

Non-Interference Compliance

Regarding Facility id 41608

Channel 280

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.

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 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1492846	BMLH20120321AES	KAJM	81.9	81.9
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				81.9

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 **81.9 dBμ**, this makes the proposed translator's worst-case interfering contour **121.9 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **89.1 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 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.

Antenna Manufacturer: SCA
Antenna Model: CL-FM @ 40°
CORAGL: 8 m
Maximum ERP: 0.25 kW
Interfering Contour: 121.9 dBμ
Max Int. Contour Distance: 89.1 m

Adjacent Channel Study **For Station K265CI, Facility_id: 41608**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1492846	52818	BMLH-20120321AES	KAJM	SIERRA H BROADCASTING, INC.	C	CAMP VERDE	AZ	LIC	40	2323	282	2	33.5	0.2275
1174502	138607	BLFT-20070402KSG	K277AR	ARIZONA BOARD OF REGENTS F	D	COTTONWOOD	AZ	LIC	0.01	2367	277	3	44	0
1547640	156446	BNPFT-20130326AG	K280FS	DONALD F. HENDREN	D	NOTHING	AZ	CP	0.25	1010	280	0	73.5	0
1464422	56339	BLH-20111116ANB	KZKE	ROUTE 66 BROADCASTING, LLC	C3	SELIGMAN	AZ	LIC	7.7	1881	277	3	95.1	0
265549	48738	BMLH-19980406KB	KLNZ	ENTRAVISION HOLDINGS, LLC	C	GLENDALE	AZ	LIC	48	1269	278	2	100	0
1682662	144556	BPFT-20150709ABB	K277BX	FARRELL ENTERPRISES LLC	D	STAR VALLEY	AZ	CP	0.25	1614	277	3	115.2	0
1198658	165966	BLH-20070806AAV	KZGL	MURPHY AIR, LLC	C3	FLAGSTAFF	AZ	LIC	0.56	2831	279	1	119.3	0
1394467	64686	BLFT-20100805AKX	K281BE	PRESCOTT SOUND INVESTMEN	D	FLAGSTAFF	AZ	LIC	0.018	2835	281	1	119.5	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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WILHOIT QUADRANGLE
ARIZONA-YAVAPAI
7.5 MINUTE SERIES (TOPO)



