-0.3)
-.8	1.00 (-0.001)	-8.4	.99 (-0.084)	-16.0	.965 (-0.308)
-1.0	1.00 (-0.001)	-8.6	.99 (-0.088)	-16.2	.964 (-0.316)
-1.2	1.00 (-0.002)	-8.8	.989 (-0.093)	-16.4	.963 (-0.324)
-1.4	1.00 (-0.002)	-9.0	.989 (-0.097)	-16.6	.962 (-0.332)
-1.6	1.00 (-0.003)	-9.2	.988 (-0.101)	-16.8	.962 (-0.34)
-1.8	1.00 (-0.004)	-9.4	.988 (-0.106)	-17.0	.961 (-0.348)
-2.0	.999 (-0.005)	-9.6	.987 (-0.11)	-17.2	.96 (-0.357)
-2.2	.999 (-0.006)	-9.8	.987 (-0.115)	-17.4	.959 (-0.365)
-2.4	.999 (-0.007)	-10.0	.986 (-0.12)	-17.6	.958 (-0.374)
-2.6	.999 (-0.008)	-10.2	.986 (-0.124)	-17.8	.957 (-0.383)
-2.8	.999 (-0.009)	-10.4	.985 (-0.129)	-18.0	.956 (-0.391)
-3.0	.999 (-0.011)	-10.6	.985 (-0.134)	-18.2	.955 (-0.4)
-3.2	.999 (-0.012)	-10.8	.984 (-0.14)	-18.4	.954 (-0.409)
-3.4	.998 (-0.014)	-11.0	.983 (-0.145)	-18.6	.953 (-0.418)
-3.6	.998 (-0.015)	-11.2	.983 (-0.15)	-18.8	.952 (-0.427)
-3.8	.998 (-0.017)	-11.4	.982 (-0.156)	-19.0	.951 (-0.437)
-4.0	.998 (-0.019)	-11.6	.982 (-0.161)	-19.2	.95 (-0.446)
-4.2	.998 (-0.021)	-11.8	.981 (-0.167)	-19.4	.949 (-0.456)

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Page 1 of 2

CLIENT: *General*

Date: 11/10/03

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FREQUENCY: 98.1

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Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/ -0.539 dBd

