

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 143532

Channel 227

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.

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
974139	BLH20040129AJH	KBLQ-FM	215.3	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 **3 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

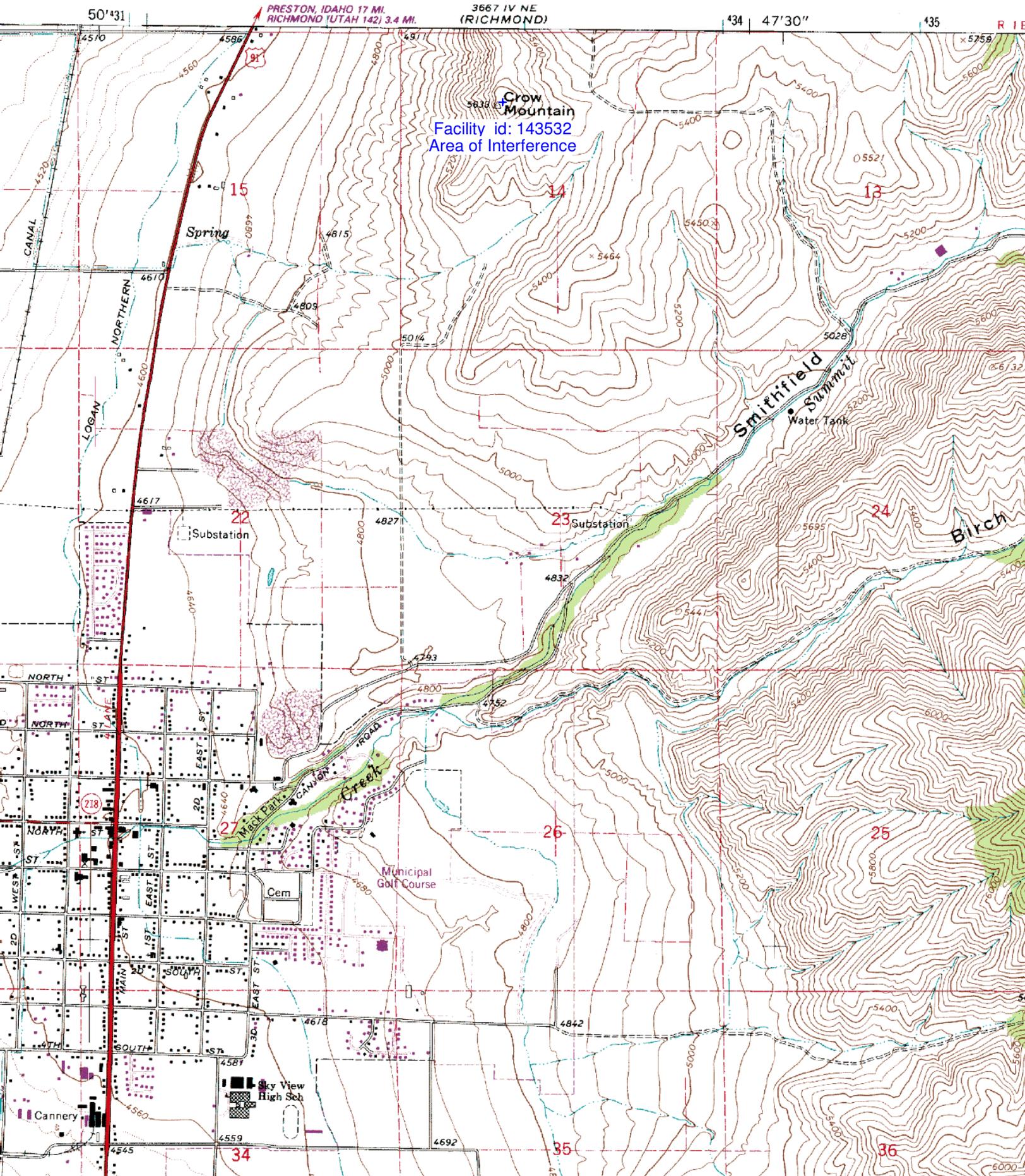
Note: The only structure within the zone of predicted interference is an unoccupied communications building so , in accordance with 47 C.F.R. § 74.1204(d) and the clarification provided by the FCC in the decision *Re: Living Way Ministries* (FCC 02-244), a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

Antenna Manufacturer: NIC
Antenna Model: BKG77
CORAGL: 11 m
Maximum ERP: 0.018 kW
Interfering Contour: 140 dBμ
Max Int. Contour Distance: 3 m

**Adjacent Channel Study
For Station K227CO, Facility_id: 143532**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
974139	63832	BLH-20040129AJH	KBLQ-FM	SUN VALLEY RADIO, INCORPOR	C1	LOGAN	UT	LIC	100	1746	225	2	0	0.1074
1783116	93021	BPFT-20180412AAH	K202EJ	CALVARY CHAPEL OF TWIN FALI	D	WELLSVILLE	UT	APP	0.019	1734	229	2	31.3	0
1345684	123319	BLFTB-20091201AO2	KBLQ-FM1	SUN VALLEY RADIO, INC.	D	TREMONTON	UT	LIC	11.4	1764	225	2	37.3	0
1206709	144752	BLFT-20070924ABK	K228EP	SUN VALLEY RADIO, INC.	D	LAKETOWN	UT	LIC	0.01	2300	228	1	44.7	0
1726666	157646	BPFT-20160418AAG	K256BB	SUN VALLEY RADIO, INC.	D	NORTH OGDEN	UT	CP	0.25	1585	229	2	61.2	0
1613617	146566	BLFT-20131219EGW	K224EJ	OLD WEST MEDIA, INC.	D	MONTPELIER	ID	LIC	0.25	1998	224	3	80.1	0
1746865	28254	BLH-20161213ABJ	KZBQ	IDAHO WIRELESS CORPORATIO	C0	POCATELLO	ID	LIC	100	1821	230	3	124.7	0
619055	11238	BLH-20021203ACG	KUBL-FM	RADIO LICENSE HOLDING CBC, I	C	SALT LAKE CITY	UT	LIC	25	2803	227	0	138.7	0



PRESTON, IDAHO 17 MI.
RICHMOND (UTAH 142) 3.4 MI.

3667 IV NE
(RICHMOND)

434 47'30"

435

R 1 E

Crow Mountain
Facility id: 143532
Area of Interference

Spring

Substation

Substation

Smithfield Summit
Water Tank

Municipal Golf Course

Cem

Sky View High Sch

Cannery

