

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 9035

Channel 264

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 a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by Google Earth. The proposed transmit site and the zone of interference have been identified on the map. It has been included to provide clarification of the nature of the buildings in the vicinity.

Note: The quadrangle and aerial photo indicate the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision. The zone of predicted interference extends 145.8 from the proposed transmit site. The buildings within the zone of predicted interference are non-occupied 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 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
594551	BMLH20020213AAY	KGMN	97.3	96.9
621338	BLH20021101AAC	KRRK	66.2	66.2
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				66.2

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 **66.2 dB μ** , this makes the proposed translator's worst-case interfering contour **106.2 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **145.8 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").

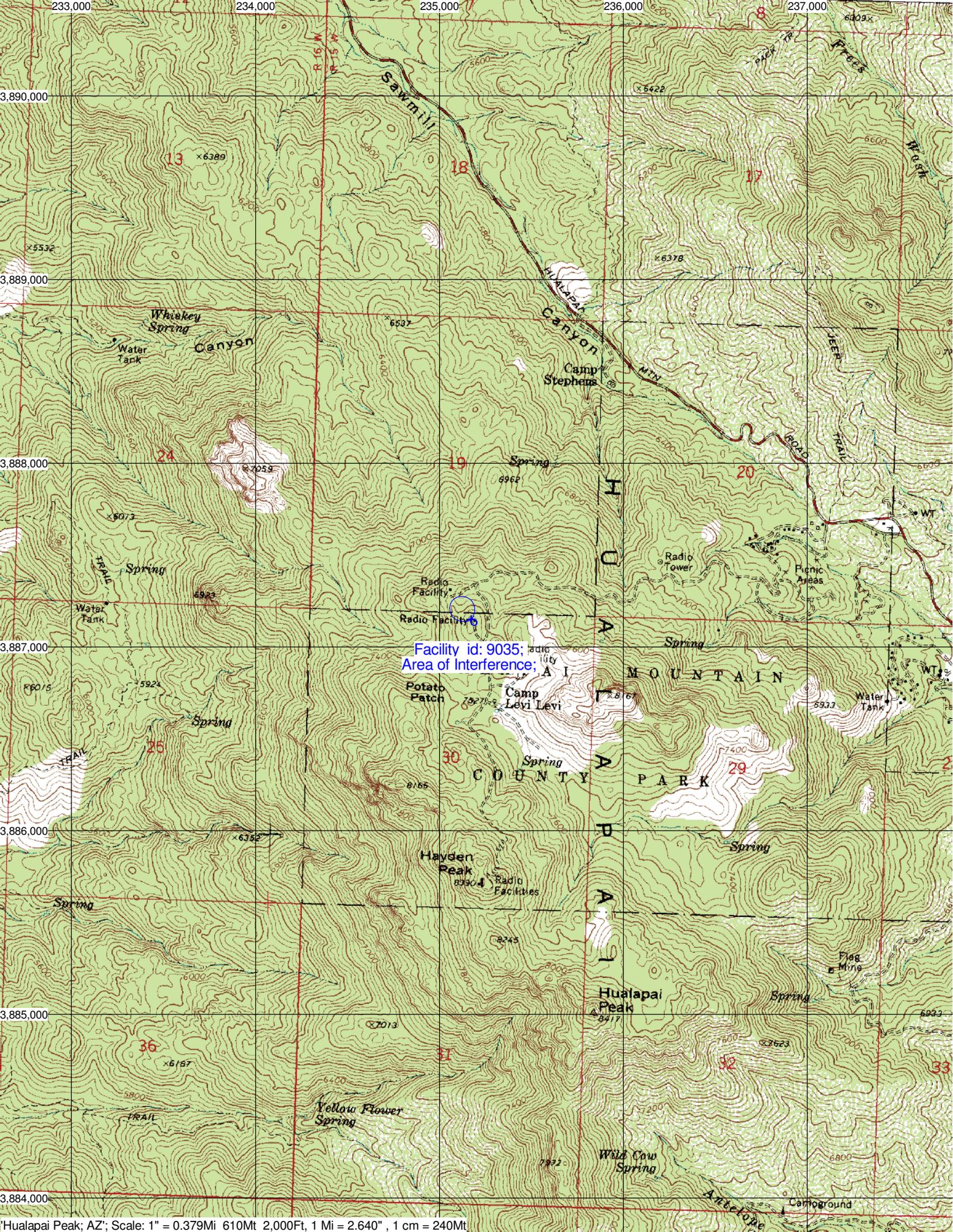
Note: The quadrangle and aerial photo indicate the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision. The zone of predicted interference extends 145.8 from the proposed transmit site. The buildings within the zone of predicted interference are non-occupied 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: CA2-CP
CORAGL: 8 m
Maximum ERP: 0.018 kW
Interfering Contour: 106.2 dB μ
Max Int. Contour Distance: 145.8 m

