

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 147641

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 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Pages 4 through 5 include a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 6 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 7 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 8 of this exhibit is an aerial photo of the vicinity surrounding the proposed translator's tower site.

**Note: The tallest buildings within the zone of predicted interference are 20ft (6.1m) or less. This proposal provides 30.3m (99.4m) of ground clearance, 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 dB $\mu$  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>
1184649	BLFT20070507AAG	K237ER	79.3	79.3
81834	BLH19850913KA	KQHT	83.4	82.4

Minimum F(50,50) Contour of Adjacent Station within  
Proposed Translator's Standard Interfering Contour **79.3**

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 **79.3 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **119.3 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **120.2 m** from the transmit antenna.

The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 7 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated on the following page at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free-space calculation that neglects any loss due to reflection, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the tower ground level (TGL) by **30.3 m** at the lowest point. The applicant has taken into account USGS quadrangles and relevant aerial photography in stating that no structures, except possibly tower support structures, puncture the area of interference.

**Note: The tallest buildings within the zone of predicted interference are 20ft (6.1m) or less. This proposal provides 30.3m (99.4m) of ground clearance, 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(.5)  
**CORAGL:** 64 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 119.3 dB $\mu$   
**Max Int. Contour Distance:** 120.2 m  
**Min Ground Clearance:** 30.3 m

Depression Angle Below Horizontal	Antenna Relative Field	ERP (watts)	Distance to Interfering Contour from Antenna (m)	Horizontal Distance of Interfering Contour from Tower (m)	Vertical Clearance of Interfering Contour above TGL (m)
5	.973	236.7	117.0	116.5	53.8
10	.933	217.6	112.2	110.5	44.5
15	.855	182.8	102.8	99.3	37.4
20	.777	150.9	93.4	87.8	32.1
25	.664	110.2	79.8	72.3	30.3
30	.560	78.4	67.3	58.3	30.3
35	.456	52.0	54.8	44.9	32.6
40	.365	33.3	43.9	33.6	35.8
45	.292	21.3	35.1	24.8	39.2
50	.227	12.9	27.3	17.5	43.1
55	.172	7.4	20.7	11.9	47.1
60	.126	4.0	15.1	7.6	50.9
65	.096	2.3	11.5	4.9	53.5
70	.072	1.3	8.7	3.0	55.9
75	.056	0.8	6.7	1.7	57.5
80	.046	0.5	5.5	1.0	58.6
85	.039	0.4	4.7	0.4	59.3
90	.035	0.3	4.2	0.0	59.8
Minimum Clearance above TGL:					<b>30.3 m</b>

