

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 150768

Channel 284

### **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 $\mu$  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 within the zone of 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 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>
649663	BNPFT20030317JJ J	NEW	62.4	62.4
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>62.4</b>

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 **62.4 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **102.4 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **209.5 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"). Hence, 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.

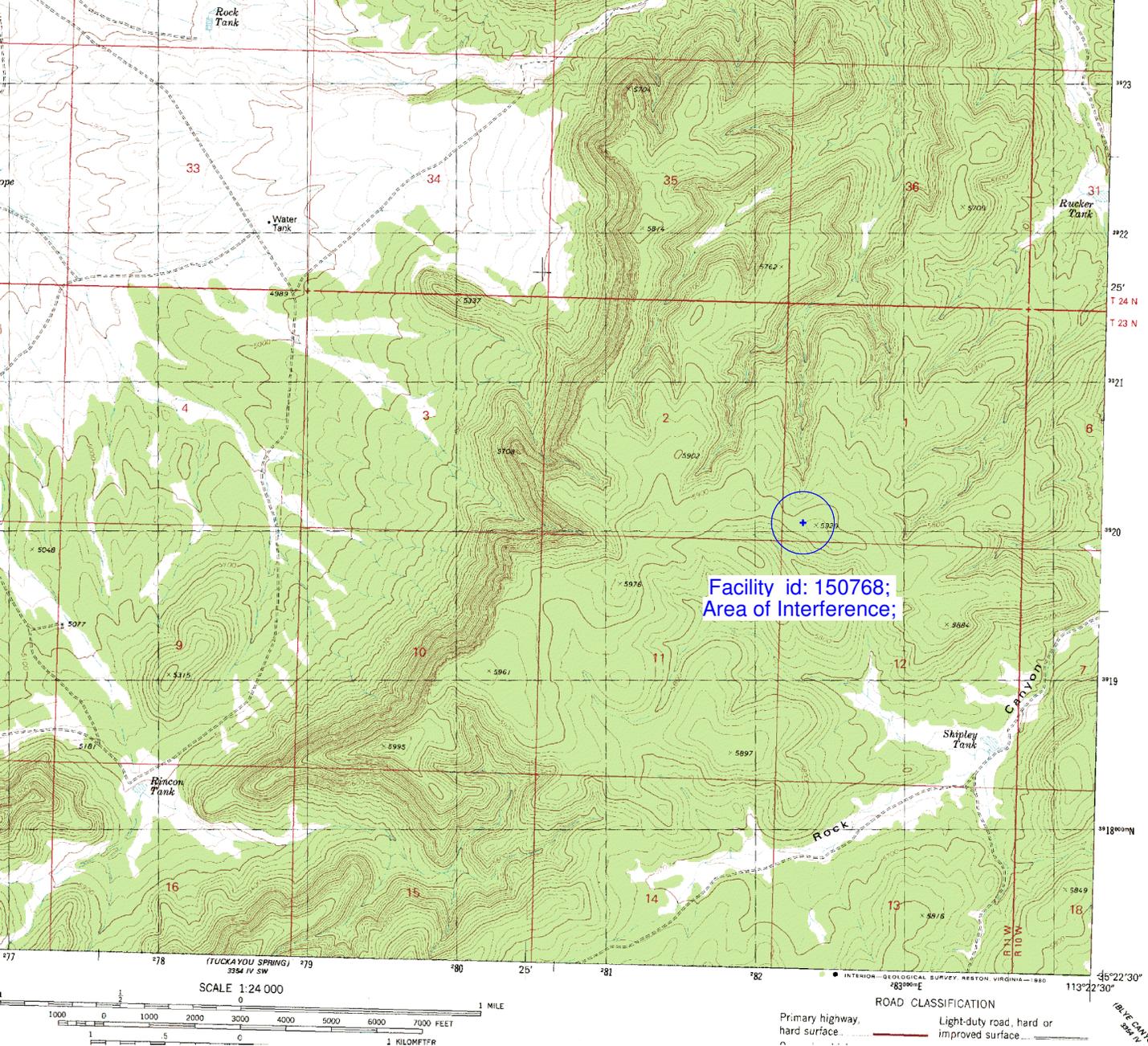
**Note: There are no occupied buildings within the zone of interference so a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.**

