

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 54323

Channel 245

### **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: There are no occupied buildings or major roads within the zone of predicted interference 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1133972	BLFT20060321AEI	K242AS	93.8	93.6
1550731	BPFT20130415AAB	K242AS	138.5	138.5
1618918	BLFT20140107ARL	K248BJ	101.8	101.8
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>93.6</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 **93.6 dBμ**, this makes the proposed translator's worst-case interfering contour **133.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **23.2 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.

**Note: There are no occupied buildings or major roads within the zone of predicted interference 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 (V &H) @ 160°  
**CORAGL:** 53 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 133.6 dBμ  
**Max Int. Contour Distance:** 23.2 m

## Adjacent Channel Study For Station K245AW, Facility\_id: 54323

### Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1550731	30447	BPFT-20130415AAB	K242AS	STEVEN M. GREELEY	D	BULLHEAD CITY,	AZ	CP	0.01	1531	242	3	0	0.2275
1618918	147059	BLFT-20140107ARL	K248BJ	ADVANCE MINISTRIES, INC. D/B//	D	MOHAVE VALLEY	AZ	LIC	0.25	1466	248	3	0.9	0.2275
1133972	30447	BLFT-20060321AEI	K242AS	STEVEN M. GREELEY	D	BULLHEAD CITY,	AZ	LIC	0.04	1468	242	3	0.9	0.1613
131264	8384	BLFT-19890724TA	K244CV	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	LIC	0.084	1164	244	1	64.6	0
1570700	145073	BNPFT-20130826AAI	K248CO	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	CP	0.05	2353	248	3	78.7	0
612124	30449	BLFT-20020913AAB	K242AQ	DONALD F. HENDREN	D	KINGMAN	AZ	LIC	0.038	2353	242	3	78.7	0
1459077	40757	BMLH-20111201LCE	KKLZ	BEASLEY MEDIA GROUP, LLC	C	LAS VEGAS	NV	LIC	100	1056	242	3	87.2	0
982608	92496	BLFTB-20031216AA/	KVEG-FM1	KEMP BROADCASTING, INC.	D	HENDERSON	NV	LIC	20	1020	248	3	87.4	0
1352531	9039	BLFT-20100108AAQ	K246AE	ADVANCE MINISTRIES, INC. D/B//	D	LAKE HAVASU CI	AZ	LIC	0.01	1440	246	1	92.9	0
1654878	38307	BLFT-20141015ACE	K242AR	DONALD F. HENDREN	D	LAKE HAVASU CI	AZ	LIC	0.01	1440	242	3	92.9	0
1259788	77754	BLH-20080731ACG	KRCY-FM	RICK L. MURPHY	C3	LAKE HAVASU CI	AZ	LIC	0.26	1451	244	1	92.9	0
1547652	156483	BNPFT-20130326AGI	K243BR	DONALD F. HENDREN	D	KINGMAN	AZ	CP	0.17	974	243	2	101.8	0
232130	38450	BLH-19960913KA	KXPT	LOTUS BROADCASTING CORP.	C	LAS VEGAS	NV	LIC	25	2582	246	1	104.6	0
1570011	152189	BNPFT-20130821AB(	K247CD	DONALD F. HENDREN	D	KINGMAN	AZ	CP	0.028	1521	247	2	118.6	0
573342	83278	BLH-20010711AAI	KVEG	KEMP BROADCASTING, INC.	C	MESQUITE	NV	LIC	100	1203	248	3	148.8	0
189677	14880	BLFT-19930907TG	K242AC	FREEPORT-MCMORAN BAGDAD	D	BAGDAD	AZ	LIC	0.046	1215	242	3	161.9	0
189678	14876	BLFT-19930907TH	K247AC	FREEPORT-MCMORAN BAGADAI	D	BAGDAD	AZ	LIC	0.046	1215	247	2	161.9	0
1378655	164142	BLH-20100623AEP	KYLI	LKCM RG LICENSES, LLC	C	BUNKERVILLE	NV	LIC	93	1755	244	1	163.8	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
1571653	156403	BNPFT-20130829AA/	K298BU	DONALD F. HENDREN	D	PEACH SPRINGS	AZ	CP	0.178	1337	298	53	42.6	32.6
1650486	9036	BPFT-20130906AAE	K268AC	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	CP	0.135	2554	298	53	79.2	69.2



