

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 146194

Channel 242

### **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 roads within the 96.8m 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
255704	BLH19971020KD	KOKR	67.2	67.2
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>67.2</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 **67.2 dBμ**, this makes the proposed translator's worst-case interfering contour **107.2 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **96.8 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 buildings or roads within the 96.8m 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:** WRL  
**Antenna Model:** FMPV1  
**CORAGL:** 4 m  
**Maximum ERP:** 0.01 kW  
**Interfering Contour:** 107.2 dBμ  
**Max Int. Contour Distance:** 96.8 m

**Adjacent Channel Study  
For Station K242AZ, Facility\_id: 146194**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
255704	48743	BLH	19971020KD	KOKR	NEWPORT BROADCASTING COMPANY	C2	NEWPORT	AR	LIC	40	271	244	2	32.4	0.0597
1197540	146178	BLFT	20070730ACP	K239BC	RADIO ASSIST MINISTRY, INC.	D	BATESVILLE	AR	LIC	0.01	114	239	3	55.6	0
1225068	146181	BLFT	20070803ADX	K242BI	EAST ARKANSAS BROADCASTERS, INC.	D	BRINKLEY	AR	LIC	0.25	116	242	0	61	0
1390194	146181	BPFT	20100721DYO	K242BI	EAST ARKANSAS BROADCASTERS, INC.	D	BRINKLEY	AR	CP	0.25	115	242	0	61.3	0
263119	23849	BLH	19980304KC	KWLR	FLINN BROADCASTING CORPORATION	A	MAUMELLE	AR	LIC	4.6	222	245	3	79.5	0
63171	61363	BLH	19831117BH	KSSN	CC LICENSES, LLC	C	LITTLE ROCK	AR	LIC	92	632	239	3	91.2	0
1036372	61363	BXMLH	20050524AHV	KSSN	CC LICENSES, LLC	C	LITTLE ROCK	AR	LIC	92	415	239	3	91.3	0
221244	40746	BLH	19960307KB	KHTE-FM	CRAIN MEDIA GROUP, LLC	C3	ENGLAND	AR	LIC	10.5	229	243	1	97.6	0
694052	51923	BLH	20031017ABG	KWHF	EAST ARKANSAS BROADCASTERS OF JONESE	C2	HARRISBURG	AR	LIC	34	228	240	2	98.6	0





146194 - Proposed 107.2 dBu

Image USDA Farm Service Agency  
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35°15'57.94" N 91°40'06.34" W elev 63m

Eye alt 486 m

Imagery Date: 7/24/2009