

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 152102

Channel 283

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 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 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
218422	BLFT19960111TP	K280EH	113.2	100
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			100

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 **100 dB μ** , this makes the proposed translator's worst-case interfering contour **140 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **2.2 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").

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: YA7-FML(V)
CORAGL: 6 m
Maximum ERP: 0.01 kW
Interfering Contour: 140 dB μ
Max Int. Contour Distance: 2.2 m

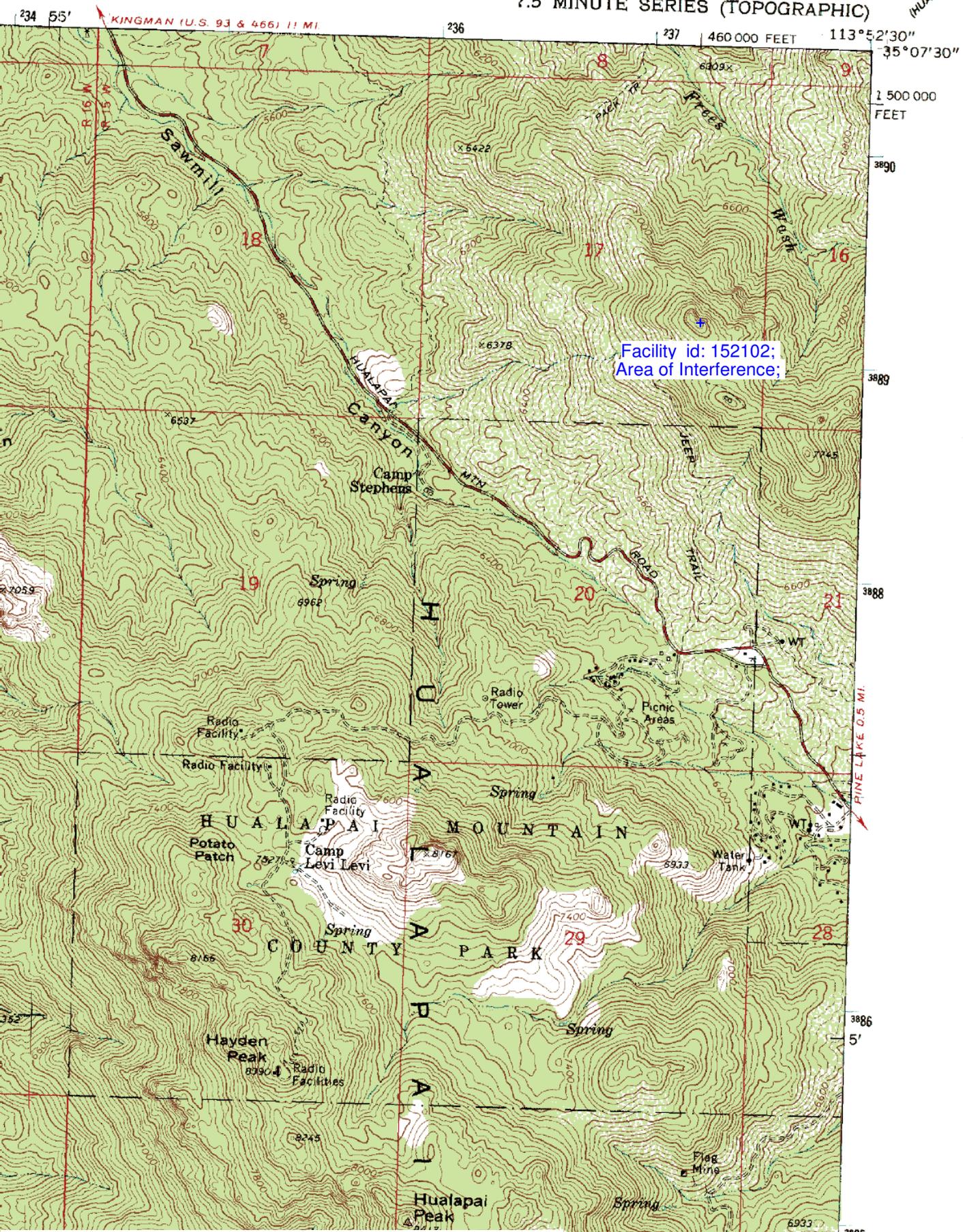
Adjacent Channel Study For Station K283BZ, Facility_id: 152102

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
218422	30448	BLFT-19960111TP	K280EH	STEVEN M. GREELEY	D	KINGMAN	AZ	LIC	0.01	2348	280	3	0	0.0088
1571522	190381	BNPH-20120529ALI	KNIT	JER LICENSES, LLC	A	PEACH SPRINGS	AZ	CP	1.1	1865	280	3	54.7	0
1569999	150768	BNPFT-20130821ABI	K284CB	DONALD F. HENDREN	D	PEACH SPRINGS	AZ	CP	0.0155	1815	284	1	54.7	0
1682340	145599	BMPFT-20150706ABI	K285GQ	ADVANCE MINISTRIES, INC. D/B/A	D	HAVASU HEIGHTS	AZ	CP MOD	0.01	1437	285	2	68.6	0
1644209	67363	BLFT-20140716AEV	K280DL	TOWER COMMUNICATIONS	D	LAKE HAVASU CITY	AZ	LIC	0.25	1436	280	3	68.6	0
1205150	39562	BLH-20070917ADR	KZUL-FM	MAD DOG WIRELESS, INC.	C3	LAKE HAVASU CITY	AZ	LIC	0.23	1441	283	0	68.6	0
1723527	142491	BMPFT-20160307AAI	K262CM	COMMUNITY TRANSLATOR NETWORK	D	NEEDLES	CA	APP	0.25	196	281	2	73.3	0
1681280	164263	BLH-20150623ABJ	KISK	SMOKE AND MIRRORS, LLC	C2	CAL-NEV-ARI	NV	LIC	1.5	1515	285	2	80.2	0
1722393	156446	BMPFT-20160222ABI	K280FS	DONALD F. HENDREN	D	NOTHING	AZ	CP MOD	0.01	1004	280	3	86.4	0
1598426	29021	BPH-20080915AFP	KHOV-FM	UNIVISION RADIO LICENSE CORP	C0	WICKENBURG	AZ	CP	100	1565	286	3	145.6	0
1492846	52818	BMLH-20120321AES	KAJM	SIERRA H BROADCASTING, INC.	C	CAMP VERDE	AZ	LIC	40	2323	282	1	171.2	0
235838	19062	BLH-19961122KB	KFRH	SILVER STATE BROADCASTING INC	C	NORTH LAS VEGAS	NV	LIC	24.5	2593	282	1	174.5	0
1025885	63769	BLH-20041115ACG	KJUL	SUMMIT AMERICAN, INC.	C1	MOAPA VALLEY	NV	LIC	100	775	284	1	183.6	0
1244591	51731	BLH-20080429AAO	KQRT	ENTRAVISION HOLDINGS, LLC	C2	LAS VEGAS	NV	LIC	50	1097	286	3	190.3	0

HUALAPAI PEAK QUADRANGLE
ARIZONA-MOHAVE CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

2224 ft NE
(HUALAPAI SPRING)





40 yds

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