TX station: TV Mondiale

Site name: Monte Alto

Frequency: 100.00 MHz

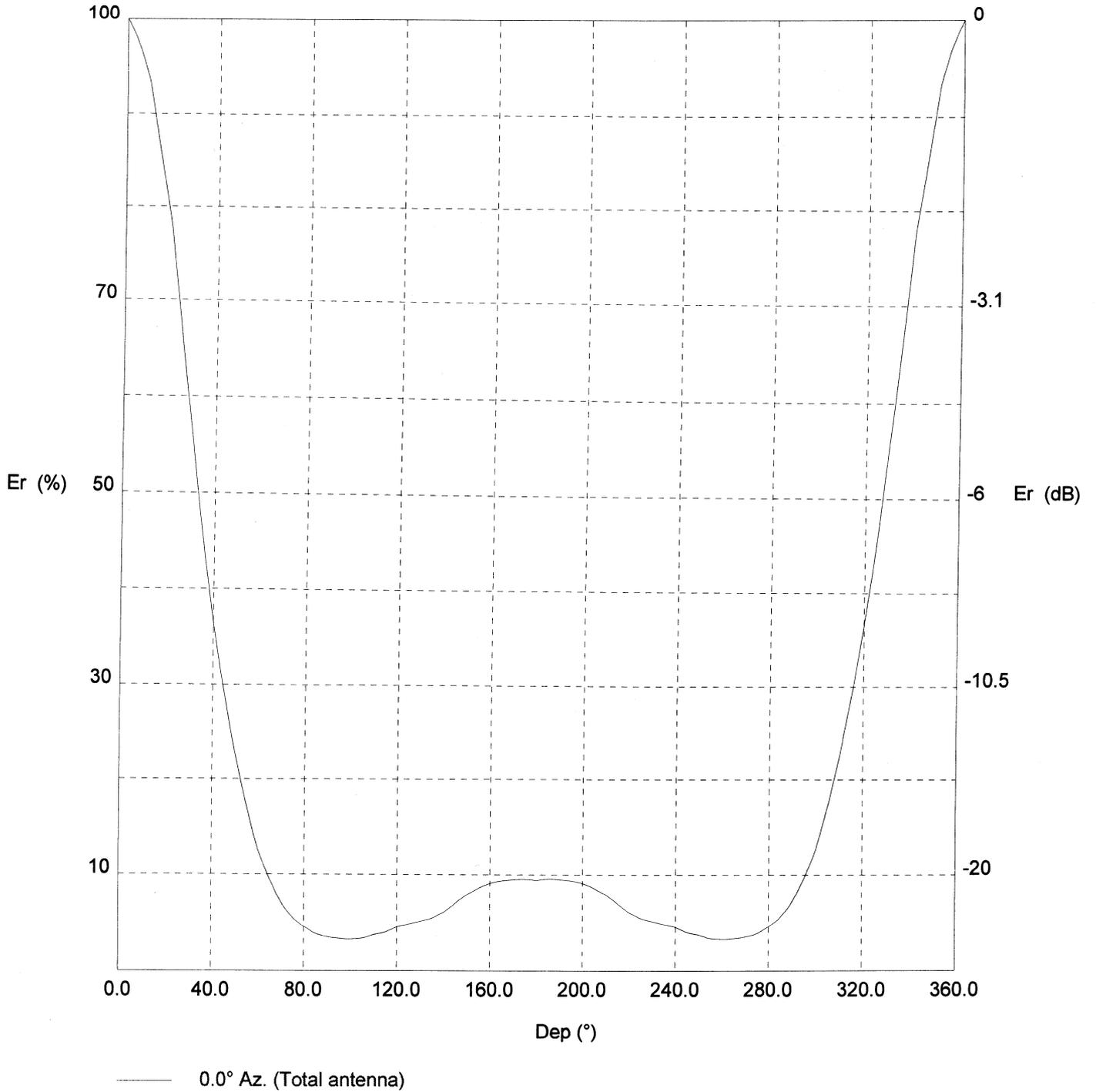
Vertical diagram at an azimuth of 0° degrees