Adjacent Channel Study
For Station K264AB, Facility_id: 9035

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
594551	48680	BMLH	20020213AAY	KGMM	NEW WEST BROADCASTING SYSTEMS, INC.	C2	KINGMAN	AZ	LIC	0.91	2340	261	3	2.8	0.0234
1347131	183358	BNPH	20091016ADO	NEW	COCHISE MEDIA LICENSES, LLC	C2	OATMAN	AZ	APP	2.5	1352	267	3	42.5	0.0234
621338	38314	BLH	20021101AAC	KRRK	SMOKE AND MIRRORS, LLC	C0	LAKE HAVASU CITY	AZ	LIC	20	1461	266	2	65.8	0.0234
1065247	162222	BLFTB	20050601CEU	KGMM-FM1	NEW WEST BROADCASTING SYSTEM, INC.	D	BULLHEAD CITY	AZ	LIC	0.003	1213	261	3	42.8	0
639143	146554	BNPFT	20030317IJ	NEW	ADVANCE MINISTRIES, INC. D/B/A NEW LIFE CH	D	RIVIERA	AZ	APP	0.13	244	262	2	62.4	0
649984	156692	BNPFT	20030317JOA	NEW	DONALD F. HENDREN	D	MOHAVE VALLEY	AZ	APP	0.25	370	262	2	63.1	0
624585	40555	BLFT	20030128ADA	K263AI	DONALD F. HENDREN	D	LAKE HAVASU CITY	AZ	LIC	0.034	1437	263	1	65.8	0
1180355	38314	BPH	20070330BLP	KRRK	SMOKE AND MIRRORS, LLC	C3	DESERT HILLS	AZ	CP	0.275	1461	264	0	65.8	0
634388	142491	BNPFT	20030317ARL	NEW	POWELL MEREDITH COMMUNICATIONS COMP,	D	NEEDLES	CA	APP	0.038	223	262	2	70.2	0
621455	30451	BLFT	20021224ACJ	K264AK	SMOKE AND MIRRORS, LLC	D	LAUGHLIN	NV	LIC	0.01	1467	264	0	78	0
643806	150747	BNPFT	20030317GUC	NEW	DONALD F. HENDREN	D	CHINO STATION	AZ	APP	0.25	1720	261	3	82.7	0
189676	14878	BLFT	19930907TF	K262AA	PHELPS DODGE BAGDAD, INC.	D	BAGDAD	AZ	LIC	0.046	1215	262	2	88.1	0
632223	140806	BNPFT	20030312ARJ	NEW	ADVANCE MINISTRIES, INC. D/B/A NEW LIFE CH	D	BOULDER CITY	NV	APP	0.01	1081	266	2	132.6	0
1174509	12560	BSTA	20070227ACO	KXNT-FM	CBS RADIO STATIONS INC.	C	HENDERSON	NV	APP	5.6	1255	263	1	139.5	0
650618	157271	BNPFT	20030317LLU	NEW	BROADCAST TOWERS, INC.	D	SOUTH LAS VEGAS	NV	APP	0.01	1121	265	1	142.3	0
1180954	12560	BMLH	20070406ABM	KXNT-FM	CBS RADIO STATIONS INC.	C	HENDERSON	NV	LIC	100	1047	263	1	142.3	0
630571	139593	BNPFT	20030313AXG	NEW	EDUCATIONAL MEDIA FOUNDATION	D	HENDERSON	SC	APP	0.01	1110	265	1	142.3	0
631791	140461	BNPFT	20030310BIT	NEW	CALVARY CHAPEL OF TWIN FALLS, INC.	D	MOAPA	NV	APP	0.01	1243	265	1	155.8	0



Facility id: 9035;
Area of Interference;



9035 - Proposed 106.2 dBu

Imagery Date: Nov 9, 2002

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35°05'40.51" N 113°54'22.56" W elev 2318 m

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Eye alt 2.68 km