

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 155285

Channel 262

### **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 $\mu$  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 buildings or roads 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1135885	BLH20081120AFT	KKWF	76.8	77.1
1135887	BLH20080730AKM	KISW	76.8	77.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>77.1</b>

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 **77.1 dBμ**, this makes the proposed translator's worst-case interfering contour **117.1 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **31 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 buildings or roads 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:** NIC  
**Antenna Model:** BLD1/P  
**CORAGL:** 6 m  
**Maximum ERP:** 0.01 kW  
**Interfering Contour:** 117.1 dBμ  
**Max Int. Contour Distance:** 31 m

**Adjacent Channel Study  
For Station K262CI, Facility\_id: 155285**

**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1135887	47750	BLH-20080730AKM	KISW	ENTERCOM LICENSE, LLC	C	SEATTLE	WA	LIC	67	940	260	2	53.9	0.0597
1135885	6367	BLH-20081120AFT	KKWF	ENTERCOM LICENSE, LLC	C	SEATTLE	WA	LIC	67	940	264	2	53.9	0.0597
1722171	194116	BLL-20160218AAQ	KUCP-LP	UKRAINIAN CHURCH OF EVANGI	L1	KENT	WA	LIC	0	160	262	0	31.6	0
1649107	196473	BNPL-20131114AZW	KOLP-LP	OLYMPIA ALL AGES PROJECT	L1	OLYMPIA	WA	CP	0	187	262	0	49.9	0
1643736	195500	BNPL-20131114AXK	KHUH-LP	HOLLOW EARTH RADIO	L1	SEATTLE	WA	CP	0	42	262	0	56.1	0
1734248	142916	BMPFT-20160729AD	K263BS	PREMIER BROADCASTERS, INC.	D	CENTRALIA	WA	CP MOD	0.25	73	263	1	64.7	0
1563711	140810	BLFT-20130717ABB	K259BG	SOUTH SOUND BROADCASTING	D	CHEHALIS	WA	LIC	0.25	150	259	3	67.2	0
1735252	146318	BPFT-20160729ANS	K300CU	NORTHWEST ROCK N ROLL PRE	D	SHORELINE	WA	APP	0.25	192	262	0	77.9	0
1719877	146318	BPFT-20160129ACK	K300CU	NORTHWEST ROCK N ROLL PRE	D	SHORELINE	WA	APP	0.25	192	262	0	77.9	0



