

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 153879

Channel 262

### **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 $\mu$  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 $\mu$  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>
1422415	BLH20110330ACH	KSNA	62.5	62.5
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>62.5</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 **62.5 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **102.5 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **526 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.

**Antenna Manufacturer:** SCA  
**Antenna Model:** CL-FM  
**CORAGL:** 103 m  
**Maximum ERP:** 0.1 kW  
**Interfering Contour:** 102.5 dB $\mu$   
**Max Int. Contour Distance:** 526 m

## Adjacent Channel Study For Station K262CL, Facility\_id: 153879

### Co-channel through third adjacent:

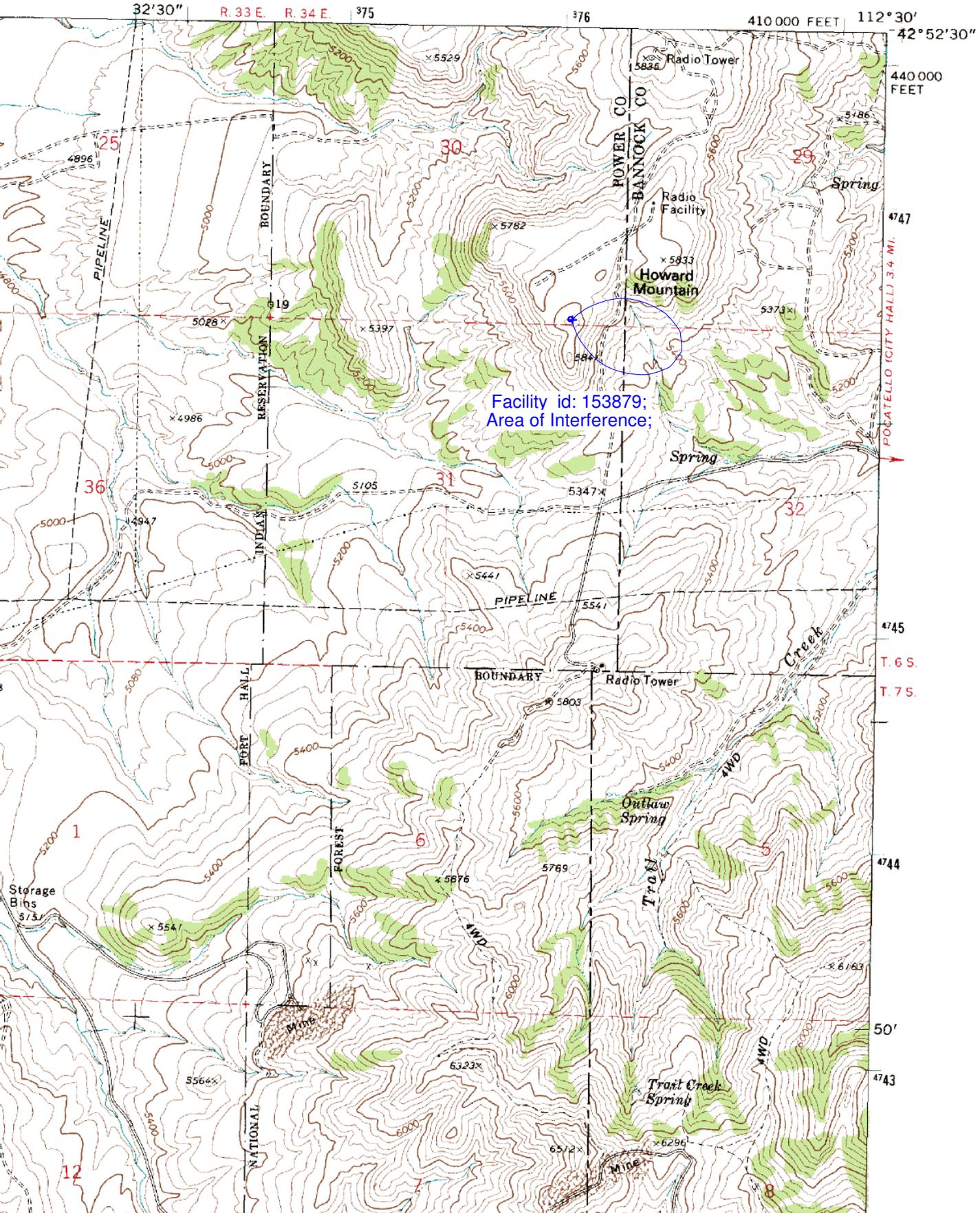
App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
1457580	178841	BLFTB-20111109AVE	KSNA-FM1	SANDHILL MEDIA GROUP, LLC	D	POCATELLO	ID	LIC	2.2	1443	264	2	6	0.2354
1422415	55237	BLH-20110330ACH	KSNA	SANDHILL MEDIA GROUP, LLC	C1	IDAHO FALLS	ID	LIC	100	1789	264	2	68.3	0.2354
1579745	145799	BNPFT-20131022ALZ	K260CF	TAUNA M. BARBIERI	D	POCATELLO	ID	CP	0.013	1783	260	2	1.3	0
1568461	142206	BNPFT-20130814ACH	K262CH	RIVERBEND COMMUNICATIONS, LLC	D	POCATELLO	ID	CP	0.075	1379	262	0	11.2	0
37557	17436	BLH-19811229AK	KITT	JACKSON HOLE MEDIA LLC	A	SODA SPRINGS	ID	LIC	3	1831	261	1	78	0
1006848	42885	BLH-20040817AAG	KZDX	LEE FAMILY BROADCASTING, INC.	C	BURLEY	ID	LIC	27	2536	260	2	106.6	0
200971	4406	BLFT-19940714TJ	K260AD	BEAR LAKE COUNTY T.V. DISTRICT	D	MONTPELIER	ID	LIC	0.01	2178	260	2	106.6	0
200969	4395	BLFT-19940714TH	K264AD	BEAR LAKE COUNTY T.V. DISTRICT	D	MONTPELIER	ID	LIC	0.01	2178	264	2	106.6	0
1649650	157245	BPFT-20140909AEJ	K262CA	SUN VALLEY RADIO, INC.	D	RICHMOND	UT	CP	0.25	1727	265	3	124.6	0
1634479	88184	BMPH-20140508AAF	KLZX	SUN VALLEY RADIO INC	C2	WESTON	ID	CP MOD	50	1746	260	2	124.6	0
1657717	190386	BLH-20141113AAAY	KUPY	FRANSEN MEDIA COMPANY, LLC	C3	SUGAR CITY	ID	LIC	0.77	2619	260	2	134.3	0
1627696	17436	BPH-20140304ACL	KITT	JACKSON HOLE MEDIA LLC	C2	WILSON	WY	CP	7.8	2489	262	0	157.9	0

