

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 151663

Channel 228

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.

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
181049	BLH19930125KA	KSII	116.9	116.4
181147	BLH19930127KB	KINT-FM	116.8	116.3
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				116.3

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 **116.3 dBμ**, this makes the proposed translator's worst-case interfering contour **156.3 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **0.2 m** from the transmit antenna.

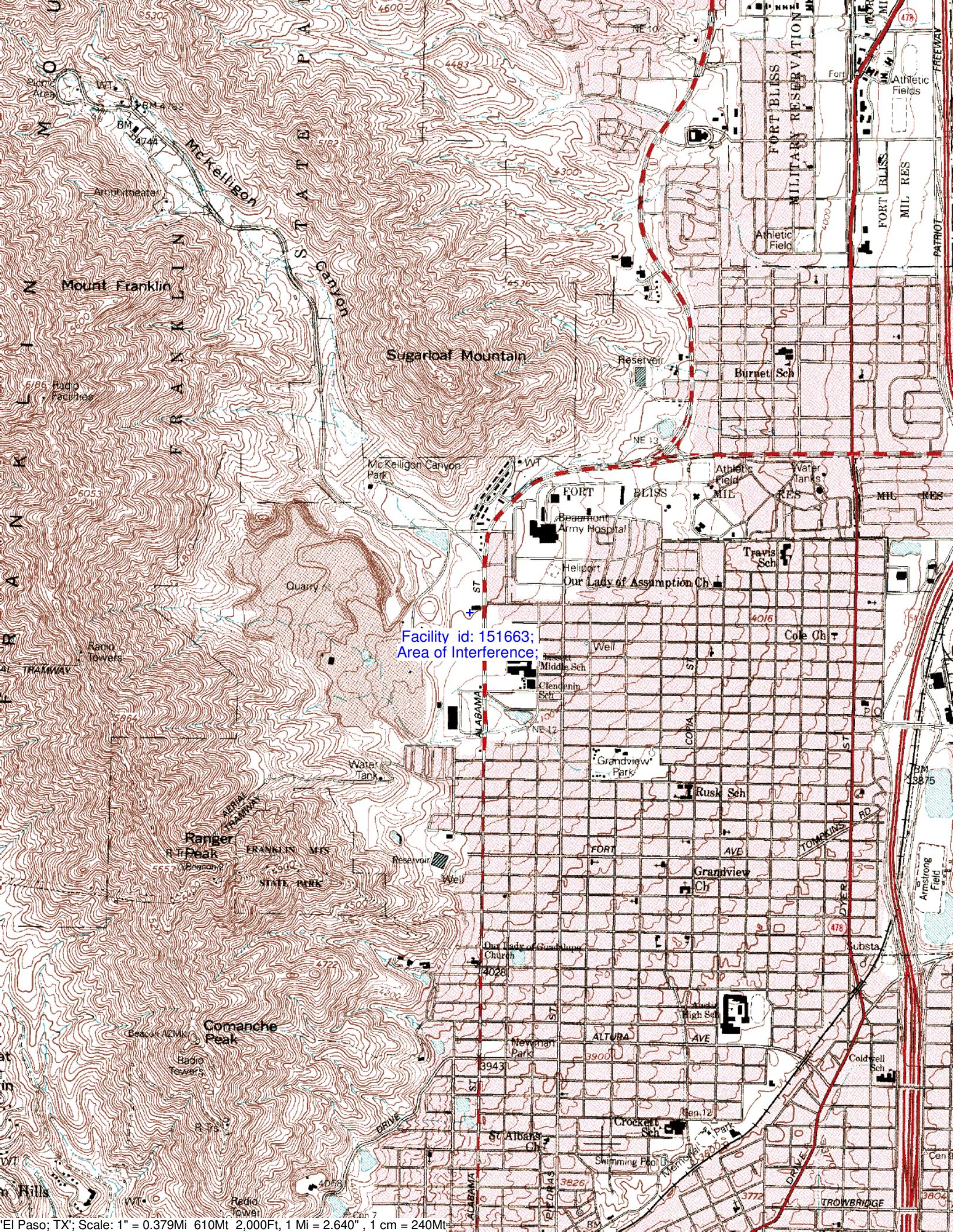
The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). However, since the area of interference extends a maximum of **0.2 m** from the transmit antenna and the transmit antenna is **38 m** above tower ground level (TGL), the area of interference will be at least **37.8 m** above TGL at the lowest point. The applicant has taken into account USGS quadrangles and relevant aerial photography in stating that no structures, except possibly tower support structures, puncture the area of interference. 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.

Antenna Manufacturer: NIC
Antenna Model: BKG77
CORAGL: 38 m
Maximum ERP: 0.004 kW
Interfering Contour: 156.3 dBμ
Max Int. Contour Distance: 0.2 m
Min Ground Clearance: 37.8 m

Adjacent Channel Study
For Station NEW, Facility_id: 151663

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
181147	51709	BLH-19930127KB	KINT-FM	ENTRAVISION HOLDINGS, LLC	C	EL PASO	TX	LIC	96	1659	230	2	2.9	0.0618
181049	36949	BLH-19930125KA	KSII	TOWNSQUARE MEDIA OF EL PASO, INC.	C	EL PASO	TX	LIC	98	1659	226	2	2.9	0.0618
630021	139209	BNPFT-20030313BEY	NEW	EDUCATIONAL MEDIA FOUNDATION	D	LAS CRUCES	NM	APP	0.023	1513	228	0	57.1	0



FACILITY id: 151663;
Area of Interference;



40 yds