

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 151116

Channel 232

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.

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 μ 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
181147	BLH19930127KB	KINT-FM	99.6	99.2
202347	BLH19940909KG	KYSE	99.1	98.6
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				98.6

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 **98.6 dB μ** , this makes the proposed translator's worst-case interfering contour **138.6 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **3.7 m** from the transmit antenna.

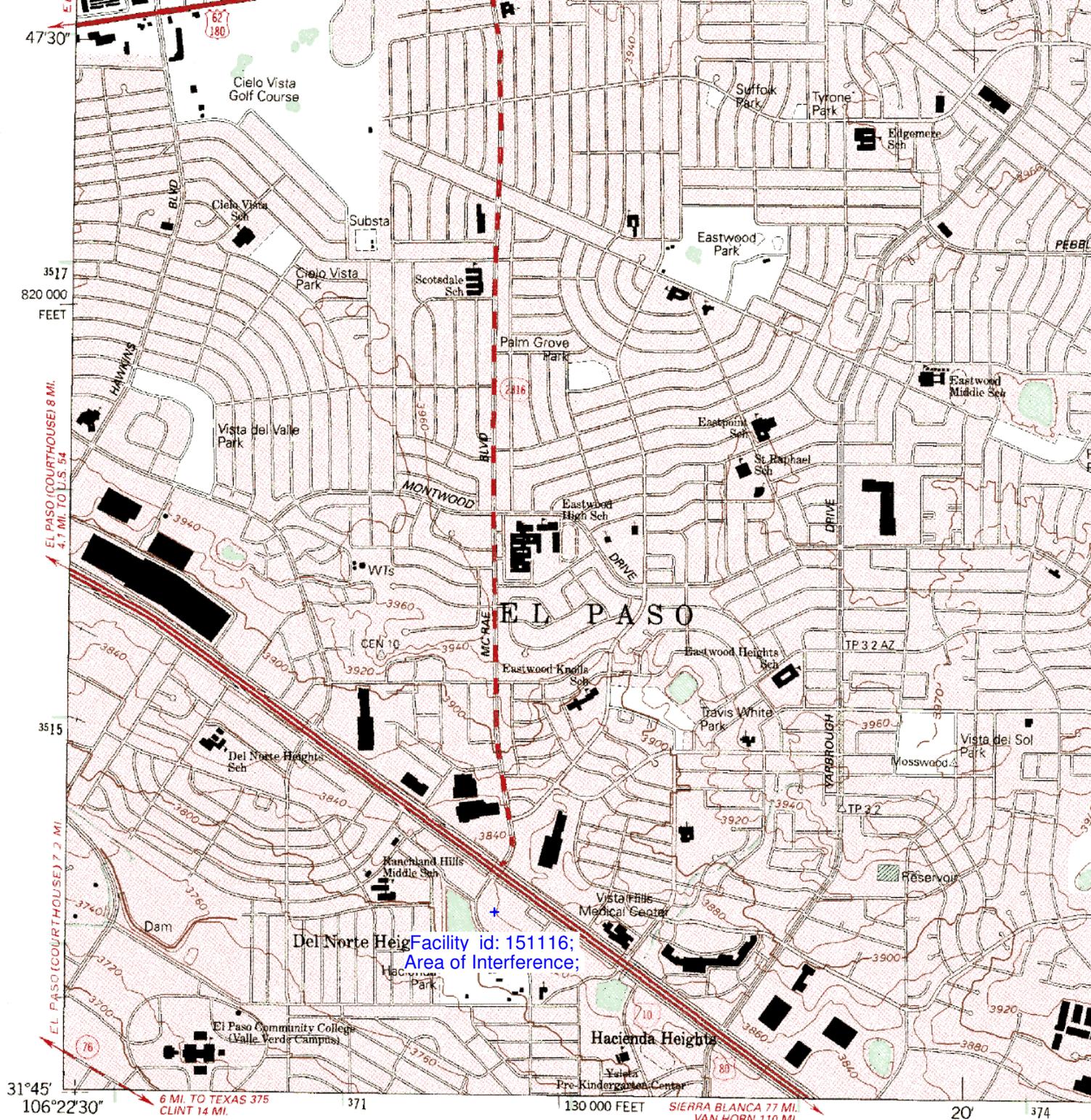
The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). However, since the area of interference extends a maximum of **3.7 m** from the transmit antenna and the transmit antenna is **30 m** above tower ground level (TGL), the area of interference will be at least **26.3 m** above TGL 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. 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.

