

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 49217

Channel 217

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 μ 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 buildings or major roads 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
1081158	BLED20050826AAJ	KVNF	82.4	82.4
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				82.4

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 **82.4 dBμ**, this makes the proposed translator's worst-case interfering contour **122.4 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **58.3 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 buildings or major roads 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: ODD
Antenna Model: ODD851028TA
CORAGL: 7 m
Maximum ERP: 0.112 kW
Interfering Contour: 122.4 dBμ
Max Int. Contour Distance: 58.3 m

Adjacent Channel Study For Station K219AH, Facility_id: 49217

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1081158	49221	BLED	20050826AAJ	KVNF	NORTH FORK VALLEY PUBLIC RADIO, INC.	A	PAONIA	CO	LIC	2.6	2120	215	2	5.1	1.4918
179759	53753	BLFT	19921209TB	K218BG	PUBLIC BROADCASTING OF COLORADO, INC.	D	MONTROSE	CO	LIC	0.07	1928	218	1	43.3	0
1409601	175928	BLED	20101201ACL	KJOL-FM	UNITED MINISTRIES	A	MONTROSE	CO	LIC	0.475	1794	220	3	49.3	0
124561	52698	BLFT	19890224TI	K215BD	PITKIN COUNTY TRANSLATOR DEPARTMENT	D	REDSTONE	CO	LIC	0.019	2573	215	2	53.9	0
1296460	52698	BPFT	20090217AEW	K215BD	PITKIN COUNTY TRANSLATOR DEPARTMENT	D	REDSTONE	CO	CP	0.02	2654	215	2	54.3	0
273142	86638	BLFT	19980824TB	K219DH	PENSACOLA CHRISTIAN COLLEGE, INC.	D	GRAND JUNCTION	CO	LIC	0.01	3040	219	2	59.5	0
203929	21054	BLFT	19941109TG	K214CA	FAMILY STATIONS, INC.	D	GRAND JUNCTION	CO	LIC	0.01	3036	214	3	59.5	0
1007116	12361	BLED	20040810ABV	KLXV	EDUCATIONAL MEDIA FOUNDATION	C2	GLENWOOD SPRINGS	CO	LIC	0.75	3261	220	3	66.3	0
78020	71962	BLED	19850430LR	KWSB-FM	WESTERN STATE COLLEGE OF COLORADO	A	GUNNISON	CO	LIC	0.135	2627	216	1	71	0
163128	12343	BLFT	19910719TA	K220AH	EDUCATIONAL MEDIA FOUNDATION	D	GUNNISON	CO	LIC	0.021	2632	220	3	71.1	0
1239618	173709	BNPED	20071018AXO	NEW	ACADEMY MEDIA INC.	A	RIFLE	CO	CP	3	2242	215	2	72.3	0
204301	12357	BLFT	19941122TC	K218BP	EDUCATIONAL MEDIA FOUNDATION	D	PARACHUTE	CO	LIC	0.014	2307	218	1	72.3	0
605105	56681	BLFT	20020614AAT	K215AC	ROARING FORK PUBLIC RADIO, INC.	D	SNOWMASS VILLAGE	CO	LIC	0.02	2651	215	2	72.6	0
601842	88582	BLFT	20020501AAK	K216ES	EDUCATIONAL COMMUNICATIONS OF COLORA	D	CARDIFF	CO	LIC	0.014	2283	216	1	78.7	0
161255	3009	BLED	19910514KC	KAJX	ROARING FORK PUBLIC RADIO INC.	A	ASPEN	CO	LIC	0.38	2670	218	1	79.1	0
124562	52692	BLFT	19890224TJ	K216BF	PITKIN COUNTY TRANSLATOR DEPARTMENT	D	ASPEN	CO	LIC	0.019	3185	216	1	79.7	0
155040	53743	BLFT	19901203TG	K218BE	PUBLIC BROADCASTING OF COLORADO, INC.	D	OURAY	CO	LIC	0.1	2937	218	1	90.6	0
1211821	89631	BLED	20071012AOD	KTEI	EDUCATIONAL COMMUNICATIONS OF COLORA	A	PLACERVILLE	CO	LIC	0.25	3359	214	3	101.2	0

Intermediate Frequencies (53 and 54 channels difference):

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
270267	83036	BLFT	19980622TE	K271AE	MBC GRAND BROADCASTING, INC.	D	CEDAREEDGE	CO	LIC	0.25	2387	271	54	31.1	21.1
1357737	184865	BNPED	20100226AHU	NEW	HISPANIC FAMILY CHRISTIAN NETWORK, INC.	C2	OLATHE	CO	APP	50	1657	270	53	43.1	28.1
1358293	185082	BNPED	20100226AJB	NEW	GRAND VALLEY PUBLIC RADIO, INC.	C2	OLATHE	CO	APP	50	1620	270	53	44.5	29.5
1357618	184831	BNPED	20100226ADC	NEW	CALVARY CHAPEL OF MONTROSE	C2	OLATHE	CO	APP	50	1638	270	53	44.6	29.6
1358315	185097	BNPED	20100226AFP	NEW	MONTROSE CHRISTIAN BROADCASTING CORPOI	C2	OLATHE	CO	APP	50	1873	270	53	49.7	34.7
1358120	185017	BNPED	20100226ACN	NEW	JKJ EDUCATIONAL FOUNDATION	C2	OLATHE	CO	APP	50	1815	270	53	49.7	34.7
643714	150655	BNPFT	20030317CWR	NEW	RADIO ASSIST MINISTRY, INC.	D	GRAND JUNCTION	CO	APP	0.115	1553.4	270	53	78.3	68.3

