

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 141866

Channel 222

### **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.

**Note: The only structures within the zone of predicted interference are unoccupied communications buildings so 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.**

## 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>
1559558	BPH20130531AKY	KRIT	68.4	68.4
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>68.4</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 **68.4 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **108.4 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **421.7 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

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**Antenna Manufacturer:** SCA  
**Antenna Model:** CL-FM Composite @ 345°  
**CORAGL:** 40 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 108.4 dB $\mu$   
**Max Int. Contour Distance:** 421.7 m

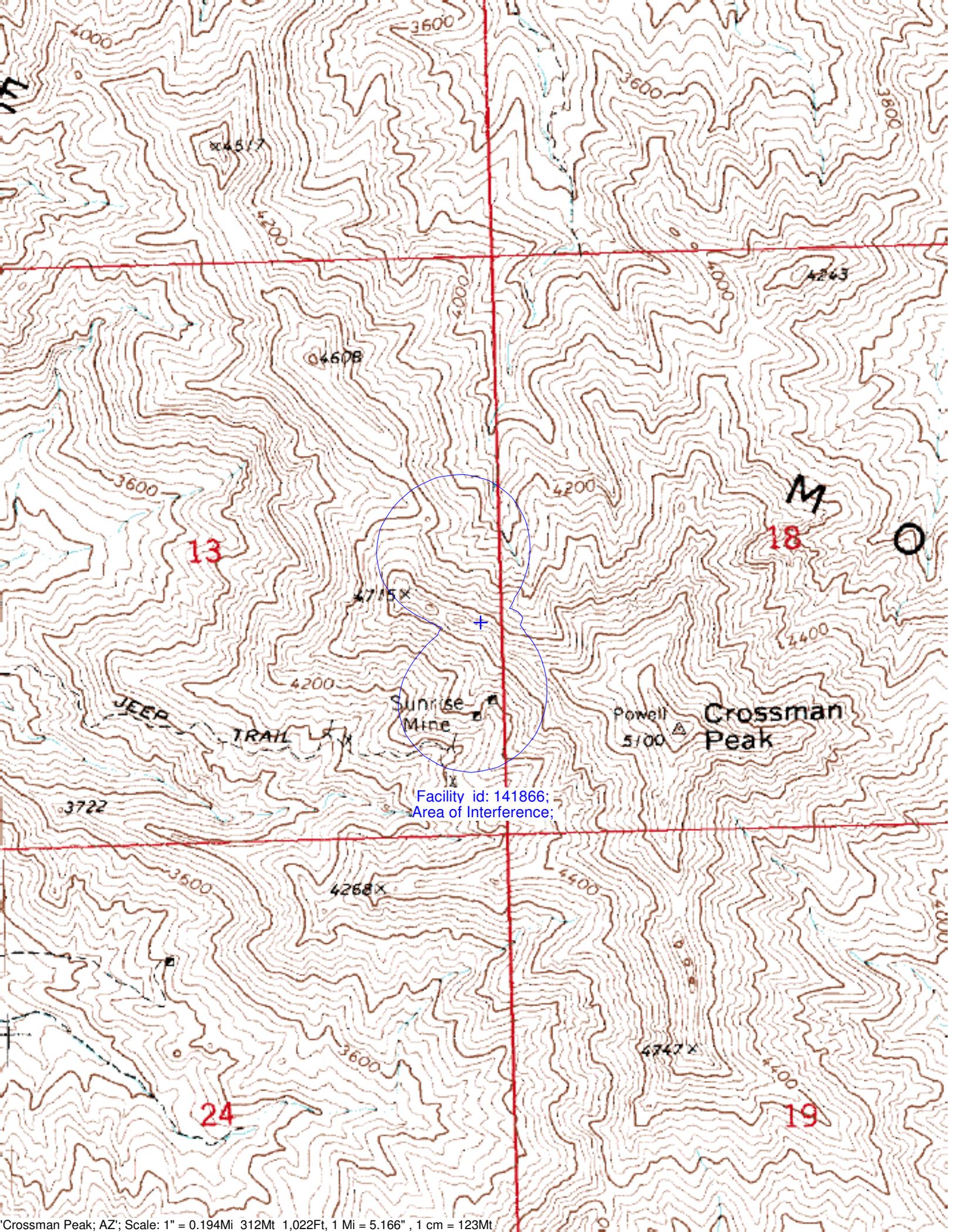
## Adjacent Channel Study For Station K222AV, Facility\_id: 141866

### Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
1559558	88674	BPH-20130531AKY	KRIT	FARMWORKER EDUCATIONAL RADIO NETWORK, IN	B1	PARKER	AZ	CP	6.1	527.8	224	2	26.9	1.4626
1414295	48355	BLFT-20110114ABN	K219LM	NEVADA PUBLIC RADIO	D	LAKE HAVASU CIT	AZ	LIC	0.09	151	219	3	17.6	0
110156	967	BLFT-19880309TF	K224BV	ADVANCE MINISTRIES, INC. D/B/A NEW LIFE	D	KINGMAN	AZ	LIC	0.082	2386	224	2	67.6	0
1400429	90917	BLED-20100125ADU	KLKI	EDUCATIONAL MEDIA FOUNDATION	C0	DOLAN SPRINGS	AZ	LIC	30	1492	220	2	92.3	0
1546282	142604	BNPFT-20130319AAB	NEW	MARY V. GUTHRIE	D	BLYTHE	CA	APP	0.01	251	223	1	94.1	0
634554	142604	BNPFT-20030317ARN	NEW	MARY V. GUTHRIE	D	BLYTHE	CA	APP	0.05	247	223	1	94.1	0
632644	141118	BNPFT-20030312AQD	NEW	ADVANCE MINISTRIES, INC. D/B/A NEW LIFE	D	QUARTZSITE	AZ	APP	0.01	289	224	2	96.1	0
1489592	171234	BLED-20120228ABV	KEQS	E. Q. SCHOLARS, INC.	A	QUARTZSITE	AZ	LIC	0.1	283	219	3	97.8	0
1547654	141118	BNPFT-20130325ACD	NEW	ADVANCE MINISTRIES, INC. D/B/A NEW LIFE	D	QUARTZSITE	AZ	APP	0.01	1011	225	3	110.1	0
1551679	141164	BNPFT-20030312APR	NEW	ADVANCE MINISTRIES, INC. D/B/A NEW LIFE	D	WICKENBURG	AZ	APP	0.25	680	224	2	147.8	0
1551723	143311	BNPFT-20030317ATD	NEW	POWELL MEREDITH COMMUNICATIONS COMPANY	D	WICKENBURG	AZ	APP	0.2	638	224	2	148.8	0
1382088	171022	BLH-20100706IZD	KFLX	GRENAX BROADCASTING II, LLC	A	CHINO VALLEY	AZ	LIC	1.5	1696	223	1	153.7	0
495849	73760	BLED-20000403ABC	KYRM	WORLD RADIO NETWORK, INC.	B	YUMA	AZ	LIC	6.3	690	220	2	176.4	0
232131	38451	BLH-19960913KB	KOMP	LOTUS BROADCASTING CORP.	C	LAS VEGAS	NV	LIC	25	2583	222	0	197	0
1243459	171488	BLFTB-20080327ADQ	KRRN-FM2	ENTRAVISION HOLDINGS, LLC	D	LAS VEGAS	NV	LIC	20	1079	224	2	224.6	0
1239520	27982	BLH-20080327ADP	KRRN	ENTRAVISION HOLDINGS, LLC	C	MOAPA VALLEY	NV	LIC	100	1173	224	2	230.6	0
1014948	65479	BLH-20040707ABM	KTAR-FM	BONNEVILLE INTERNATIONAL CORPORATION	C	GLENDALE	AZ	LIC	98	911	222	0	238.7	0

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

App\_id



Facility id: 141866;  
Area of Interference;

