

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 30450

Channel 274

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
1327092	BLH20090820ABV	KJJJ	63.5	63.5
1756428	BLH20170504ABE	KDMM	65.6	64.8
1797135	BLFTB20181206AAA	KJJJ-FM1	119.5	100
1798617	BPFTB20190107AAF	KJJJ-FM1	149.8	63.8
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				63.5

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 **63.5 dBμ**, this makes the proposed translator's worst-case interfering contour **103.5 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **741.3 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: There are no occupied buildings or 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: BEX
Antenna Model: LOG-R @ 265°
CORAGL: 11 m
Maximum ERP: 0.25 kW
Interfering Contour: 103.5 dBμ
Max Int. Contour Distance: 741.3 m

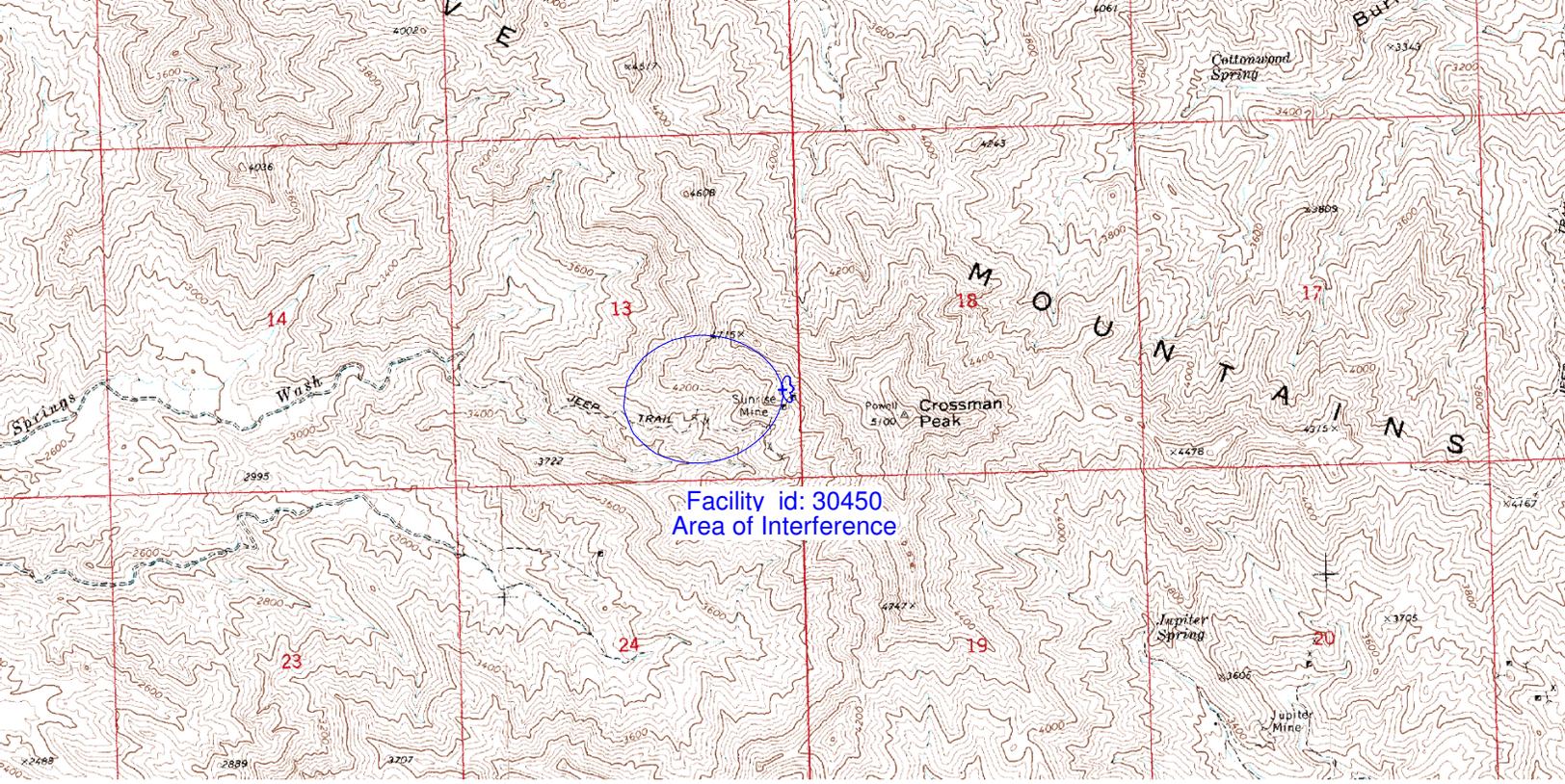
**Adjacent Channel Study
For Station K270AD, Facility_id: 30450**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1756428	198737	BLH-20170504ABE	KDMM	RIVER RAT RADIO, LLC	B1	PARKER STRIP	AZ	LIC	2.8	537	276	2	26.7	0.5853
1798617	178460	BPFTB-20190107AAF	KJJJ-FM1	STEVEN M. GREELEY	D	LAKE HAVASU CI	AZ	APP	0.6	1384	272	2	0	0.2964
1797135	178460	BLFTB-20181206AA/	KJJJ-FM1	STEVEN M. GREELEY	D	LAKE HAVASU CI	AZ	LIC	0.6	1437	272	2	0.2	0.2964
1327092	63410	BLH-20090820ABV	KJJJ	STEVEN M. GREELEY	C1	LAUGHLIN	NV	LIC	17	1367	272	2	55.9	0.2964
1754845	156346	BPFT-20170410AAU	K274CO	AIRCRAFT STORAGE SOLUTIONS	D	PEACH SPRINGS	AZ	CP	0.001	835	274	0	55.5	0
1748059	156346	BLFT-20170103AAB	K274CO	AIRCRAFT STORAGE SOLUTIONS	D	PEACH SPRINGS	AZ	LIC	0.001	1215	274	0	56.1	0
1773296	201367	BNPFT-20171201ABI	K277DK	CAMERON BROADCASTING, INC.	D	BULLHEAD CITY	AZ	CP	0.2	1239	277	3	56.2	0
86505	67805	BLFT-19860312TS	K276BM	FAITH COMMUNICATIONS CORP	D	KINGMAN	AZ	LIC	0.082	2352	276	2	66	0
1352536	181248	BLFTB-20100108ABT	KJJJ-FM2	STEVEN M. GREELEY	D	KINGMAN	AZ	LIC	0.5	2352	272	2	68.7	0
1764486	61510	BMPH-20170815AAS	KAHM	PHOENIX RADIO BROADCASTING	C	SPRING VALLEY	AZ	CP MOD	25.5	2385	271	3	171.3	0
572807	57281	BLH-20010709ABU	KCYE	BEASLEY MEDIA GROUP LICENS	C	BOULDER CITY	NV	LIC	96	1390	274	0	173.3	0
565018	21497	BMLH-20010517AAX	KDUQ	DOS COSTAS COMMUNICATIONS	A	LUDLOW	CA	LIC	6	561	273	1	181.6	0
1565231	21497	BSTA-20130802ABP	KDUQ	DOS COSTAS COMMUNICATIONS	A	LUDLOW	CA	APP	0.08	561	273	1	181.6	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
1400429	90917	BLED-20100125ADU	KLKI	EDUCATIONAL MEDIA FOUNDAT	C0	DOLAN SPRINGS	AZ	LIC	30	1492	220	54	92.4	67.4



Facility id: 30450
Area of Interference

