

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 201616

Channel 227

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
1638576	BLH20140521AEF	KVYL	67.8	67.8
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			67.8

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 **67.8 dB μ** , this makes the proposed translator's worst-case interfering contour **107.8 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **451.8 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: 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: BEX
Antenna Model: LOG-R @ 156°
CORAGL: 6 m
Maximum ERP: 0.25 kW
Interfering Contour: 107.8 dB μ
Max Int. Contour Distance: 451.8 m

Adjacent Channel Study For Station K226CS, Facility_id: 201616

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1638576	164262	BLH-20140521AEF	KVYL	BIG RIVER BROADCASTING LLC	C3	MOHAVE VALLEY	AZ	LIC	0.62	1350	229	2	28.8	0.2275
1645280	967	BLFT-20140728AAM	K224BV	ADVANCE MINISTRIES, INC. D/B//	D	KINGMAN	AZ	LIC	0.25	2356	224	3	67	0
1679051	152138	BLFT-20150527AAB	K227CS	STEVEN M. GREELEY	D	KINGMAN	AZ	LIC	0.01	2353	227	0	67	0
1807368	6893	BLH-20190722AAS	KYMT	CITICASTERS LICENSES, INC.	C	LAS VEGAS	NV	LIC	23.5	2632	226	1	118.2	0
620386	88674	BLH-20021210ABV	KRIT	FARMWORKER EDUCATIONAL R	C3	PARKER	AZ	LIC	7.6	149	230	3	118.3	0
205225	6893	BLH-19941228KD	KYMT	CITICASTERS LICENSES, INC.	C	LAS VEGAS	NV	LIC	24	2606	226	1	118.4	0
1746805	156843	BLFT-20161212AAH	K224FH	AIRCRAFT STORAGE SOLUTION:	D	PARKER	AZ	LIC	0.01	134	224	3	119.3	0
1746183	156820	BLFT-20161205AAC	K228FF	AIRCRAFT STORAGE SOLUTION:	D	PARKER	AZ	LIC	0.001	134	228	1	119.3	0
1761083	156843	BPFT-20170714AKZ	K224FH	AIRCRAFT STORAGE SOLUTION:	D	PARKER	AZ	CP	0.0155	510	224	3	122.4	0
1761098	156820	BPFT-20170717AAI	K228FF	AIRCRAFT STORAGE SOLUTION:	D	PARKER	AZ	CP	0.25	510	228	1	122.4	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
1746402	142491	BLFT-20170109ABG	K281CR	RUBIN BROADCASTING, INC.	D	NEEDLES	CA	LIC	0.25	419	281	54	12.7	2.7
1644209	67363	BLFT-20140716AEV	K280DL	TOWER COMMUNICATIONS	D	LAKE HAVASU CI	AZ	LIC	0.25	1436	280	53	79.6	69.6



