

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 202402

Channel 263

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
1006848	BLH20040817AAG	KZDX	85.6	85.6
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			85.6

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 **85.6 dBμ**, this makes the proposed translator's worst-case interfering contour **125.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **58.2 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 major 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: NIC
Antenna Model: BKG77
CORAGL: 75 m
Maximum ERP: 0.25 kW
Interfering Contour: 125.6 dBμ
Max Int. Contour Distance: 58.2 m

Adjacent Channel Study For Station NEW, Facility_id: 202402

Co-channel through third adjacent:

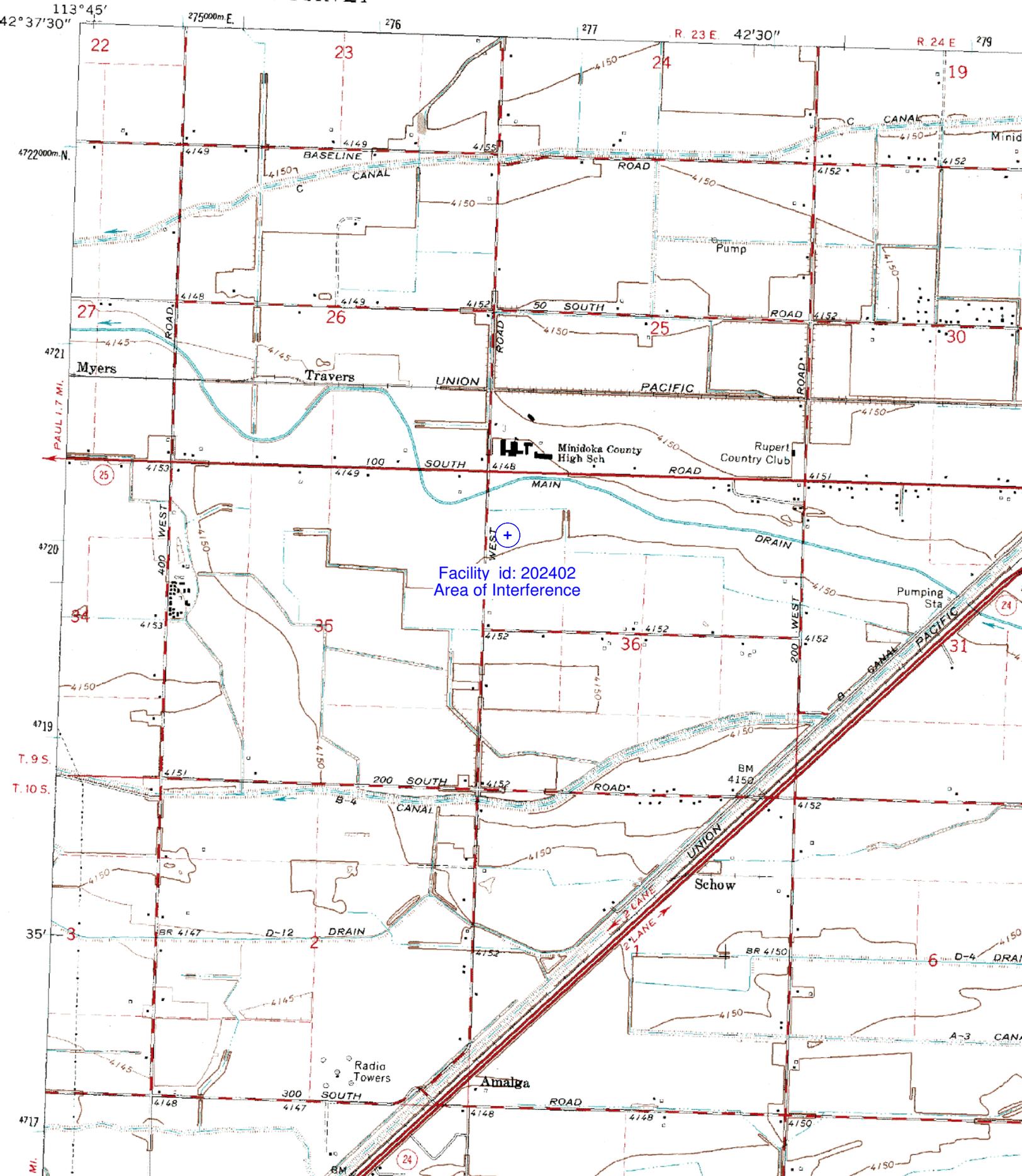
App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1006848	42885	BLH-20040817AAG	KZDX	LEE FAMILY BROADCASTING, INC	C	BURLEY	ID	LIC	27	2536	260	3	31.3	1.4918
1625836	122265	BLFT-20140218AGB	K266BJ	CALVARY CHAPEL OF TWIN FALLS	D	BURLEY	ID	LIC	0.023	1597	266	3	20.2	0
1771163	200247	BNPFT-20171220ABF	K262DD	SALT & LIGHT RADIO, INC.	D	WENDELL	ID	CP	0.25	1109	262	1	78.6	0
1747302	153879	BLFT-20161219AAW	K262CL	IDAHO WIRELESS CORPORATION	D	POCATELLO	ID	LIC	0.25	1820	262	1	102.6	0
1677163	146523	BLFT-20150429ABQ	K266BY	RIVERBEND COMMUNICATIONS, INC	D	POCATELLO	ID	LIC	0.099	1784	266	3	103.3	0
1748984	145799	BLFT-20170113ABK	K260CF	TAUNA M. BARBIERI	D	POCATELLO	ID	LIC	0.025	1783	260	3	103.3	0
1457580	178841	BLFTB-20111109AVE	KSNA-FM1	SANDHILL MEDIA GROUP, LLC	D	POCATELLO	ID	LIC	2.2	1443	264	1	107.8	0
1634478	28251	BLFT-20140422ABV	K262BZ	IDAHO STATE BOARD OF EDUCATION	D	BELLEVIEW	ID	LIC	0.125	2762	262	1	130.1	0
1356177	164259	BMPH-20090121ACC	KXML	COCHISE MEDIA LICENSES LLC	C	FAIRFIELD	ID	CP MOD	40	2268	260	3	156.8	0
1642130	72658	BMLH-20140624ACD	KPDA	RADIO RANCHO, LLC	C	MOUNTAIN HOME	ID	LIC	64	2262	264	1	156.8	0
1422415	55237	BLH-20110330ACH	KSNA	SANDHILL MEDIA GROUP, LLC	C1	IDAHO FALLS	ID	LIC	100	1789	264	1	162.5	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
1126125	8414	BLED-20060403ANA	KAWZ	CALVARY CHAPEL OF TWIN FALLS	C0	TWIN FALLS	ID	LIC	100	1475	210	53	58.3	33.3

3259 (LINE
RILEY NE)

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



Facility id: 202402
Area of Interference

