

Non-Interference Compliance

Regarding Facility id 147149

Channel 248

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: There are no occupied buildings within the zone of predicted interference 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
99164	BLH19870320KD	KSEQ	65.5	65.5
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				65.5

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 **65.5 dBμ**, this makes the proposed translator's worst-case interfering contour **105.5 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **117.8 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").

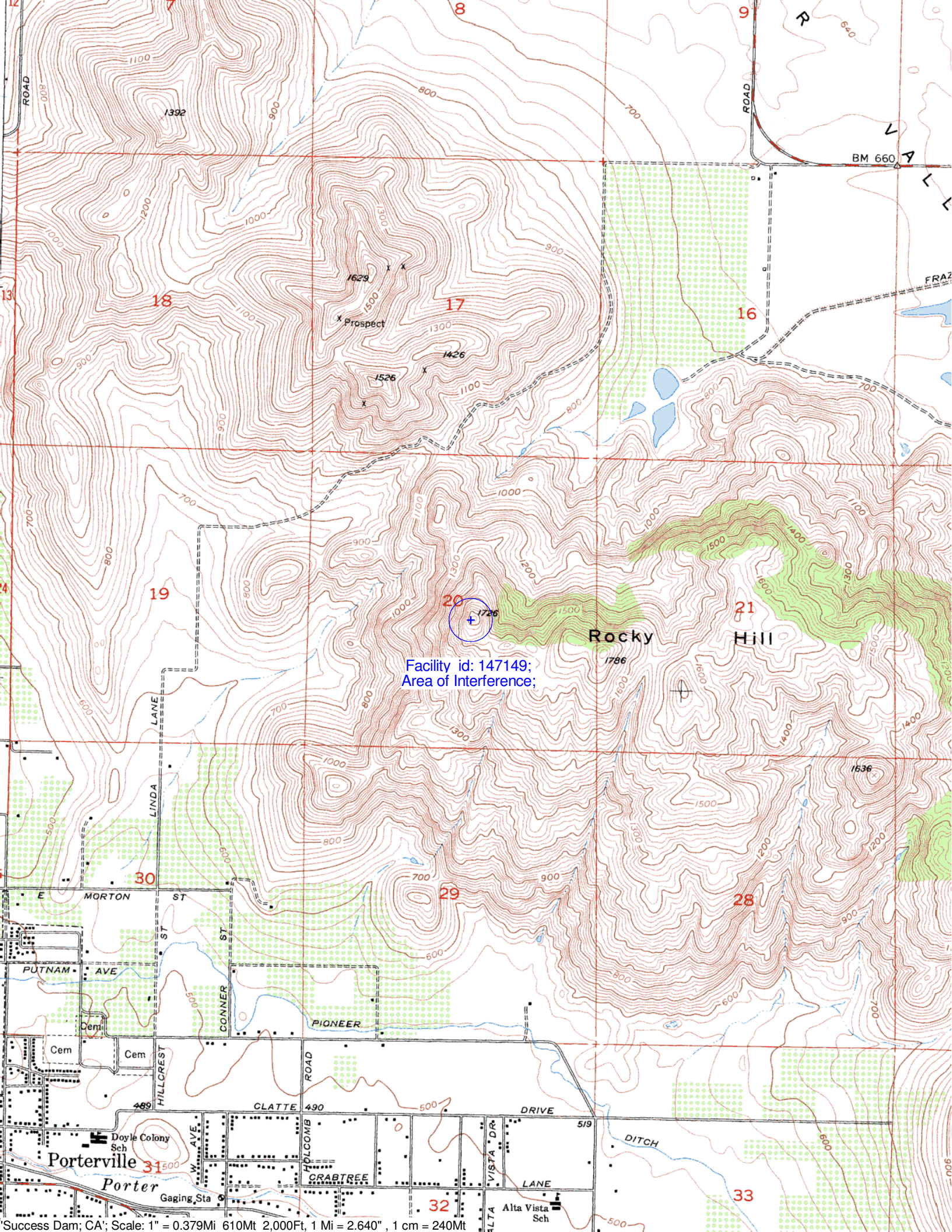
Note: There are no occupied buildings within the zone of predicted interference so a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

Antenna Manufacturer:	SWR
Antenna Model:	FM1
CORAGL:	18 m
Maximum ERP:	0.01 kW
Interfering Contour:	105.5 dBμ
Max Int. Contour Distance:	117.8 m

Adjacent Channel Study **For Station NEW, Facility_id: 147149**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
99164	7717	BLH-19870320KD	KSEQ	BUCKLEY COMMUNICATIONS, INC.	B	VISALIA	CA	LIC	17	1582	246	2	61.1	0.2376
650768	157367	BNPFT-20030317LVD	NEW	EVELYN CHRISTINE ROWAN	D	HANFORD	CA	APP	0.25	108	249	1	66.3	0
561937	8109	BLH-20010420AAX	KSMJ	BUCKLEY BROADCASTING OF CALIFORNIA, LLC	A	SHAFTER	CA	LIC	4.1	324	249	1	69.9	0
641945	149107	BNPFT-20030317ADT	NEW	LAKE HAVASU CHARTER SCHOOL, INC.	D	BAKERSFIELD	CA	APP	0.009	2285	247	1	78.5	0
1447674	183302	BLH-20111004AAT	KRJK	BUCK OWENS PRODUCTION COMPANY, INCORPORA	A	LAMONT	CA	LIC	2	838	247	1	101.9	0
1126465	11622	BLH-20060503ABA	KEBT	AGM CALIFORNIA, INC.	B1	LOST HILLS	CA	LIC	15.5	656	245	3	107.9	0
265644	18409	BLH-19980408KB	KMGV	PEAK BROADCASTING OF FRESNO LICENSES, LL	B	FRESNO	CA	LIC	2.1	1439	250	2	117.3	0
1416880	166068	BLH-20110222ADS	KQNO	MAGNOLIA RADIO CORPORATION	B1	COALINGA	CA	LIC	6.5	544	247	1	132.7	0
1415298	3159	BPH-20110218ABW	KYGA	CUMULUS LICENSING LLC	B	GOLETA	CA	CP	16	1252	248	0	195.3	0
62229	3159	BMLH-19831018AA	KYGA	CUMULUS LICENSING LLC	B	SANTA BARBARA	CA	LIC	16	1252	248	0	195.4	0
1488389	190224	BNPH-20120221ACZ	NEW	GRENAX BROADCASTING II, LLC	C2	MUNDS PARK	AZ	APP	5	2622	246	2	686.5	0
1198753	150097	BLFT-20070806AAT	K246BI	RADIO ASSIST MINISTRY, INC.	D	WINSLOW	AZ	LIC	0.025	1483	246	2	758	0
1100065	0	RM-bg-144*	Null		C	FIRST MESA	AZ	DEL	0	0	247	1	776.6	0
1492138	0	RM-11669	Null		C	FIRST MESA	AZ	DEL	0	0	247	1	776.6	0
1269556	0	RM-11518	Null		C	FIRST MESA	AZ	DEL	0	0	247	1	776.6	0
1506919	0	RM-11517	Null		C	FIRST MESA	AZ	DEL	0	0	247	1	776.6	0
1099113	0	RM-bg-143*	Null		C	FIRST MESA	AZ	DEL	0	0	247	1	776.6	0
1419081	37577	BSTA-20110228ADC	KRDE	LINDA C. CORSO	C1	SAN CARLOS	AZ	APP	2.1	2378	247	1	805.7	0





70 yds