Antenna Manufacturer: SWR
Antenna Model: FM1
CORAGL: 30 m
Maximum ERP: 0.02 kW
Interfering Contour: 138.6 dB μ
Max Int. Contour Distance: 3.7 m
Min Ground Clearance: 26.3 m

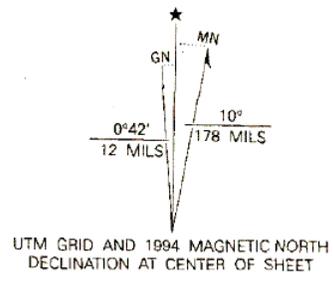
Adjacent Channel Study
For Station NEW, Facility_id: 151116

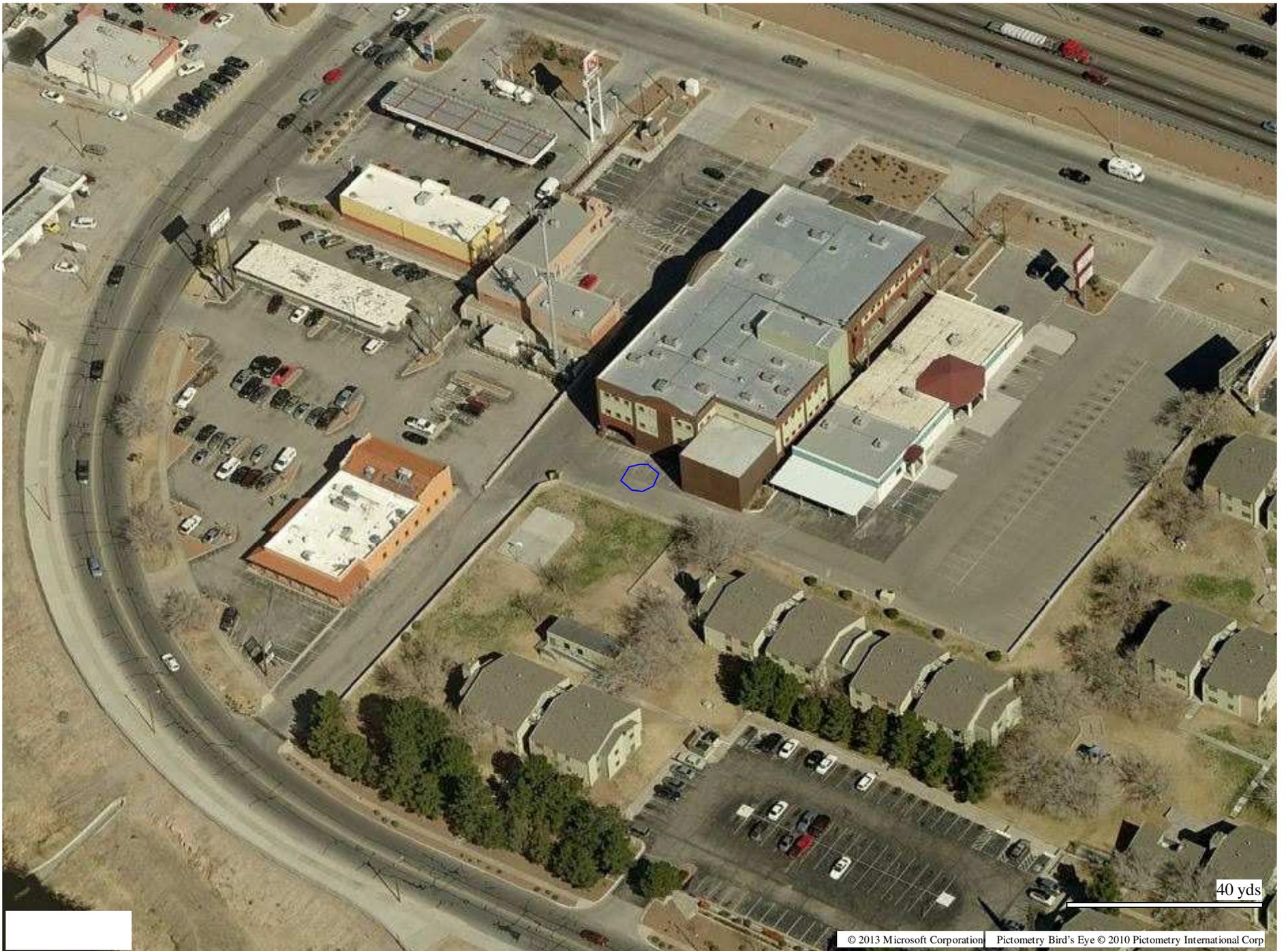
Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
202347	39612	BLH-19940909KG	KYSE	ENTRAVISION HOLDINGS, LLC	C	EL PASO	TX	LIC	97	1578	234	2	12.5	0.3091
181147	51709	BLH-19930127KB	KINT-FM	ENTRAVISION HOLDINGS, LLC	C	EL PASO	TX	LIC	96	1659	230	2	12.8	0.3091



Produced by the United States Geological Survey
 Control by USGS and NOS/NOAA
 Compiled from aerial photographs taken 1954. Revised from aerial photographs taken 1991 and other sources. Field checked 1992
 Map edited 1994
 North American Datum of 1927 (NAD 27). Projection and 10 000-foot ticks: Texas Coordinate System, central zone (Lambert Conformal Conic)
 Blue 1000-meter Universal Transverse Mercator ticks, zone 13
 North American Datum of 1983 (NAD 83) is shown by dashed corner ticks. The values of the shift between NAD 27 and NAD 83 for 7.5-minute intersections are obtainable from National Geodetic Survey NADCON software
 Red tint indicates areas in which only landmark buildings are shown
 Fine red dashed lines indicate selected fence and field lines where generally visible on aerial photographs. This information is unchecked





40 yds