Null Fill(s)(%) : 0, 0, 0

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
-19.6	.948 (-0.465)	-27.2	.90 (-0.911)	-54.0	.629 (-4.027)
-19.8	.947 (-0.475)	-27.4	.899 (-0.924)	-55.0	.616 (-4.205)
-20.0	.946 (-0.485)	-27.6	.898 (-0.939)	-56.0	.603 (-4.39)
-20.2	.945 (-0.495)	-27.8	.896 (-0.953)	-57.0	.59 (-4.58)
-20.4	.944 (-0.505)	-28.0	.895 (-0.967)	-58.0	.577 (-4.778)
-20.6	.942 (-0.515)	-28.2	.893 (-0.981)	-59.0	.564 (-4.982)
-20.8	.941 (-0.525)	-28.4	.892 (-0.996)	-60.0	.55 (-5.193)
-21.0	.94 (-0.535)	-28.6	.89 (-1.01)	-61.0	.536 (-5.411)
-21.2	.939 (-0.546)	-28.8	.889 (-1.025)	-62.0	.523 (-5.638)
-21.4	.938 (-0.556)	-29.0	.887 (-1.04)	-63.0	.509 (-5.873)
-21.6	.937 (-0.567)	-29.2	.886 (-1.055)	-64.0	.495 (-6.116)
-21.8	.936 (-0.578)	-29.4	.884 (-1.07)	-65.0	.48 (-6.369)
-22.0	.934 (-0.589)	-29.6	.883 (-1.085)	-66.0	.466 (-6.631)
-22.2	.933 (-0.6)	-29.8	.881 (-1.101)	-67.0	.452 (-6.904)
-22.4	.932 (-0.611)	-30.0	.879 (-1.116)	-68.0	.437 (-7.187)
-22.6	.931 (-0.622)	-31.0	.871 (-1.195)	-69.0	.423 (-7.483)
-22.8	.93 (-0.633)	-32.0	.863 (-1.277)	-70.0	.408 (-7.791)
-23.0	.928 (-0.645)	-33.0	.855 (-1.363)	-71.0	.393 (-8.112)
-23.2	.927 (-0.656)	-34.0	.846 (-1.451)	-72.0	.378 (-8.448)
-23.4	.926 (-0.668)	-35.0	.837 (-1.543)	-73.0	.363 (-8.799)
-23.6	.925 (-0.68)	-36.0	.828 (-1.638)	-74.0	.348 (-9.167)
-23.8	.923 (-0.692)	-37.0	.819 (-1.737)	-75.0	.333 (-9.553)
-24.0	.922 (-0.704)	-38.0	.809 (-1.839)	-76.0	.318 (-9.959)
-24.2	.921 (-0.716)	-39.0	.799 (-1.944)	-77.0	.302 (-10.387)
-24.4	.92 (-0.728)	-40.0	.789 (-2.054)	-78.0	.287 (-10.839)
-24.6	.918 (-0.74)	-41.0	.779 (-2.167)	-79.0	.272 (-11.317)
-24.8	.917 (-0.753)	-42.0	.769 (-2.283)	-80.0	.256 (-11.826)
-25.0	.916 (-0.765)	-43.0	.758 (-2.404)	-81.0	.241 (-12.367)
-25.2	.914 (-0.778)	-44.0	.747 (-2.529)	-82.0	.225 (-12.946)
-25.4	.913 (-0.791)	-45.0	.736 (-2.658)	-83.0	.21 (-13.569)
-25.6	.912 (-0.803)	-46.0	.725 (-2.791)	-84.0	.194 (-14.241)
-25.8	.91 (-0.816)	-47.0	.714 (-2.928)	-85.0	.178 (-14.97)
-26.0	.909 (-0.83)	-48.0	.702 (-3.071)	-86.0	.163 (-15.768)
-26.2	.908 (-0.843)	-49.0	.69 (-3.217)	-87.0	.147 (-16.648)
-26.4	.906 (-0.856)	-50.0	.679 (-3.369)	-88.0	.131 (-17.627)
-26.6	.905 (-0.87)	-51.0	.666 (-3.525)	-89.0	.116 (-18.733)
-26.8	.903 (-0.883)	-52.0	.654 (-3.687)	-90.0	.10 (-20)
-27.0	.902 (-0.897)	-53.0	.642 (-3.854)	90.0	.00 (-50)

Systems With Reliability Inc.

Page 2 of 2

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FREQUENCY: 98.1

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DIRECTIVITY(Peak): 0.883/ -0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/ -0.539 dBd

Null Fill(s)(%) : 0, 0, 0

Adjacent Channel Study **For Station NEW, Facility_id: 147546**

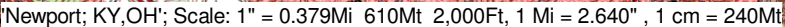
Co-channel through third adjacent:

