

## **Non-Interference Compliance**

Regarding Facility id 92163

Channel 212

### **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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
70968	BLED19840711DA	KOSC	75.6	75.6
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>75.6</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 **75.6 dBμ**, this makes the proposed translator's worst-case interfering contour **115.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **36.8 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: There are no occupied buildings or roads within the zone of predicted interference 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.

<b>Antenna Manufacturer:</b>	<b>BEX</b>
<b>Antenna Model:</b>	<b>TFC2K-2</b>
<b>CORAGL:</b>	<b>15 m</b>
<b>Maximum ERP:</b>	<b>0.01 kW</b>
<b>Interfering Contour:</b>	<b>115.6 dBμ</b>
<b>Max Int. Contour Distance:</b>	<b>36.8 m</b>

# Adjacent Channel Study For Station K212DJ, Facility\_id: 92163

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
70968	27946	BLED-19840711DA	KOSC	UNIVERSITY OF SOUTHERN CAL	B	ANGWIN	CA	LIC	0.8	1341	210	2	18	0.2376
405366	89938	BLFT-19990817AAA	K215CQ	RURAL CALIFORNIA BROADCAST	D	SANTA ROSA	CA	LIC	0.016	67	215	3	40.5	0
545950	83668	BLFT-20001221ACC	K214CS	SAN MATEO COUNTY COMMUNIT	D	SONOMA	CA	LIC	0.004	768	214	2	53	0
134767	41157	BLED-19891024KD	KZYX	MENDOCINO COUNTY PUBLIC BI	B	PHILO	CA	LIC	3.4	849	214	2	71.7	0
1172469	89129	BLED-20061226AAC	KWMR	KWMR INC	A	POINT REYES ST.	CA	LIC	0.235	405	213	1	81.6	0
1810178	89129	BPED-20190912AAF	KWMR	KWMR INC	A	POINT REYES ST.	CA	APP	0.32	405	213	1	81.6	0
233243	20776	BLFT-19960930TH	K213BZ	FAMILY STATIONS, INC.	D	RICHVALE	CA	LIC	0.01	645	213	1	91	0
1296951	93568	BLFT-20090219ABD	K210EH	KWMR INC	D	BOLINAS	CA	LIC	0.01	227	210	2	97.5	0
601630	11903	BLED-20020430AAA	KVHS	CLAYTON VALLEY HIGH SCHOOL	A	CONCORD	CA	LIC	0.41	209	213	1	107.7	0
1452374	69143	BLED-20120109ABQ	KDFC	UNIVERSITY OF SOUTHERN CAL	B1	SAN FRANCISCO	CA	LIC	1	353	212	0	108.4	0
73866	8336	BLED-19841106KS	KXJZ	CALIFORNIA STATE UNIVERSITY	B	SACRAMENTO	CA	LIC	50	155	215	3	109.6	0
1267066	87930	BLED-20080922ACJ	KJCU	CALVARY CHAPEL OF TWIN FAL	A	FORT BRAGG	CA	LIC	0.13	228	210	2	111.1	0
44828	68999	BLED-19820712AL	KALX	REGENTS OF THE UNIVERSITY C	A	BERKELEY	CA	LIC	0.5	350	214	2	111.9	0
1276898	89079	BLED-20081103AAE	KLRS	EDUCATIONAL MEDIA FOUNDAT	B	LODI	CA	LIC	2.5	489	209	3	122.8	0
262638	63459	BLFT-19980219TD	K211DF	YOUR CHRISTIAN COMPANION N	D	FOOTHILL FARMS	CA	LIC	0.245	92	211	1	123.1	0
150241	24541	BLED-19900713KD	KZFR	GOLDEN VALLEY COMMUNITY BI	B1	CHICO	CA	LIC	6.3	731	211	1	146.7	0



