

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 201620

Channel 252

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 dB μ 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
208701	BLH19950502KA	KLUK	71.6	71.6
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			71.6

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 **71.6 dB μ** , this makes the proposed translator's worst-case interfering contour **111.6 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **291.7 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 structure within the zone of predicted interference is an unoccupied communications building, 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-FM @ 314°
CORAGL: 19 m
Maximum ERP: 0.25 kW
Interfering Contour: 111.6 dB μ
Max Int. Contour Distance: 291.7 m

Adjacent Channel Study For Station K252FW, Facility_id: 201620

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
208701	8385	BLH-19950502KA	KLUK	CAMERON BROADCASTING, INC.	C1	NEEDLES	CA	LIC	29.5	1260	250	2	44.8	0.2275
1734192	156326	BLFT-20160725AAC	K252FF	AIRCRAFT STORAGE SOLUTIONS	D	LAKE HAVASU CITY	AZ	LIC	0.25	1427	252	0	68.3	0
1754887	156420	BPFT-20170410ADN	K254CE	AIRCRAFT STORAGE SOLUTIONS	D	LAKE HAVASU CITY	AZ	CP	0.05	1379	254	2	68.5	0
1118837	34556	BLH-20060320ADE	KHWY	HEFTEL BROADCASTING COMPANY	B	ESSEX	CA	LIC	9	1136	255	3	110.8	0
1523285	48502	BLFT-20121106AAR	K251BS	CALVARY CHAPEL OF COSTA MESA	D	NORTH LAS VEGAS	NV	LIC	0.18	1349	251	1	140	0
97707	47744	BLH-19870211KA	KLUC-FM	ENTERCOM LICENSE, LLC	C	LAS VEGAS	NV	LIC	97	1050	253	1	142.2	0
1765352	38447	BLFT-20170828ADK	K255CT	LOTUS BROADCASTING CORP.	D	HENDERSON	NV	LIC	0.099	913	255	3	162.6	0
1145689	41462	BLH-20060831AAC	KKFR	RIVIERA BROADCASTING, LLC	C	MAYER	AZ	LIC	41	2385	252	0	169.7	0
1393577	78999	BLH-20100727AFE	KRQX-FM	REDROCK BROADCASTING, INC.	C1	HURRICANE	UT	LIC	14.5	1985	255	3	196.2	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
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HUALAPAI PEAK QUADRANGLE
ARIZONA-MOHAVE CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

32254 M NE
(HUALAPAI SPRING)



