

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 151073

Channel 266

### **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: 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 dB $\mu$  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>
677091	BLH20030805AOY	KIXV	82.6	82.6
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>82.6</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 **82.6 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **122.6 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **52 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:** NIC  
**Antenna Model:** BKG77 @ 180°  
**CORAGL:** 73 m  
**Maximum ERP:** 0.1 kW  
**Interfering Contour:** 122.6 dB $\mu$   
**Max Int. Contour Distance:** 52 m

## Adjacent Channel Study For Station K266BH, Facility\_id: 151073

### Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
677091	39368	BLH-20030805AOY	KIXV	NOALMARK BROADCASTING CORPORATION	A	MALVERN	AR	LIC	6	264	268	2	9.9	0.4688
291885	24733	BLH-7391	KDEL-FM	NOALMARK BROADCASTING CORPORATION	A	ARKADELPHIA	AR	LIC	3	85	265	1	35.7	0
1359119	49255	BLH-20100308ABI	KZTS	FLINN BROADCASTING CORPORATION	A	CAMMACK VILLAGE	AR	LIC	0.85	394	266	0	56.5	0
1503736	151045	BPFT-20120608ADA	K210EA	FIRST VENTURES CAPITAL PARTNERS, INC.	D	FORDYCE	AR	CP	0.01	90	264	2	67.9	0
260294	78267	BLH-19980112KD	KARV-FM	KERM INC	A	OLA	AR	LIC	0.74	435	267	1	72.3	0
1497339	150992	BLFT-20120425ABU	K265EO	EDGEWATER BROADCASTING, INC.	D	ENGLAND	AR	LIC	0.25	190	265	1	83.9	0
144899	43831	BMLH-19900206KD	KVOM-FM	MMA LICENSE LLC	A	MORRILTON	AR	LIC	6	184	269	3	85.2	0
1441540	150992	BMPFT-20110824BCW	K265EO	EDGEWATER BROADCASTING, INC.	D	STUTTIGART	AR	CP MOD	0.05	75	265	1	93.4	0
1504325	190418	BNPH-20120517AAL	NEW	PATRICK PARKER	C3	PINE BLUFF	AR	CP	13.5	193	267	1	98.5	0
175720	31884	BLH-19920731KB	KWKK	MMA LICENSE LLC	A	RUSSELLVILLE	AR	LIC	6	259	265	1	103.4	0
210164	28114	BLH-19950606KB	KVLO	ARKANSAS COUNTY BROADCASTERS, INC.	A	HUMNOKE	AR	LIC	6	158	269	3	103.8	0
172533	201	BLH-19920410KC	KZHE	A-1 COMMUNICATIONS, INC.	C2	STAMPS	AR	LIC	50	249	263	3	108.9	0
205138	33762	BLH-19941223KA	KBYB	TEXARKANA RADIO CENTER LICENSES, LLC	C2	HOPE	AR	LIC	50	241	269	3	118.8	0
1054215	35482	BMLED-20050405ABA	KOAR	EDUCATIONAL MEDIA FOUNDATION	A	BEEBE	AR	LIC	6	218	268	2	124.4	0
1544031	48748	BLH-20130222AAC	KEAZ	CRAIN MEDIA GROUP, LLC	C2	KENSETT	AR	LIC	50	228	264	2	141.2	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
1447213	37788	BLED-20111117AMZ	KLRE-FM	BOARD OF TRUSTEES OF THE UNIVERSITY OF A	C2	LITTLE ROCK	AR	LIC	40	170	213	53	59.6	44.6



