

## **Non-Interference Compliance**

Regarding Facility id 156670

Channel 270

### **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
1327092	BLH20090820ABV	KJJJ	82.4	79.4
	BMLE20180326ABR			
1777094		KXMK	73.3	73.3
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>73.3</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 **73.3 dBμ**, this makes the proposed translator's worst-case interfering contour **113.3 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **239.9 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-FMV @ 156°  
**CORAGL:** 12 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 113.3 dBμ  
**Max Int. Contour Distance:** 239.9 m

# **Adjacent Channel Study** **For Station K269GB, Facility\_id: 156670**

## **Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1777094	183358	BMLED-20180326AB	KXMK	GOOD NEWS RADIO BROADCAST	C2	OATMAN	AZ	LIC	2.2	1352	267	3	28.9	0.3232
1327092	63410	BLH-20090820ABV	KJJJ	STEVEN M. GREELEY	C1	LAUGHLIN	NV	LIC	17	1367	272	2	28.9	0.3232
1785968	145133	BLFT-20180530AAY	K270CI	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	LIC	0.25	1167	270	0	54.2	0
174349	9036	BLFT-19920608TA	K268AC	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	LIC	0.01	2569	268	2	67.4	0
1352536	181248	BLFTB-20100108ABT	KJJJ-FM2	STEVEN M. GREELEY	D	KINGMAN	AZ	LIC	0.5	2352	272	2	68.7	0
1797135	178460	BLFTB-20181206AAf	KJJJ-FM1	STEVEN M. GREELEY	D	LAKE HAVASU CI	AZ	LIC	0.6	1437	272	2	79.6	0
1798767	30450	BLFT-20190111AAH	K270AD	DONALD F. HENDREN	D	LAKE HAVASU CI	AZ	LIC	0.099	1438	270	0	79.6	0
1798617	178460	BPFTB-20190107AAf	KJJJ-FM1	STEVEN M. GREELEY	D	LAKE HAVASU CI	AZ	CP	0.6	1384	272	2	79.8	0
1487019	55503	BLH-20120214ACK	KWID	LOTUS BROADCASTING CORP.	C0	LAS VEGAS	NV	LIC	47	1370	270	0	93.8	0
1747351	156491	BLFT-20161219ACO	K267CK	AIRCRAFT STORAGE SOLUTION	D	KINGMAN	AZ	LIC	0.09	642	267	3	102.6	0
1807234	198736	BLH-20190709AAM	KXBB	RIVER RAT RADIO, LLC	B1	CIENEGA SPRING	AZ	LIC	1.65	537	269	1	104.5	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
1409916	88719	BLED-20101104ACC	KVKL	SOUTHERN NEVADA EDUCATIO	C1	LAS VEGAS	NV	LIC	41	1477	216	54	77.1	55.1
114473	67647	BLFT-19880623TA	K217BE	ADVANCED MINISTRIES, INC. D/E	D	KINGMAN	AZ	LIC	0.165	2352	217	53	67	57
1035032	48504	BLED-20041214AES	KNLB	NEW LIFE CHRISTIAN SCHOOL	C3	LAKE HAVASU CI	AZ	LIC	8	650	216	54	84.9	72.9





