

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 150214

Channel 288

### **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 $\mu$  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 zone of predicted interference extends 2.5m from the transmit site. There are no buildings or major roads within this zone 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>
666376	BMLH20030612ADV	KMJX	99	99
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>99</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 **99 dBμ**, this makes the proposed translator's worst-case interfering contour **139 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **2.5 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"). 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.

**Note: The zone of predicted interference extends 2.5m from the transmit site. There are no buildings or major roads within this zone 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:** WRL  
**Antenna Model:** FMPV1  
**CORAGL:** 4 m  
**Maximum ERP:** 0.01 kW  
**Interfering Contour:** 139 dBμ  
**Max Int. Contour Distance:** 2.5 m

**Adjacent Channel Study**  
**For Station K288EZ, Facility\_id: 150214**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1081465	39689	BXLH	20050927ALE	KMJX	CC LICENSES, LLC	C1	CONWAY	AR	LIC	16.5	425	286	2	11.1	0.0597
666376	39689	BMLH	20030612ADV	KMJX	CC LICENSES, LLC	C1	CONWAY	AR	LIC	79	448	286	2	11.1	0.0597
1363710	39689	BXLH	20100413AHV	KMJX	CC LICENSES, LLC	C1	CONWAY	AR	LIC	3.8	189	286	2	13.8	0.0597
686122	150208	BNPFT	20030829AKS	NEW	RADIO ASSIST MINISTRY, INC.	D	GREENBRIER	AR	APP	0.035	305	288	0	53.9	0
643159	150208	BNPFT	20030317BYK	NEW	RADIO ASSIST MINISTRY, INC.	D	GREENBRIER	AR	APP	0.062	326.7	288	0	55.4	0
1358084	150219	BLFT	20100224ACC	K288FP	NOALMARK BROADCASTING CORPORATION	D	HOT SPRINGS	AR	LIC	0.25	258	288	0	64.6	0
1177710	164210	BLH	20070320ANC	KFXV	MALVERN ENTERTAINMENT CORPORATION	C3	KENSETT	AR	LIC	15	229.2	289	1	74.8	0
130192	48947	BLH	19890619KC	KLAZ	NOALMARK BROADCASTING CORPORATION	C1	HOT SPRINGS	AR	LIC	95	465	290	2	80.1	0
618345	76511	BLH	20021114ABC	KYEL	DANVILLE FM, INC.	A	DANVILLE	AR	LIC	4.4	247	288	0	83	0
152254	57192	BLH	19900911KD	KFFB	FREEDOM BROADCASTING, INC	C2	FAIRFIELD BAY	AR	LIC	15.5	585	291	3	100.1	0



Facility id: 150214;  
Area of Interference;



150214 - Proposed 139 dBu

32 m  
Imagery Date: 9/4/2010

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34°50'15.80" N 92°22'51.17" W elev 82 m

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Eye alt 309 m