

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 201680

Channel 222

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
1400429	BLED20100125ADU	KLKI	64	63.9
1653759	BPED20141007ACW	KLKI	62.8	62.8
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				62.8

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 **62.8 dB μ** , this makes the proposed translator's worst-case interfering contour **102.8 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **803.5 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: CL-FM @ 2°
CORAGL: 13 m
Maximum ERP: 0.25 kW
Interfering Contour: 102.8 dB μ
Max Int. Contour Distance: 803.5 m

**Adjacent Channel Study
For Station NEW, Facility_id: 201680**

Co-channel through third adjacent:

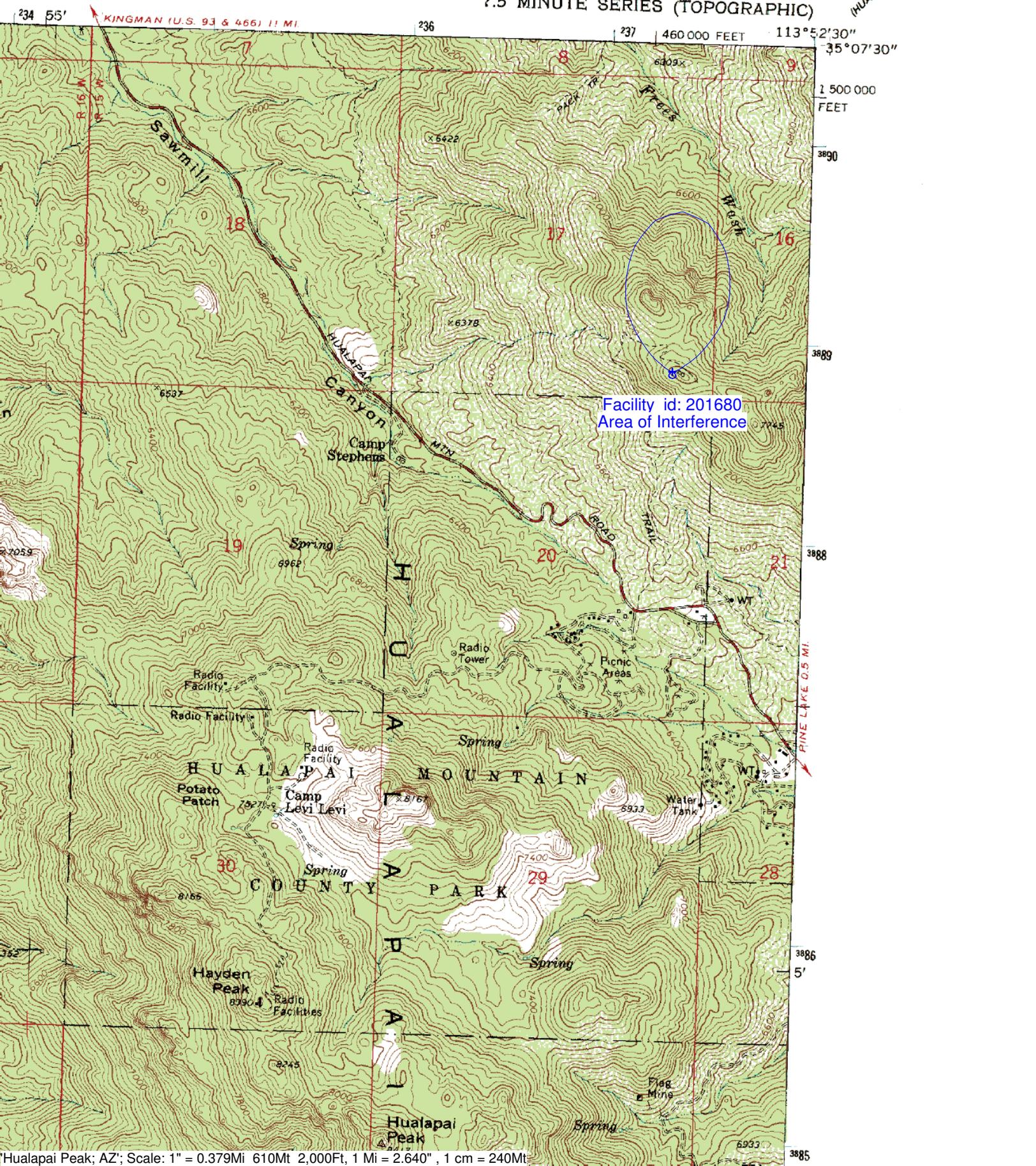
App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1400429	90917	BLED-20100125ADU	KLKI	EDUCATIONAL MEDIA FOUNDAT	C0	DOLAN SPRINGS	AZ	LIC	30	1492	220	2	79.7	0.2275
1653759	90917	BPED-20141007ACW	KLKI	EDUCATIONAL MEDIA FOUNDAT	C0	DOLAN SPRINGS	AZ	CP	25	1513	220	2	80.4	0.2275
1645280	967	BLFT-20140728AAM	K224BV	ADVANCE MINISTRIES, INC. D/B/	D	KINGMAN	AZ	LIC	0.25	2356	224	2	2.7	0
1628890	141866	BLFT-20140310ABB	K222AV	AIRCRAFT STORAGE SOLUTIONS	D	PARKER	AZ	LIC	0.25	1441	222	0	68.3	0
1758325	124874	BLL-20170607AAI	KCAN-LP	TRI-STATE CHRISTIAN RADIO	L1	NEEDLES	CA	LIC	0	219.4	223	1	73.4	0
1414295	48355	BLFT-20110114ABN	K219LM	NEVADA PUBLIC RADIO	D	LAKE HAVASU CI	AZ	LIC	0.09	151	219	3	84.1	0
1634200	122267	BLFT-20140416ABI	K220JW	CALVARY CHAPEL OF TWIN FALLS	D	LAS VEGAS	NV	LIC	0.01	1237	220	2	155.7	0
232131	38451	BLH-19960913KB	KOMP	LOTUS BROADCASTING CORP.	C	LAS VEGAS	NV	LIC	25	2583	222	0	174.7	0
1641214	27982	BMLH-20140619ABW	KRRN	ENTRAVISION HOLDINGS, LLC	C	MOAPA VALLEY	NV	LIC	100	1173	224	2	177.5	0
1196121	144580	BLFT-20070723ABM	K222BM	EDGEWATER BROADCASTING, II	D	MOAPA	NV	LIC	0.015	652	222	0	183.9	0
1243459	171488	BLFTB-20080327ADC	KRRN-FM2	ENTRAVISION HOLDINGS, LLC	D	LAS VEGAS	NV	LIC	20	1079	224	2	190.6	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
1756428	198737	BLH-20170504ABE	KDMM	RIVER RAT RADIO, LLC	B1	PARKER STRIP	AZ	LIC	2.8	537	276	54	92.7	80.7

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

2224 ft NE
(HUALAPAI SPRING)



Facility id: 201680
Area of Interference