Dep (°)	Er (%)	ERP (KW)	Dep (°)	Er (%)	ERP (KW)	Dep (°)	Er (%)	ERP (KW)
0.0	100.0	8.73	120.0	4.5	0.02	240.0	4.5	0.02
2.0	99.1	8.57	122.0	4.6	0.02	242.0	4.3	0.02
4.0	98.0	8.38	124.0	4.7	0.02	244.0	4.1	0.01
6.0	96.6	8.15	126.0	4.9	0.02	246.0	3.9	0.01
8.0	95.1	7.89	128.0	5.0	0.02	248.0	3.8	0.01
10.0	93.3	7.60	130.0	5.1	0.02	250.0	3.7	0.01
12.0	90.3	7.11	132.0	5.3	0.02	252.0	3.6	0.01
14.0	87.1	6.62	134.0	5.4	0.03	254.0	3.4	0.01
16.0	83.9	6.15	136.0	5.6	0.03	256.0	3.3	0.01
18.0	80.9	5.71	138.0	5.8	0.03	258.0	3.3	0.01
20.0	77.7	5.28	140.0	6.1	0.03	260.0	3.3	0.01
22.0	73.1	4.67	142.0	6.5	0.04	262.0	3.3	0.01
24.0	68.6	4.10	144.0	6.8	0.04	264.0	3.3	0.01
26.0	64.2	3.60	146.0	7.2	0.05	266.0	3.4	0.01
28.0	60.0	3.15	148.0	7.6	0.05	268.0	3.4	0.01
30.0	56.0	2.73	150.0	7.9	0.05	270.0	3.5	0.01
32.0	51.7	2.33	152.0	8.2	0.06	272.0	3.6	0.01
34.0	47.5	1.97	154.0	8.4	0.06	274.0	3.8	0.01
36.0	43.6	1.66	156.0	8.7	0.07	276.0	4.0	0.01
38.0	40.0	1.40	158.0	8.9	0.07	278.0	4.2	0.02
40.0	36.5	1.17	160.0	9.1	0.07	280.0	4.6	0.02
42.0	33.5	0.98	162.0	9.2	0.07	282.0	4.9	0.02
44.0	30.5	0.81	164.0	9.3	0.08	284.0	5.3	0.02
46.0	27.8	0.67	166.0	9.4	0.08	286.0	5.9	0.03
48.0	25.1	0.55	168.0	9.5	0.08	288.0	6.5	0.04
50.0	22.7	0.45	170.0	9.5	0.08	290.0	7.2	0.05
52.0	20.3	0.36	172.0	9.5	0.08	292.0	8.1	0.06
54.0	18.2	0.29	174.0	9.5	0.08	294.0	9.1	0.07
56.0	16.2	0.23	176.0	9.5	0.08	296.0	10.1	0.09
58.0	14.3	0.18	178.0	9.5	0.08	298.0	11.3	0.11
60.0	12.6	0.14	180.0	9.4	0.08	300.0	12.6	0.14
62.0	11.3	0.11	182.0	9.5	0.08	302.0	14.3	0.18
64.0	10.1	0.09	184.0	9.5	0.08	304.0	16.2	0.23
66.0	9.1	0.07	186.0	9.6	0.08	306.0	18.2	0.29
68.0	8.1	0.06	188.0	9.5	0.08	308.0	20.3	0.36
70.0	7.2	0.05	190.0	9.5	0.08	310.0	22.7	0.45
72.0	6.5	0.04	192.0	9.5	0.08	312.0	25.1	0.55
74.0	5.9	0.03	194.0	9.4	0.08	314.0	27.8	0.67
76.0	5.3	0.02	196.0	9.3	0.08	316.0	30.5	0.81
78.0	4.9	0.02	198.0	9.2	0.07	318.0	33.5	0.98
80.0	4.6	0.02	200.0	9.1	0.07	320.0	36.5	1.17
82.0	4.2	0.02	202.0	8.9	0.07	322.0	40.0	1.40
84.0	4.0	0.01	204.0	8.7	0.07	324.0	43.6	1.66
86.0	3.8	0.01	206.0	8.4	0.06	326.0	47.5	1.97
88.0	3.6	0.01	208.0	8.2	0.06	328.0	51.7	2.33
90.0	3.5	0.01	210.0	7.9	0.05	330.0	56.0	2.73
92.0	3.4	0.01	212.0	7.6	0.05	332.0	60.0	3.15
94.0	3.4	0.01	214.0	7.2	0.05	334.0	64.2	3.60
96.0	3.3	0.01	216.0	6.8	0.04	336.0	68.6	4.10
98.0	3.3	0.01	218.0	6.5	0.04	338.0	73.1	4.67
100.0	3.3	0.01	220.0	6.1	0.03	340.0	77.7	5.28
102.0	3.3	0.01	222.0	5.8	0.03	342.0	80.9	5.71
104.0	3.3	0.01	224.0	5.6	0.03	344.0	83.9	6.15
106.0	3.4	0.01	226.0	5.4	0.03	346.0	87.1	6.62
108.0	3.6	0.01	228.0	5.3	0.02	348.0	90.3	7.11
110.0	3.7	0.01	230.0	5.1	0.02	350.0	93.3	7.60
112.0	3.8	0.01	232.0	5.0	0.02	352.0	95.1	7.89
114.0	3.9	0.01	234.0	4.9	0.02	354.0	96.6	8.15
116.0	4.1	0.01	236.0	4.7	0.02	356.0	98.0	8.38
118.0	4.3	0.02	238.0	4.6	0.02	358.0	99.1	8.57

