[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 152313 Channel 239

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.

Note: The only structure within the zone of predicted interference is an unoccupied communications building 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1750488	BLH20170202AAC	KID-FM	71.4	71.4
		Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour		**71.4**

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 **71.4 dBµ**, this makes the proposed translator's worst-case interfering contour **111.4 dBµ.** By the free-space equation, this contour is calculated to extend a maximum of **190.7 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 structure within the zone of predicted interference is an unoccupied communications building 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:	**BKG77-2(FW) @ 342°**
CORAGL:	**12 m**
Maximum ERP:	**0.102 kW**
Interfering Contour:	**111.4 dBµ**
Max Int. Contour Distance:	**190.7 m**

Adjacent Channel Study
For Station K239BN, Facility_id: 152313

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1750488	22195	BLH-20170202AAC	KID-FM	RICH BROADCASTING IDAHO LS	C	ABERDEEN	ID	LIC	100	2026	241	2	55.4	0.4782
1720133	145904	BPFT-20160129AYG	K273BU	TED W. AUSTIN, JR.	D	REXBURG	ID	CP	0.25	1541	236	3	58	0
1216027	139608	BLFT-20070822ADX	K239AU	RP BROADCASTING LS, LLC	D	DRIGGS	ID	LIC	0.1	2678	239	0	66.5	0
1725895	145719	BLFT-20160406ABU	K237FA	CARL WATKINS	D	POCATELLO	ID	LIC	0.25	1783	237	2	67.1	0
1727204	157876	BLFT-20160425AAL	K239BR	EDGEWATER BROADCASTING, II	D	POCATELLO	ID	LIC	0.01	1781	239	0	67.8	0
130901	65279	BLH-19890714KA	KZJH	RP BROADCASTING LS, LLC	C	JACKSON	WY	LIC	100	2474	237	2	102.1	0
1756795	88184	BLH-20170515ABS	KLZX	SUN VALLEY RADIO INC	C3	WESTON	ID	LIC	25	1750	240	1	165.4	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
1735872	12665	BLH-20160804ADM	KIDJ	RJ BROADCASTING LS, LLC	C1	SUGAR CITY	ID	LIC	100	1741	292	53	23.4	1.4
299078	8809	BLFT-144	K292AR	CARIBOU COUNTY TV	D	SODA SPRINGS, I	ID	LIC	0.109	2148	292	53	84.5	74.5

