

Non-Interference Compliance

Regarding Facility id 202368

Channel 256

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.

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
1423918	BLH20110422AAN	KUPL	81.1	81.1
166430	BLH19911106KG	KWJJ-FM	81.9	81.2
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				81.1

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 **81.1 dBμ**, this makes the proposed translator's worst-case interfering contour **121.1 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **97.7m** 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 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: PSI
Antenna Model: FML-1-DA
CORAGL: 18 m
Maximum ERP: 0.25 kW
Interfering Contour: 121.1 dBμ
Max Int. Contour Distance: 97.7 m

Adjacent Channel Study **For Station K256DF, Facility_id: 202368**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1423918	4114	BLH-20110422AAN	KUPL	ALPHA MEDIA LICENSEE LLC	C1	PORTLAND	OR	LIC	24	594	254	2	26.8	0.9247
166430	13738	BLH-19911106KG	KWJJ-FM	ENTERCOM LICENSE, LLC	C1	PORTLAND	OR	LIC	50	480	258	2	27.4	0.9247
1793694	202339	BNPFT-20181029AAL	NEW	DOLPHIN RADIO, LLC	D	HILLSBORO	OR	APP	0.099	117	256	0	16	0
1776515	202339	BNPFT-20180129AEC	NEW	DOLPHIN RADIO, LLC	D	HILLSBORO	OR	APP	0.099	117	256	0	16	0
1683862	195582	BLL-20150728ACK	KSFL-LP	WE MAKE THE MEDIA INC.	L1	PORTLAND	OR	LIC	0	100	256	0	32.6	0
1055280	134505	BLL-20050328ADT	KGLS-LP	GOOD LIFE RADIO, INC.	L1	TILLAMOOK	OR	LIC	0	28.7	256	0	67.2	0
1373953	85889	BLFT-20100617AHZ	K259BT	EDUCATIONAL MEDIA FOUNDAT	D	TILLAMOOK	OR	LIC	0.013	446	259	3	73.8	0
1736188	148192	BLFT-20160812AAT	K256CQ	BICOASTAL MEDIA LICENSES IV,	D	LONGVIEW	WA	LIC	0.25	324	256	0	92.2	0
1622403	38910	BLH-20140129ABF	KLMY	OMG FCC LICENSES LLC	C3	LONG BEACH	WA	LIC	25	94	259	3	134.8	0
1184962	139549	BLFT-20070508ACC	K258AR	CALVARY CHAPEL OF TWIN FAL	D	CLOVERDALE	OR	LIC	0.01	672	258	2	137.7	0
1187000	40845	BMLH-20070606ABU	KODZ	BICOASTAL MEDIA LICENSES V,	C	EUGENE	OR	LIC	100	738	256	0	137.7	0
1784227	202478	BNPFT-20180508ACI	K254DN	LANE COUNTY SCHOOL DISTRIC	D	EUGENE	OR	CP	0.099	424	254	2	150.8	0
210716	41329	BLFT-19950626TB	K256AC	CATHOLIC BROADCASTING NOR	D	THE DALLES	OR	LIC	0.01	968	256	0	151.1	0
1289865	33622	BMLH-20090211ABR	KDDS-FM	BUSTOS MEDIA HOLDINGS, LLC	C	ELMA	WA	LIC	64	1033	257	1	219.7	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
1114947	41330	BLED-20060221ADR	KBVM	CATHOLIC BROADCASTING NOR	C2	PORTLAND	OR	LIC	3.5	528	202	54	26.8	11.8
1473062	172599	BLED-20111129ABU	KMUZ	WILLAMETTE INFORMATION, NEI	A	TURNER	OR	LIC	0.032	352	203	53	63.5	53.5
1127824	121862	BMLE-20060428AC	KAIK	EDUCATIONAL MEDIA FOUNDAT	A	TILLAMOOK	OR	LIC	0.06	463	203	53	73.8	63.8
1667492	50615	BLFT-20150115AAM	K203FI	OREGON PUBLIC BROADCASTIN	D	GLENEDEN BEAC	OR	LIC	0.17	121	203	53	96.1	86.1