TX station: TV Mondiale  
Frequency: 100.00 MHz

Site name: Monte Alto

### Vertical diagram



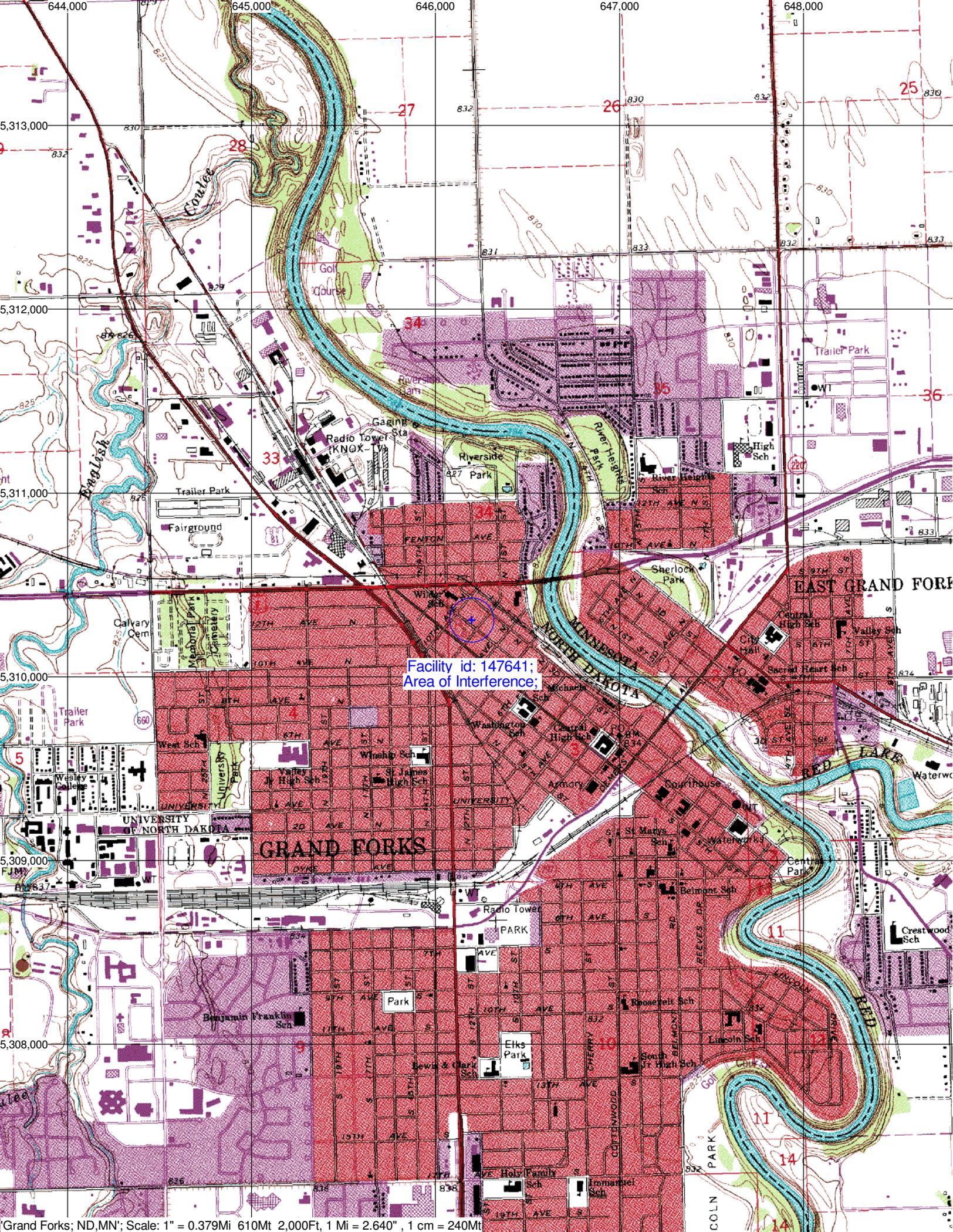
**Adjacent Channel Study  
For Station K239BG, Facility\_id: 147641**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1184649	147645	BLFT	20070507AAG	K237ER	EDUCATIONAL MEDIA FOUNDATION	D	GRAND FORKS	ND	LIC	0.25	315	237	2	3.4	1.4918
81834	9657	BLH	19850913KA	KQHT	CITICASTERS LICENSES, INC.	C1	CROOKSTON	MN	LIC	100	384	241	2	18	1.4918
640281	147596	BNPFT	20030317FVO	NEW	EDGEWATER BROADCASTING, INC.	D	THIEF RIVER FALLS	MN	APP	0.17	446.9	237	2	64.1	0
1266343	37001	BLH	20080922AEJ	KBVB	RADIO FARGO-MOORHEAD, INC.	C1	BARNESVILLE	MN	LIC	100	393.8	236	3	125.4	0
1176632	37001	BXLH	20070315AAB	KBVB	RADIO FARGO-MOORHEAD, INC.	C1	BARNESVILLE	MN	LIC	15	351.2	236	3	125.4	0
1093944	68627	BLH	20051026ABV	KYNU	TWO RIVERS BROADCASTING, INC.	C1	JAMESTOWN	ND	LIC	100	640	238	1	145.7	0

**Intermediate Frequencies (53 and 54 channels difference):**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
647793	154573	BNPFT	20030317ILZ	NEW	RADIO ASSIST MINISTRY, INC.	D	THIEF RIVER FALLS	MN	APP	0.115	484.4	293	54	67.2	57.2
1205704	54334	BLH	20070924AVP	KRJB	R&J BROADCASTING, INC.	C1	ADA	MN	LIC	100	411.2	293	54	79.3	57.3



Facility id: 147641;  
Area of Interference;



Imagery Date: 11/13/2002

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47°55'52.55" N 97°02'36.03" W elev 253 m

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Eye alt 1.32 km