

Non-Interference Compliance

Regarding Facility id 201569

Channel 246

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.

Note: The adjacent channel study on page 3 indicates prohibitive co-channel overlap with the CP (BPFT-20160321ABN) for K231BP. This CP was cancelled at the request of the permittee, Carl Rieck.

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 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
1378655	BLH20100623AEP	KYLI	65.7	65.7
1761905	BPH20170725ABT	KYLI	72.4	72.3
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				65.7

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 **65.7 dBμ**, this makes the proposed translator's worst-case interfering contour **105.7 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **575.4 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: There are no occupied buildings or major roads within the zone of predicted interference so 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: CA5-FM/CP/RM @ 345°
CORAGL: 27 m
Maximum ERP: 0.25 kW
Interfering Contour: 105.7 dBμ
Max Int. Contour Distance: 575.4 m

Adjacent Channel Study **For Station K299BY, Facility_id: 201569**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1724678	58260	BPFT-20160321ABN	K231BP	CARL L. RIECK	D	ST. GEORGE	UT	CP	0.25	958	246	0	24.8	119.106
1761905	164142	BPH-20170725ABT	KYLI	FARMWORKER EDUCATIONAL R	C	BUNKERVILLE	NV	CP	13	2349	244	2	48.5	0.2782
1378655	164142	BLH-20100623AEP	KYLI	FARMWORKER EDUCATIONAL R	C	BUNKERVILLE	NV	LIC	93	1755	244	2	61	0.2782
1562749	61382	BLFT-20130712AAC	K249EQ	CCR-ST. GEORGE IV, LLC	D	ST. GEORGE	UT	LIC	0.075	953	249	3	24.9	0
113137	38357	BLFT-19880531TD	K244DD	WESTERN KANE COUNTY SPECI	D	ORDERVILLE, ET	UT	LIC	0.053	1830	244	2	90.3	0
1196119	142762	BLFT-20070723ABK	K246BK	LEGACY PRESERVATION FOUNC	D	MOAPA	NV	LIC	0.01	649	246	0	92.8	0
279819	85690	BLFT-19990112TH	K247AG	UTAH STATE UNIVERSITY OF AG	D	CEDAR CITY	UT	LIC	0.01	2652	247	1	96.7	0
1647415	147973	BLFT-20140818AAE	K245BF	CANYON MEDIA GROUP, LLC	D	CEDAR CITY	UT	LIC	0.25	2598	245	1	96.8	0
573342	83278	BLH-20010711AAI	KVEG	KEMP BROADCASTING, INC.	C	MESQUITE	NV	LIC	100	1203	248	2	103.1	0
207612	29189	BLFT-19950324TA	K243AG	IRON COUNTY	D	PAROWAN	UT	LIC	0.07	2059	243	3	119.6	0
112201	51444	BLFT-19880506TC	K244DC	GARFIELD COUNTY	D	PANGUITCH	UT	LIC	0.048	2097	244	2	141.6	0
1442267	72224	BLH-20100520AAP	KWUT	SANPETE COUNTY BROADCAST	C	ELSINORE	UT	LIC	31	3600	249	3	199	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
1756296	145467	BLFT-20170503ABA	K299BU	CCR-ST. GEORGE IV, LLC	D	CEDAR CITY	UT	LIC	0.25	2416	299	53	89.1	79.1

3257 1 NE
(LIZARD POINT)



