

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 153553

Channel 289

### **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: The only structure within the zone of predicted interference is an abandoned concrete corn silage silo. There are no major roads within the zone 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1408039	BLFT20101117BHH	K291BP	68	68
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>68</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 **68 dBμ**, this makes the proposed translator's worst-case interfering contour **108 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **88.3 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.

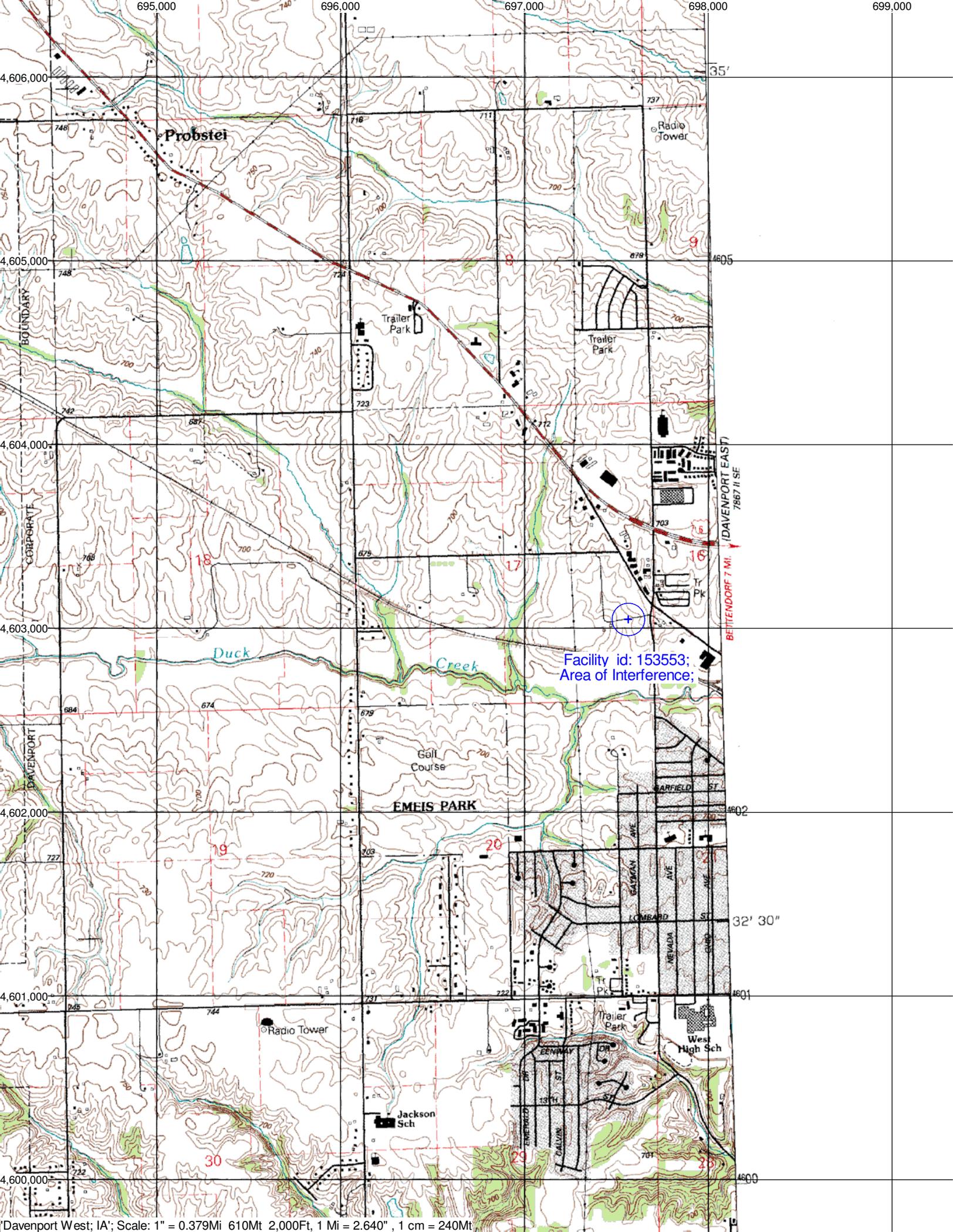
**Note: The only structure within the zone of predicted interference is an abandoned concrete corn silage silo. There are no major roads within the zone so a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.**

**Antenna Manufacturer:** WRL  
**Antenna Model:** FMPV1  
**CORAGL:** 4 m  
**Maximum ERP:** 0.01 kW  
**Interfering Contour:** 108 dBμ  
**Max Int. Contour Distance:** 88.3 m

**Adjacent Channel Study  
For Station K289BI, Facility\_id: 153553**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1408039	62091	BLFT	20101117BHH	K291BP	ST. AMBROSE COLLEGE	D	BETTENDORF	IA	LIC	0.25	242	291	2	4.4	0.0597
628585	138367	BNPFT	20030314BWV	NEW	AMFM RADIO LICENSES, L.L.C.	D	PORT CARGAILL	MN	APP	0.25	215	292	3	40.9	0
1084093	165358	BSFH	20050812ASC	NEW	CUMULUS LICENSING LLC	A	ERIE	IL	APP	0	0	288	1	42.2	0
1113331	166073	BSFH	20050812AWF	NEW	ACE RADIO CORPORATION	A	ERIE	IL	APP	0	0	288	1	47.7	0
1424412	166073	BNPH	20060309ADE	NEW	ACE RADIO CORPORATION	A	ERIE	IL	APP	6	288	288	1	49.3	0
1193148	153880	BLFT	20070629AAA	K290BH	HORIZON CHRISTIAN FELLOWSHIP	D	SAVANNA	IL	LIC	0.205	294	290	1	63	0
1423674	153880	BPFT	20110414AAC	K290BH	HORIZON CHRISTIAN FELLOWSHIP	D	SAVANNA	IL	APP	0.01	188	290	1	65.8	0
1299003	153604	BLFT	20090306AAB	K292FZ	EXTREME GRACE MEDIA, INC.	D	MOUNT VERNON	IA	LIC	0.09	329	292	3	66.2	0
646951	153733	BNPFT	20030317HYC	NEW	RADIO ASSIST MINISTRY, INC.	D	GALVA	IL	APP	0.013	333.9	291	2	68.6	0
602685	76984	BLH	20010413AAG	WKAY	GALESBURG BROADCASTING COMPANY	A	KNOXVILLE	IL	LIC	3.7	354	287	2	72.3	0
646961	153743	BNPFT	20030317HYJ	NEW	RADIO ASSIST MINISTRY, INC.	D	GALESBURG	IL	APP	0.01	378.2	291	2	72.4	0
1284069	171007	BNPH	20070502AAU	NEW	KM COMMUNICATIONS, INC.	A	ABINGDON	IL	CP	2.8	368	291	2	75.3	0
1241940	12717	BLH	20080404ADR	KLYV	CUMULUS LICENSING LLC	C2	DUBUQUE	IA	LIC	50	359	287	2	105.4	0



Probstei

Radio Tower

Trailer Park

Trailer Park

Duck Creek

Golf Course

EMEIS PARK

Radio Tower

Jackson Sch

Trailer Park

West High Sch

Facility id: 153553;  
Area of Interference;

BETTENDORF 7 MI. DAVENPORT EAST  
7867 II SE



40 yds