272,000

273,000

274,000

275,000

276,000

4461 (1 MI)
'RESERVOIR)

UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY

107° 37' 30"
38° 52' 30"

T. 13 S
T. 14 S

405900m N

DELTA (VIA COLO. 93) 27 MI
PO. (PAVSS 7 MI)

4303

4302

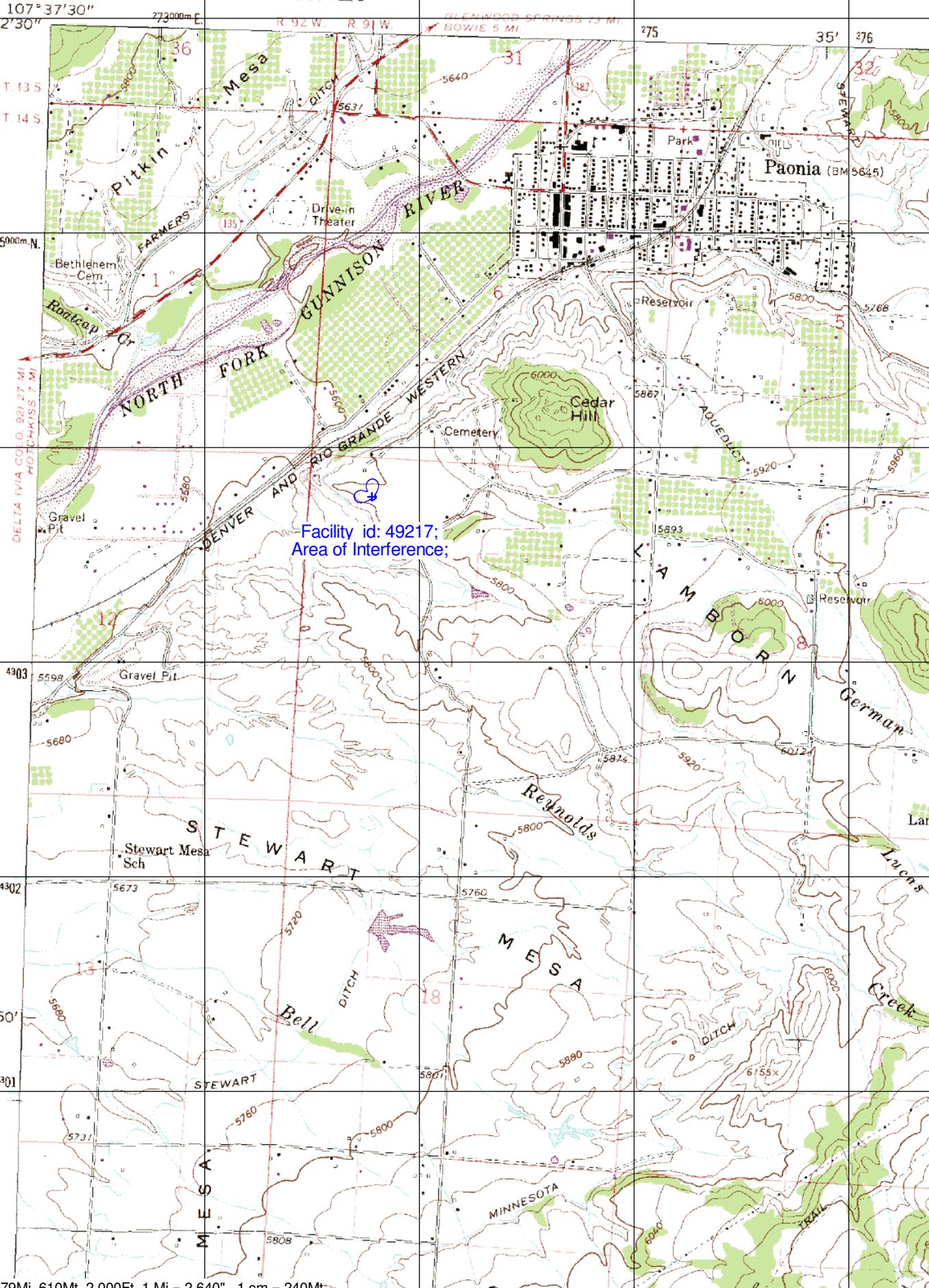
4301

50'

5808

5807

5806



Facility id: 49217;
Area of Interference;

