

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 152552

Channel 264

### **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.

Since the proposed translator is within 320 km of the Canadian border, 47 C.F.R. § 74.1235(d) has been taken into account and this applicant certifies that in no direction does the 34 dB $\mu$  F(50,10) extend beyond 60 km, and this application is therefore in full compliance with 47 C.F.R. § 74.1235(d)(3), which states that "the distance to the 34 dB $\mu$  interfering contour may not exceed 60 km in any direction," and hence complies with 47 C.F.R. § 74.1204(h).

**Note: There are no major roads or occupied buildings 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 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>
282148	BMLH19990219KD	KEYF-FM	77.1	77.1
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>77.1</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 **77.1 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **117.1 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **31 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 major roads or occupied buildings 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.**

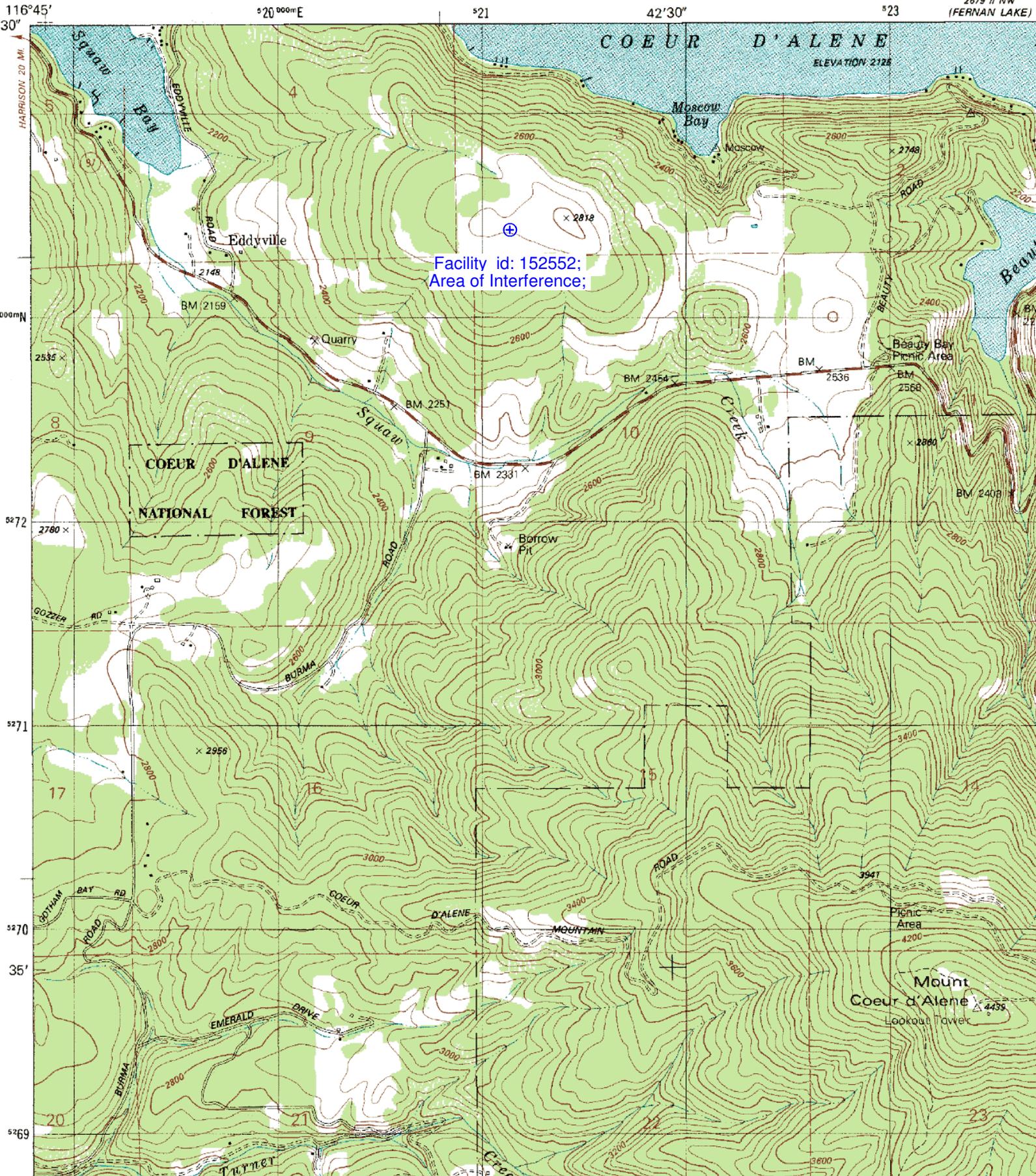
**Antenna Manufacturer:** SWR  
**Antenna Model:** FM1  
**CORAGL:** 63 m  
**Maximum ERP:** 0.01 kW  
**Interfering Contour:** 117.1 dB $\mu$   
**Max Int. Contour Distance:** 31 m

**Adjacent Channel Study**  
**For Station NEW, Facility\_id: 152552**

**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
282148	53147	BMLH-19990219KD	KEYF-FM	MAPLETON LICENSE OF SPOKANE, LLC	C	CHENEY	WA	LIC	100	1196	266	2	43.4	0.0597
1550737	144996	BNPFT-20030317AGY	NEW	SPOKANE PUBLIC RADIO, INC.	D	COEUR D'ALENE	ID	APP	0.05	888	262	2	9.4	0
264130	81398	BLFT-19980323TD	K262AG	SPOKANE RADIO, INC.	D	SPOKANE, ETC.	WA	LIC	0.003	853	262	2	44.6	0
1551077	155769	BNPFT-20030317MJJ	NEW	NORTHWEST COMMUNITY RADIO PROJECT	D	DEER PARK	WA	APP	0.03	741	262	2	74.5	0
1246906	164223	BLH-20080522ABE	KQZB	PACIFIC EMPIRE RADIO CORP	C3	TROY	ID	LIC	0.9	1389	263	1	90.7	0

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY



Facility id: 152552;  
Area of Interference;