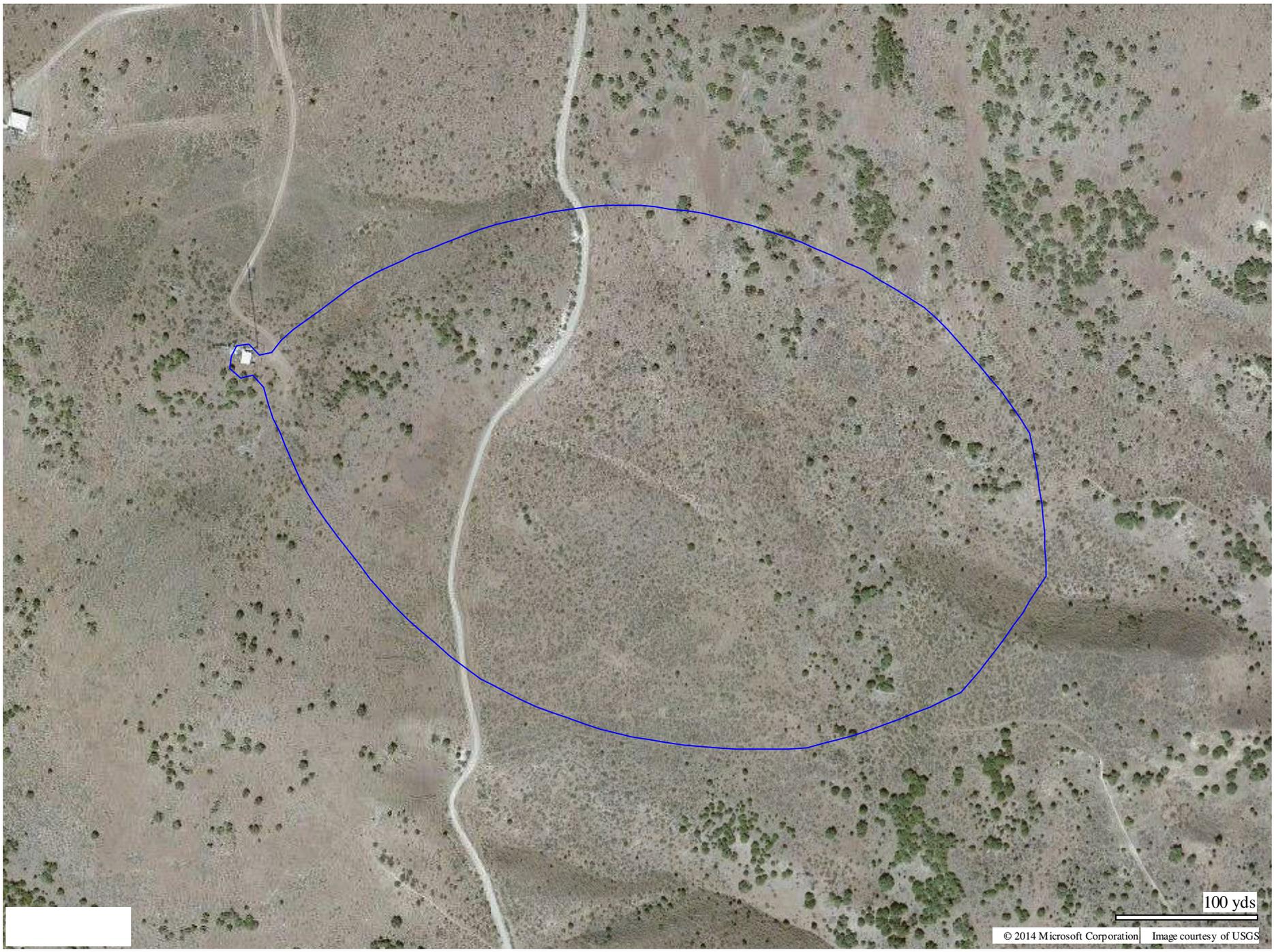
### Intermediate Frequencies (53 and 54 channels difference):

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
1077212	91942	BLED-20050729DTE	KLRI	EDUCATIONAL MEDIA FOUNDATION	C0	RIGBY	ID	LIC	78	2033	208	54	71.9	46.9

MICHAUD CREEK QUADRANGLE  
IDAHO  
7.5 MINUTE SERIES (TOPOGRAPHIC)

3569 IV NW  
(POCATELLO NORTH)





100 yds