**Antenna Manufacturer:** NIC  
**Antenna Model:** BKG77  
**CORAGL:** 10 m  
**Maximum ERP:** 0.0155 kW  
**Interfering Contour:** 102.4 dB $\mu$   
**Max Int. Contour Distance:** 209.5 m

**Adjacent Channel Study  
For Station NEW, Facility\_id: 150768**

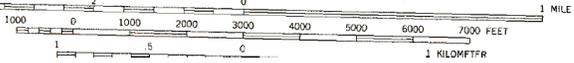
**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
1496405	190381	BSFH-20120112AGF	NEW	JER LICENSES, LLC	C3	PEACH SPRINGS	AZ	APP	0	0	281	3	18.6	0.0925
649663	156382	BNPFT-20030317JJJ	NEW	DONALD F. HENDREN	D	PEACH SPRINGS	AZ	APP	0.25	2304	287	3	32.7	0.0925
1547642	152102	BNPFT-20130326AHI	K283BZ	DONALD F. HENDREN	D	PEACH SPRINGS	AZ	CP	0.185	2357	283	1	54.6	0
1196118	142756	BLFT-20070723ABJ	K284BE	ROCKWELL EDUCATION FOUNDATION	D	DOLAN SPRINGS	AZ	LIC	0.01	957	284	0	87.7	0
1555655	142756	BPFT-20130520AAH	K284BE	ROCKWELL EDUCATION FOUNDATION	D	DOLAN SPRINGS	AZ	APP	0.25	820	287	3	98.3	0
637500	145014	BNPFT-20030317GPG	NEW	DONALD F. HENDREN	D	PRESCOTT	AZ	APP	0.05	3334	287	3	110.1	0
1265795	178649	BNPH-20080915AEP	NEW	ROCKET RADIO CORPORATION	C2	WILLIAMS	AZ	APP	50	2100	287	3	111.4	0
650087	156794	BNPFT-20030317JPV	NEW	DONALD F. HENDREN	D	LAKE HAVASU CIT	AZ	APP	0.07	3050	287	3	119.2	0
1205150	39562	BLH-20070917ADR	KZUL-FM	MAD DOG WIRELESS, INC.	C3	LAKE HAVASU CIT	AZ	LIC	0.23	1441	283	1	119.2	0
1234654	164263	BLH-20080219AYE	KVAL	SMOKE AND MIRRORS, LLC	A	CAL-NEV-ARI	NV	LIC	0.1	1532	285	1	123.8	0
1483448	164263	BMPH-20111227AAB	KVAL	SMOKE AND MIRRORS, LLC	C2	CAL-NEV-ARI	NV	CP MOD	1.35	1536	285	1	123.8	0
1492846	52818	BMLH-20120321AES	KAJM	SIERRA H BROADCASTING, INC.	C	CAMP VERDE	AZ	LIC	40	2323	282	2	161.6	0
1025885	63769	BLH-20041115ACG	KJUL	SUMMIT AMERICAN, INC.	C1	MOAPA VALLEY	NV	LIC	100	775	284	0	174.3	0
1409072	63769	BPH-20101126AAG	KJUL	SUMMIT AMERICAN, INC.	C0	MOAPA VALLEY	NV	CP	100	1106	284	0	178.3	0
235838	19062	BLH-19961122KB	KFRH	SILVER STATE BROADCASTING LLC	C	NORTH LAS VEGAS	NV	LIC	24.5	2593	282	2	200.2	0



Facility id: 150768;  
Area of Interference;

SCALE 1:24 000



ROAD CLASSIFICATION

Primary highway, hard surface ..... Light-duty road, hard or improved surface .....

