

Non-Interference Compliance

Regarding Facility id 70255

Channel 240

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: There are no occupied buildings or major 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
107941	BLFT19871223TD	K237CK	65	65
1133972	BLFT20060321AEI	K242AS	65	65
1549646	BPFT20130403AAH	K237CK	65	65
1550731	BPFT20130415AAB	K242AS	65	65
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				65

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 **65 dBμ**, this makes the proposed translator's worst-case interfering contour **105 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **623.7 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: There are no occupied buildings or major 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: SCA
Antenna Model: CL-FM @ 156°
CORAGL: 8 m
Maximum ERP: 0.25 kW
Interfering Contour: 105 dBμ
Max Int. Contour Distance: 623.7 m

Adjacent Channel Study **For Station K240CL, Facility_id: 70255**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
1133972	30447	BLFT-20060321AEI	K242AS	STEVEN M. GREELEY	D	BULLHEAD CITY,	AZ	LIC	0.04	1468	242	2	13	0.2275
107941	965	BLFT-19871223TD	K237CK	DONALD F. HENDREN	D	RIVIERA, ETC.	AZ	LIC	0.155	1468	237	3	13	0.2275
1549646	965	BPFT-20130403AAH	K237CK	DONALD F. HENDREN	D	RIVIERA	AZ	CP	0.01	1535	237	3	13.9	0.2275
1550731	30447	BPFT-20130415AAB	K242AS	STEVEN M. GREELEY	D	BULLHEAD CITY,	AZ	CP	0.01	1531	242	2	13.9	0.2275
612124	30449	BLFT-20020913AAB	K242AQ	DONALD F. HENDREN	D	KINGMAN	AZ	LIC	0.038	2353	242	2	67	0
1563642	157085	BNPFT-20030317LAC	NEW	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	APP	0.025	2353	238	2	67	0
1570847	157085	BNPFT-20130826ADR	NEW	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	APP	0.025	2353	238	2	67	0
91544	54319	BLFT-19860822TD	K240BO	DONALD F. HENDREN	D	KINGMAN	AZ	LIC	0.082	2352	240	0	67	0
1579586	156588	BNPFT-20130826AAM	NEW	DONALD F. HENDREN	D	KINGMAN	AZ	APP	0.175	1308	241	1	76.4	0
1402758	38307	BPFT-20101008ACT	K242AR	DONALD F. HENDREN	D	LAKE HAVASU CIT	AZ	CP	0.01	1440	242	2	79.6	0
654292	38307	BLFT-20030327ADG	K242AR	DONALD F. HENDREN	D	LAKE HAVASU CIT	AZ	LIC	0.041	160	242	2	83.2	0
1547652	156483	BNPFT-20130326AGI	K243BR	DONALD F. HENDREN	D	KINGMAN	AZ	CP	0.17	974	243	3	89.8	0
1570844	156459	BNPFT-20130826ADO	NEW	DONALD F. HENDREN	D	KINGMAN	AZ	APP	0.25	887	239	1	92.1	0
1563422	156459	BNPFT-20030317JKD	NEW	DONALD F. HENDREN	D	KINGMAN	AZ	APP	0.25	883	239	1	92.1	0
1459077	40757	BMLH-20111201LCE	KKLZ	KJUL LICENSE, LLC	C	LAS VEGAS	NV	LIC	100	1056	242	2	99.2	0
130453	61527	BLH-19890629KB	KWNR	CITICASTERS LICENSES, INC.	C	HENDERSON	NV	LIC	92	1044	238	2	99.3	0
1523177	170952	BLH-20121107ABT	KPKR	RIVER RAT RADIO, LLC	B1	PARKER	AZ	LIC	6.3	537	239	1	104.5	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
1571372	156889	BNPFT-20130827AEN	NEW	LAKE HAVASU CHARTER SCHOOL, INC.	D	LAKE HAVASU CIT	AZ	APP	0.2	1443	294	54	79.6	69.6
1415155	71525	BMLH-20110126ABC	KSNE-FM	CITICASTERS LICENSES, INC.	C0	LAS VEGAS	NV	LIC	100	1048	293	53	99.2	74.2



