

## **Non-Interference Compliance**

Regarding Facility id 156326

Channel 252

### **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 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 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: The only structures within the zone of predicted 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.**

### 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
208701	BLH19950502KA	KLUK	62.8	62.8
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>62.8</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 **62.8 dBμ**, this makes the proposed translator's worst-case interfering contour **102.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **803.5 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

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**Antenna Manufacturer:** SCA  
**Antenna Model:** YA7-FML(V) @ 45°  
**CORAGL:** 7 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 102.8 dBμ  
**Max Int. Contour Distance:** 803.5 m

# **Adjacent Channel Study** **For Station K252FF, Facility\_id: 156326**

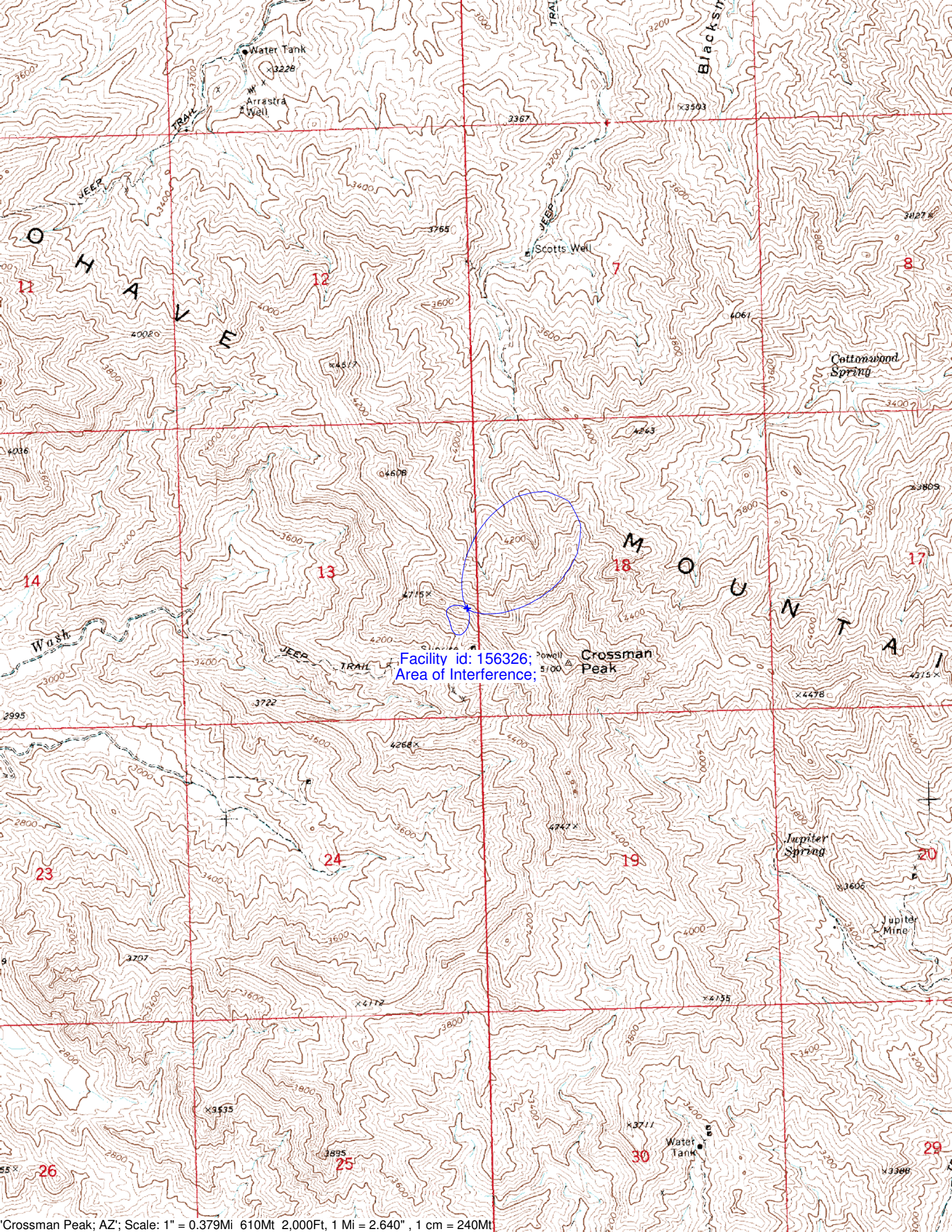
## **Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1571572	156420	BNPFT-20130828AFI	K254CE	DONALD F. HENDREN	D	NOTHING	AZ	CP	0.25	1456	254	2	0	0.2399
1550855	8385	BPH-20130430ABE	KLUK	CAMERON BROADCASTING, INC.	C	NEEDLES	CA	CP	100	1254	250	2	56	0.2399
208701	8385	BLH-19950502KA	KLUK	CAMERON BROADCASTING, INC.	C1	NEEDLES	CA	LIC	29.5	1260	250	2	56.1	0.2399
1118837	34556	BLH-20060320ADE	KHWY	KHWY, INC.	B	ESSEX	CA	LIC	9	1136	255	3	87.9	0
1570845	157256	BNPFT-20130826ADI	K249EU	DONALD F. HENDREN	D	QUARTZ SITE	AZ	CP	0.25	112	249	3	113.2	0
1689196	156429	BLFT-20150923AAF	K254CB	ADVANCE MINISTRIES, INC D/B/A	D	PRESCOTT	AZ	LIC	0.25	2137	254	2	151.9	0
1716450	156429	BPFT-20151229ARC	K254CB	ADVANCE MINISTRIES, INC D/B/A	D	PRESCOTT	AZ	CP	0.25	2179	254	2	152.3	0
1145689	41462	BLH-20060831AAC	KKFR	RIVIERA BROADCASTING, LLC	C	MAYER	AZ	LIC	41	2385	252	0	171.3	0
97707	47744	BLH-19870211KA	KLUC-FM	CBS RADIO STATIONS INC.	C	LAS VEGAS	NV	LIC	97	1050	253	1	177.9	0
1235791	177829	BNPH-20080225ABD	NEW	WILLIAM KONOPNICKI	C1	MCNARY	AZ	APP	100	2521	249	3	402	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
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Facility id: 156326;  
Area of Interference;