Prepared by Gene Wisniewski
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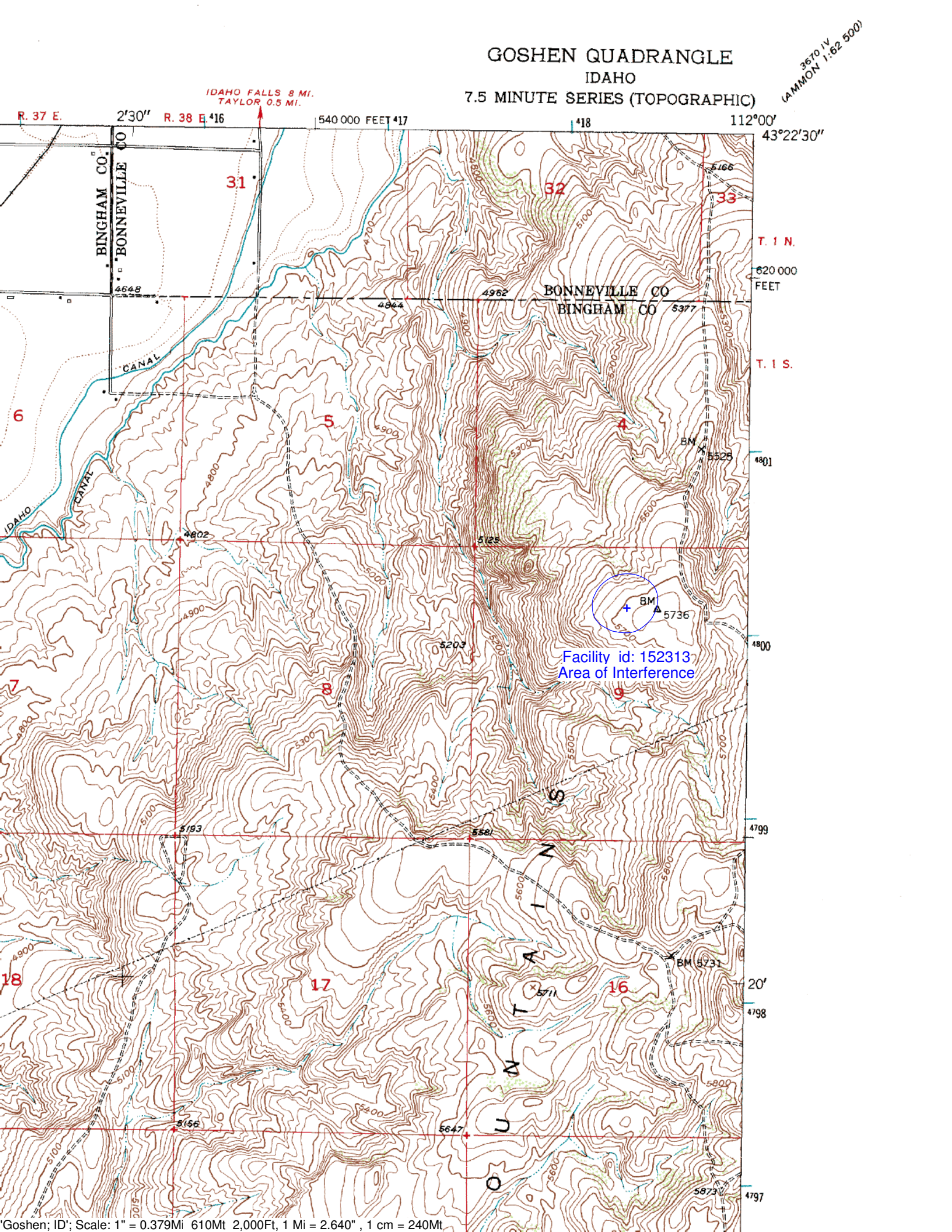
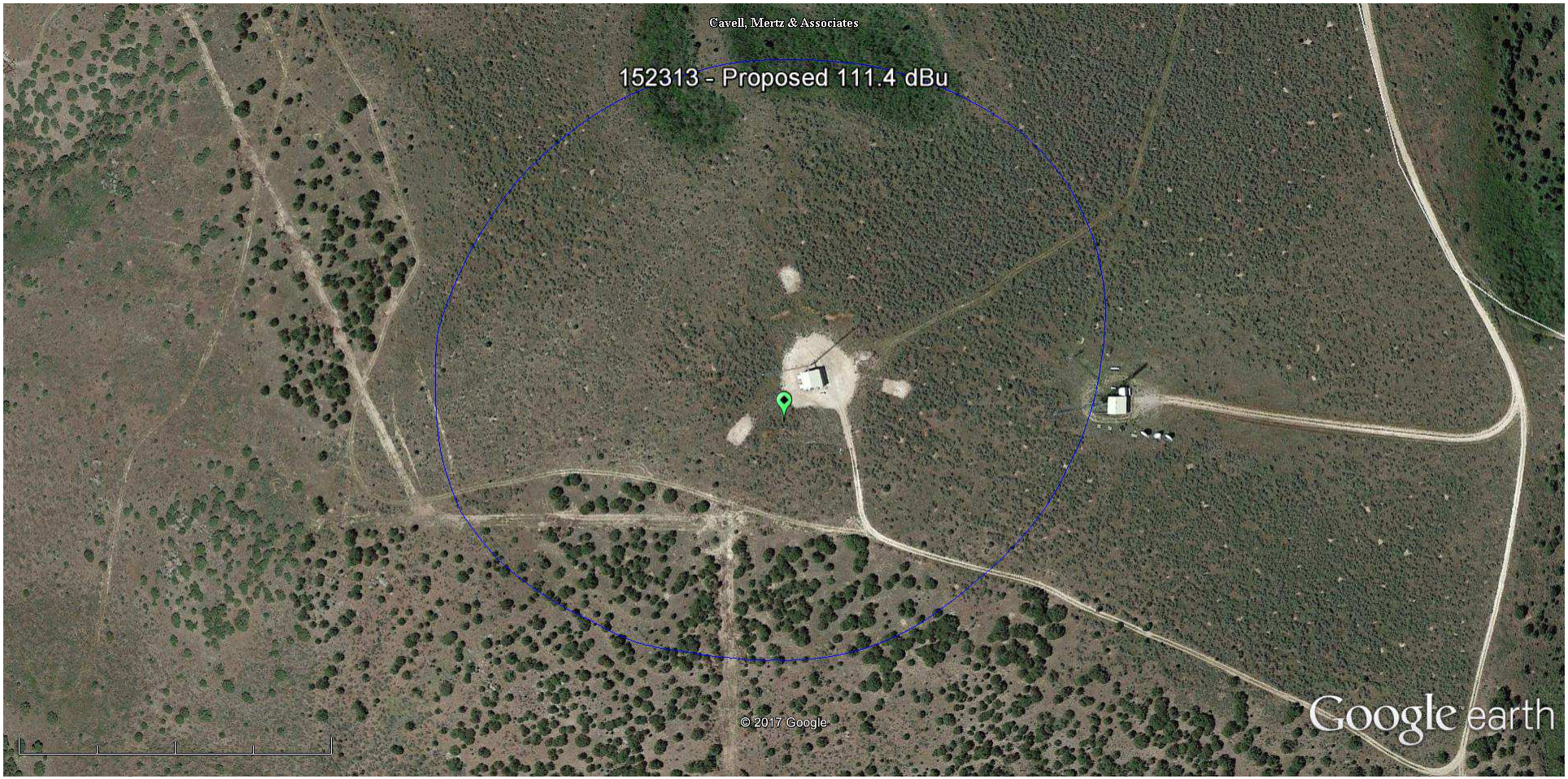


'Goshen; ID'; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640" , 1 cm = 240Mt



Google earth

feet 1000

meters 500