

Non-Interference Compliance

Regarding Facility id 156733

Channel 295

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 roads or buildings 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1143752	BLH20060804AFO	KEGX	107.5	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 dBμ**, this makes the proposed translator's worst-case interfering contour **140 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **8.6 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 roads or buildings 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 @ 340°
CORAGL:	12 m
Maximum ERP:	0.15 kW
Interfering Contour:	140 dBμ
Max Int. Contour Distance:	8.6 m

Adjacent Channel Study **For Station K298AQ, Facility_id: 156733**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1143752	53140	BLH	20060804AFO	KEGX	REVITALIZATION PARTNERS, LLC, GENERAL R	C0	RICHLAND	WA	LIC	100	742.8	293	2	7.3	0.1364
1177457	155820	BLFT	20070319ABY	K295AN	HORIZON CHRISTIAN FELLOWSHIP	D	GRANDVIEW	WA	LIC	0.019	581	295	0	46.3	0
1393668	155141	BLFT	20100512AIQ	K295AV	ALEXANDRA COMMUNICATIONS, INC.	D	WALLA WALLA	WA	LIC	0.24	1056	295	0	77.5	0
1191469	156740	BLFT	20070618ACE	K295AU	LYLE DODGE	D	MOSES LAKE	WA	LIC	0.25	395	295	0	103.2	0
650197	156903	BNPFT	20030317IUJ	NEW	LYLE DODGE	D	WAPATO	WA	APP	0.015	646	293	2	103.4	0
422011	49723	BLH	19990915AVQ	KFFM	TOWNSQUARE MEDIA YAKIMA LICENSE, LLC	C	YAKIMA	WA	LIC	100	994	297	2	109.1	0
401713	49723	BXLH	19991001ABU	KFFM	TOWNSQUARE MEDIA YAKIMA LICENSE, LLC	C	YAKIMA	WA	LIC	0.3	954	297	2	109.1	0

Intermediate Frequencies (53 and 54 channels difference):

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
400122	49731	BLH	19990910AAE	KRCW	FARMWORKER EDUCATIONAL RADIO NETWORK,	C2	ROYAL CITY	WA	LIC	19.5	531	242	53	67.7	52.7
1052749	164091	BLH	20050322ADE	KLKY	JACOBS RADIO PROGRAMMING, LLC	C2	STANFIELD	OR	LIC	8.5	1006	241	54	78.1	63.1