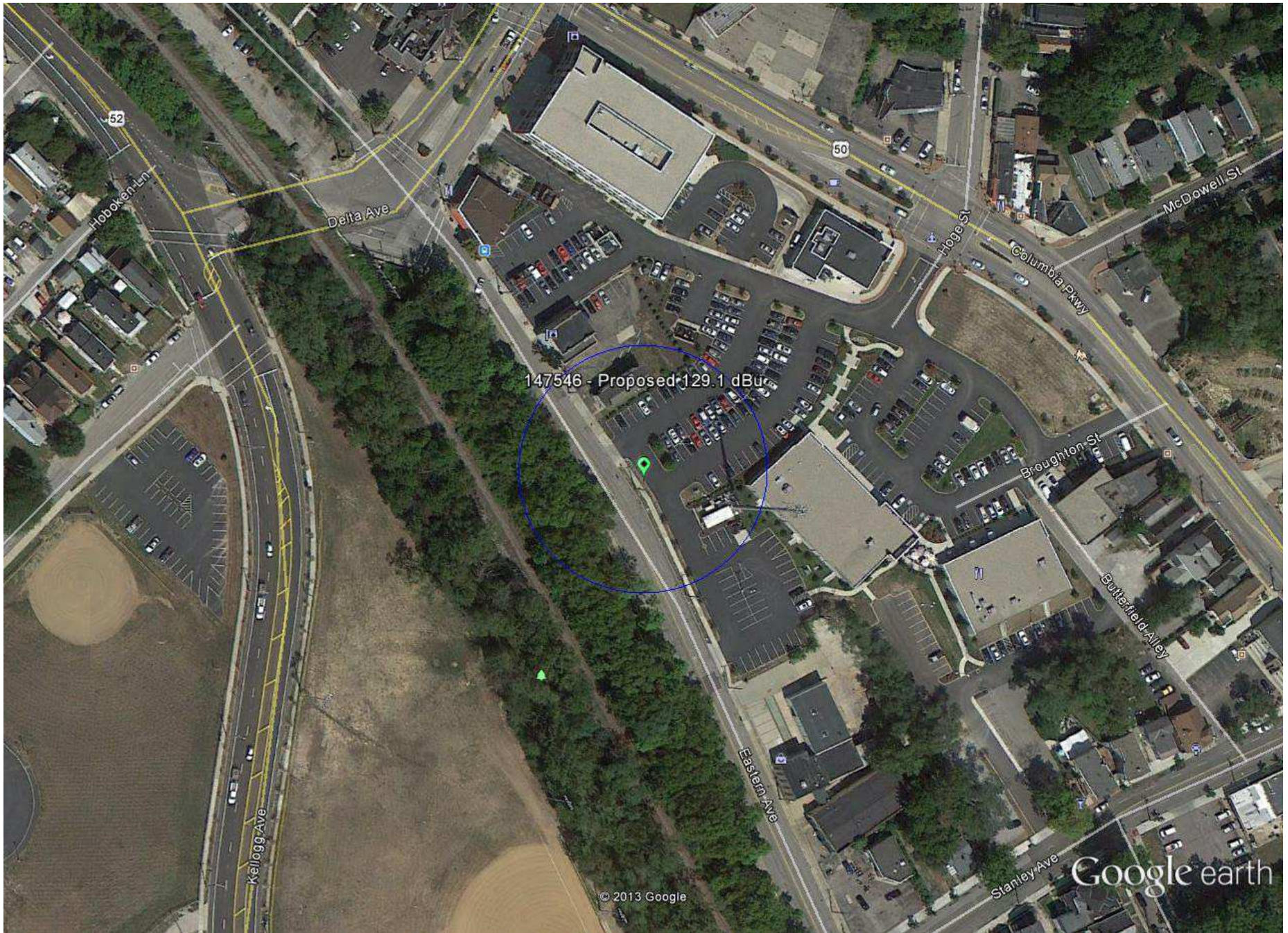
App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
177864	73369	BLH-19921014KE	WREW	CINCINNATI FCC LICENSE SUB, LLC	B	FAIRFIELD	OH	LIC	10.5	542	235	2	11.8	7.0679
1534259	138889	BPFT-20121220AAE	W292DT	EDUCATIONAL MEDIA FOUNDATION	D	AUBURN	OH	CP	0.07	345	238	1	28	0
299865	55249	BLH-6405	WKID	DIAL BROADCASTING INC	A	VEVAY	IN	LIC	2.8	324	240	3	59.8	0
575785	15649	BMLH-20010810AAN	WZLR	COX RADIO, INC.	A	XENIA	OH	LIC	6	388	237	0	74	0
220254	62216	BLH-19960207KA	WFTM-FM	STANDARD TOBACCO COMPANY, INC.	A	MAYSVILLE	KY	LIC	3	333	240	3	77.6	0
181900	72388	BLH-19930212KD	WIKI	WAGON WHEEL BROADCASTING, LLC	A	CARROLLTON	KY	LIC	1.8	337	237	0	88.4	0
245741	21719	BMLH-19970506KC	WFLE-FM	DREAMCATCHER COMMUNICATIONS, INC.	A	FLEMINGSBURG	KY	LIC	2.35	444	236	1	108.1	0
1434833	73908	BLH-20110712ABT	WHIO-FM	COX RADIO, INC.	B	PLEASANT HILL	OH	LIC	50	444	239	2	123.1	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
1421741	54833	BMLED-20110330ACO	WNKN	NORTHERN KENTUCKY UNIVERSITY	B	MIDDLETOWN	OH	LIC	34	419	290	53	45.1	30.1

4162 III NW
(CINCINNATI EAST)





Google earth

feet
meters





50 yds