

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 148915

Channel 285

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.

Note: The only structures within the zone of predicted information are unoccupied communications buildings 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
1415879	BLH20110209ADG	KMXY	73.1	73
202856	BLH19940928KB	KZKS	148.9	138.8
266965	BLFTB19980514TE	KZKS-FM1	62.9	62.9
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				62.9

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 **62.9 dBμ**, this makes the proposed translator's worst-case interfering contour **102.9 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **142.1 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: The only structures within the zone of predicted information are unoccupied communications buildings 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: FMV
CORAGL: 20 m
Maximum ERP: 0.008 kW
Interfering Contour: 102.9 dBμ
Max Int. Contour Distance: 142.1 m

Adjacent Channel Study
For Station NEW, Facility_id: 148915

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
202856	71959	BLH-19940928KB	KZKS	WESTERN SLOPE COMMUNICATIONS, L.L.C.	C	RIFLE	CO	LIC	60	2690	287	2	0.1	0.0303
266965	71957	BLFTB-19980514TE	KZKS-FM1	WESTERN SLOPE COMMUNICATIONS, L.L.C.	D	GRAND JUNCTION	CO	LIC	20	2150	287	2	66.9	0.0303
1415879	5550	BLH-20110209ADG	KMXV	TOWNSQUARE MEDIA GRAND JUNCTION LICENSE,	C0	GRAND JUNCTION	CO	LIC	100	2245	282	3	67.1	0.0303
217524	71961	BLFTB-19951204TB	KZKS-FM2	WESTERN SLOPE COMMUNICATIONS, L.L.C	D	CARBONDALE	CO	LIC	0.06	3248	287	2	64.5	0
627689	138156	BNPFT-20030311AFT	NEW	PITKIN COUNTY TRANSLATOR DEPARTMENT	D	CARBONDALE	CO	APP	0.01	3239	282	3	64.8	0
1177267	138500	BLFT-20070319AAP	K284AP	KBDX L.L.C.	D	GRAND JUNCTION	CO	LIC	0.01	2228	284	1	66.8	0
1543650	138500	BPFT-20130205AAD	K284AP	KBDX L.L.C.	D	GRAND JUNCTION	CO	CP	0.25	2211	284	1	66.9	0
534032	71958	BLFTB-20000918AKW	KZKS-FM3	WESTERN SLOPE COMMUNICATIONS, L.L.C.	D	GLENWOOD SPRING	CO	LIC	0.25	2219	287	2	71.2	0
1071068	138109	BLFT-20050705AAX	K288FV	PITKIN COUNTY TRANSLATOR DEPARTMENT	D	OLD SNOWMASS	CO	LIC	0.005	2695	288	3	102.5	0
647603	154383	BNPFT-20030317BQR	NEW	EDUCATIONAL COMMUNICATIONS OF COLORADO S	D	ASPEN	CO	APP	0.011	2877	282	3	113.8	0
1246385	57324	BLH-20080519AAS	KRYD	ROCKY III INVESTMENTS, INC.	C1	NORWOOD	CO	LIC	23.62	3074	285	0	124.3	0
704483	16269	BMLH-20031119AII	KKVM	VAIL RADIO PARTNERS, LLC	C1	VAIL	CO	LIC	95	3015	284	1	146.1	0

