

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 144145

Channel 210

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 V-Soft FM Commander using 3 sec SRTM terrain data.

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
1106416	BLED20060103AFV	KFNO	78.3	78.3
48839	BLED19821108AH	KVPR	78.6	78.4
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				78.3

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 **78.3 dBμ**, this makes the proposed translator's worst-case interfering contour **118.3 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **106.9 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"). 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.

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: CA2-CP @ 221°
CORAGL: 6 m
Maximum ERP: 0.157 kW
Interfering Contour: 118.3 dBμ
Max Int. Contour Distance: 106.9 m

Adjacent Channel Study
 Advance Ministries, Inc. D/b/a New Life
 Average Protected F(50-50)= 20.23 km
 Standard Directional

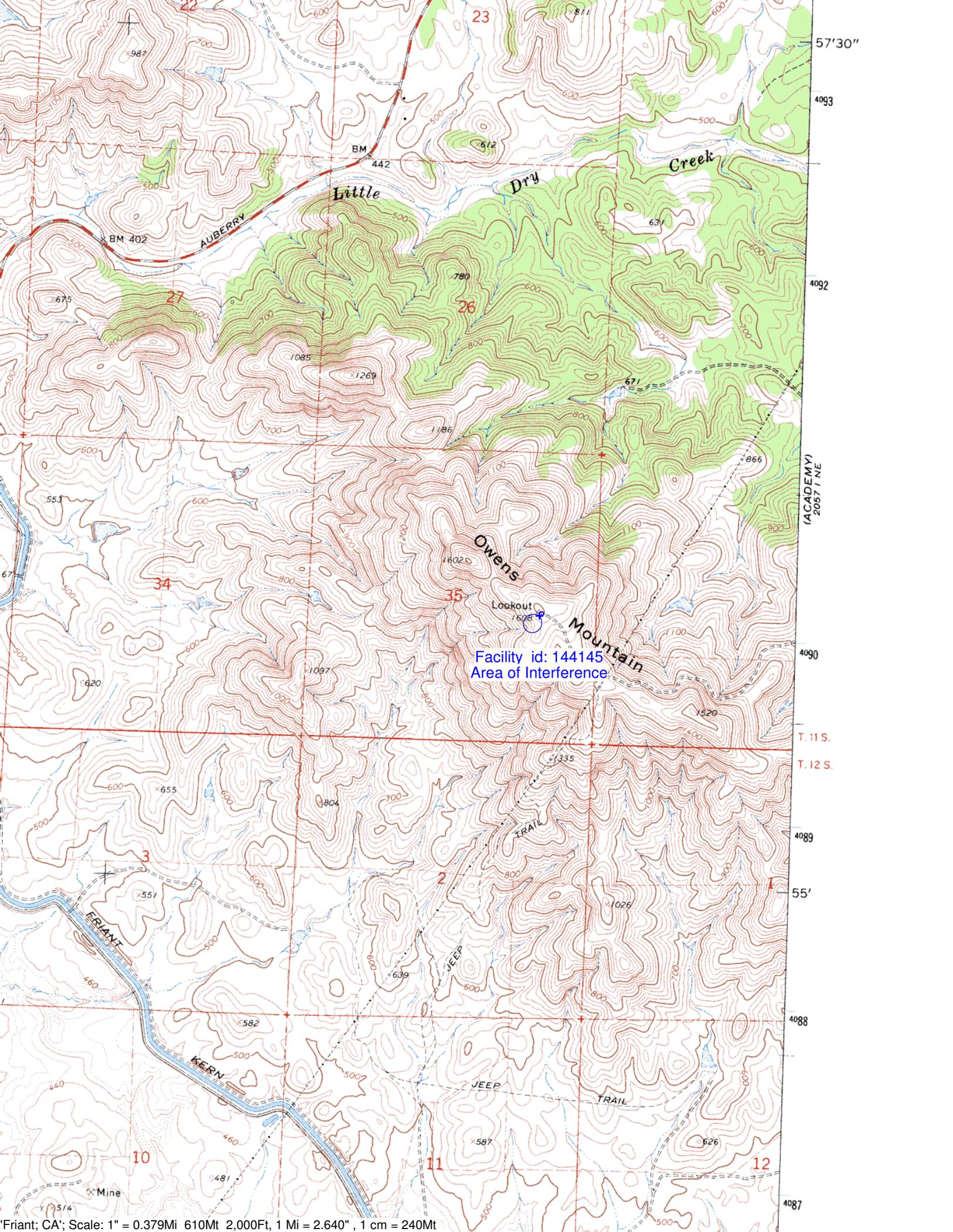
REFERENCE
 36 55 47.50 N.
 119 38 29.61 W.

CH# 210D - 89.9 MHz, Pwr= 0.157 kW DA, HAAT= 301.8 M, COR= 493 M

DISPLAY DATES
 DATA 05-04-21
 SEARCH 05-04-21

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
210B Le Grand	KEFR	LIC _CN CA		332.9 152.7	75.47 BLED19910610KB	37 32 00.80 120 01 53.60	1.800 653	132.2 1330	54.8 Family Stations, Inc.	-64.4*	1.0
207B Fresno	KVPR	LIC _CN CA		49.3 229.4	24.52 BLED19821108AH	37 04 24.80 119 25 55.40	2.450 576	3.3 1398	64.0 White Ash Broadcasting, In	12.6	-39.7*
212B Fresno	KFNO	LIC DCN CA		49.3 229.4	24.51 BLED20060103AFV	37 04 24.80 119 25 55.50	2.200 594	2.6 1424	59.4 Family Stations, Inc.	13.3	-35.1*
210B Kettleman City	KZKC	LIC DVN CA		195.8 15.6	107.99 BLED20061017AAC	35 59 41.80 119 58 09.50	50.000 77	110.0 205	40.9 Intermountain Public Radio	-23.4*	0.9
210B Kettleman City	KZKC	CP DCN CA		202.6 22.3	108.31 BPED20180302AAQ	36 01 46.20 120 06 15.60	8.100 181	102.5 406	40.5 Intermountain Public Radio	-15.6	0.0
06 -- Visalia	KMCF-LD	CP DHN CA		122.6 302.8	37.82 0000106842	36 44 45.20 119 17 02.39	3.000	0.6 1049	45.1	45.7R	-7.9M
209B1 Visalia	KARM	LIC _CN CA		117.5 297.9	70.24 BLED19900618KD	36 38 09.80 118 56 35.30	1.000 247	68.1 1574	43.7 Harvest Broadcasting Compa	-6.3	12.8
213B Woodlake	KLXY	LIC _CN CA		134.7 315.2	101.31 BLED19830524AA	36 17 08.80 118 50 18.30	0.850 761	2.0 1715	54.5 Educational Media Foundati	86.4	46.7
213B Woodlake	KLXY	CP _CN CA		134.7 315.2	101.08 0000116559	36 17 15.70 118 50 23.30	0.700 807	1.8 1765	53.9 Educational Media Foundati	86.3	47.1
06 -- Ceres	K06QL-D	CP DCN CA		321.3 140.8	123.40 0000022114	37 47 34.00 120 31 11.99	3.000	0.6 417	13.5	14.1R	109.3M

Terrain database is SRTM 03 SEC , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
 In & Out distances between contours are shown at closest points. Reference zone= East Zone 2A, Co to 3rd adjacent.
 All separation margins (if shown) include rounding.
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
 "*"affixed to 'IN' or 'OUT' values = site inside restricted contour.



57'30"

4093

4092

(ACADEMY)
2057 1 NE

4090

T. 11 S.

T. 12 S.

4089

55'

4088

4087

