

Non-Interference Compliance

Regarding Facility id 93062

Channel 216

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 dBμ 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
	BMLED20080410AAA			
1242648	BLED20000404ABH	KPFK	83.1	83
495926		KUSC	76.2	76.2
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				76.2

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 **76.2 dBμ**, this makes the proposed translator's worst-case interfering contour **116.2 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **34.4 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: The only structures within the zone of predicted interference are unoccupied communications buildings, so 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: SCA
Antenna Model: CL-FMVH @50°
CORAGL: 8 m
Maximum ERP: 0.01 kW
Interfering Contour: 116.2 dBμ
Max Int. Contour Distance: 34.4 m

Adjacent Channel Study **For Station K216FA, Facility_id: 93062**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1242648	51252	BMLED-20080410AA	KPFK	PACIFICA FOUNDATION, INC.	B	LOS ANGELES	CA	LIC	110	1762	214	2	37.9	0.0512
495926	69318	BLED-20000404ABH	KUSC	UNIVERSITY OF SOUTHERN CAL	B	LOS ANGELES	CA	LIC	39	1689	218	2	39.8	0.0512
1206024	164824	BLFTB-20070920AAC	KUSC-FM1	UNIVERSITY OF SOUTHERN CAL	D	SANTA CLARITA	CA	LIC	0.2	1140	218	2	42.7	0
1796832	88940	BLFT-20181130ABL	K216EM	EDUCATIONAL MEDIA FOUNDAT	D	ARCADIA	CA	LIC	0.099	579	216	0	42.7	0
74637	20873	BLFT-19841207TH	K219AO	FAMILY STATIONS, INC.	D	FAIRMONT, ETC.	CA	LIC	0.089	2453	219	3	59.7	0
1794274	92354	BLFT-20181012AAZ	K216FM	EDUCATIONAL MEDIA FOUNDAT	D	INGLEWOOD	CA	LIC	0.25	162	216	0	61.8	0
1447449	158785	BLFTB-20110929ASV	KPFK-FM1	PACIFICA FOUNDATION, INC.	D	MALIBU	CA	LIC	1.5	860	214	2	66.4	0
271776	85689	BLFT-19980731TE	K219DK	THE ASSOCIATION FOR COMMUI	D	VICTORVILLE	CA	LIC	0.01	1333	219	3	85	0
671200	69116	BMLED-20030717AB	KDSC	UNIVERSITY OF SOUTHERN CAL	B	THOUSAND OAKS	CA	LIC	4.8	879	216	0	90.2	0
1428875	91104	BMLFT-20110523AE	K214ED	CALVARY CHAPEL OF TWIN FAL	D	BENA	CA	LIC	0.01	2306	214	2	106.3	0
1079752	20902	BLED-20050815AAD	KFRB	FAMILY STATIONS, INC.	B	BAKERSFIELD	CA	LIC	2.8	1132	217	1	109.9	0
286819	88908	BLFT-19990706UB	K217DA	CENTRO CRISTIANO DE VIDA ET	D	RIDGECREST	CA	LIC	0.01	1332	217	1	113.7	0
1242280	150648	BLFT-20080404ADV	K215ET	ADVANCE MINISTRIES, INC. D/B//	D	BARSTOW	CA	LIC	0.01	1043	215	1	117.3	0
1104336	87122	BLED-20060106ABX	KWTH	CALVARY CHAPEL OF COSTA ME	B	BARSTOW	CA	LIC	1.55	1838	217	1	145.8	0



