

Non-Interference Compliance

Regarding Facility id 151372

Channel 252

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 dBμ 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 structures within the zone of interference. The objects appearing in the aerial photo are truck beds, boats and various pieces of equipment. The covered sheds within the zone are equipment and parts' storage structures. The only occupied building in the area is the office which is the building (north of the grassy area) 105m northwest of the proposed transmit site and is entirely outside 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 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
265644	BLH19980408KB	KMGV	61.9	61.9
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				61.9

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 **61.9 dBμ**, this makes the proposed translator's worst-case interfering contour **101.9 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **97.6 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").

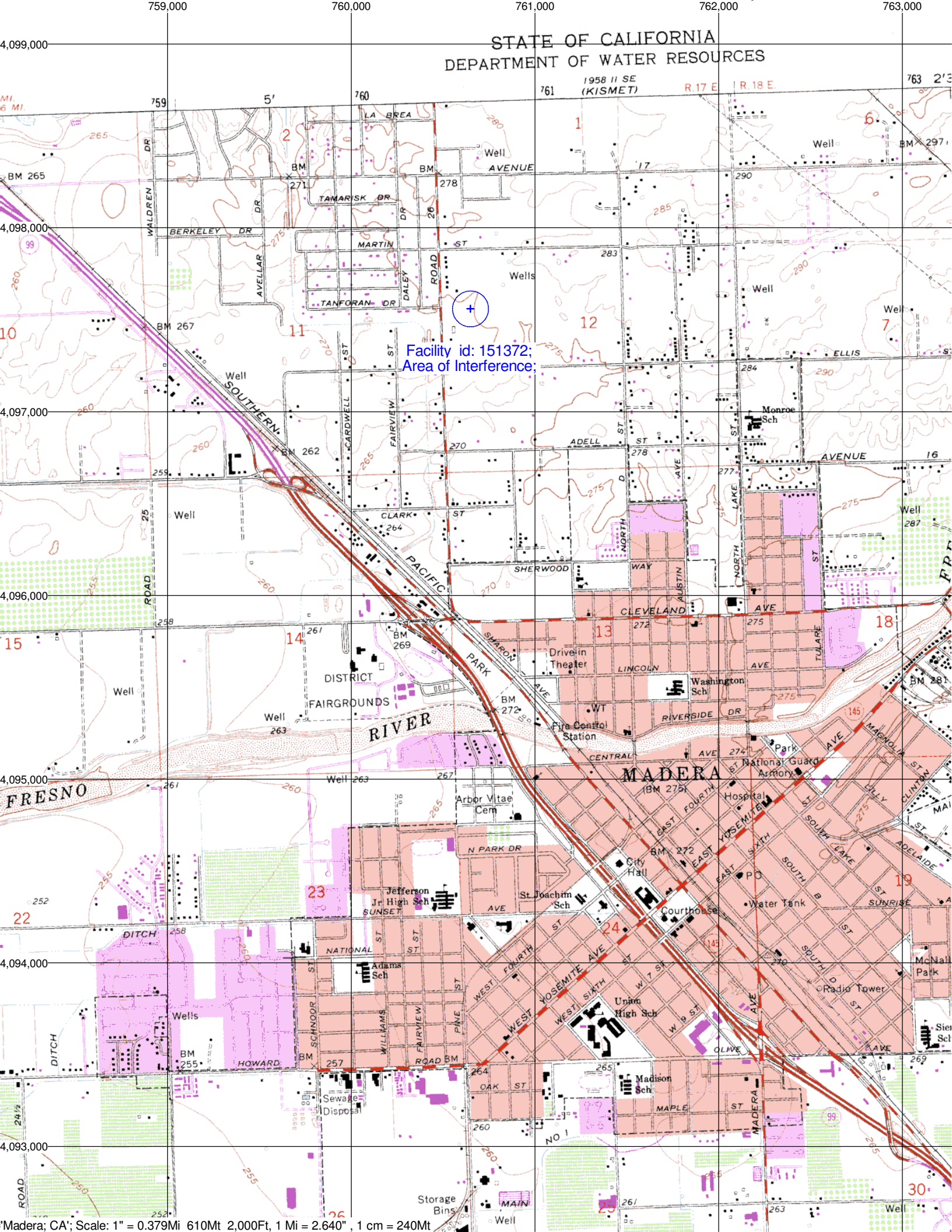
Note: There are no occupied structures within the zone of interference. The objects appearing in the aerial photo are truck beds, boats and various pieces of equipment. The covered sheds within the zone are equipment and parts' storage structures. The only occupied building in the area is the office which is the building (north of the grassy area) 105m northwest of the proposed transmit site and is entirely outside 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:	WRL
Antenna Model:	FMPV1
CORAGL:	4 m
Maximum ERP:	0.003 kW
Interfering Contour:	101.9 dBμ
Max Int. Contour Distance:	97.6 m

Adjacent Channel Study **For Station K252DO, Facility_id: 151372**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1404473	86866	BMPH	20101027ACV	KZLA	HURON BROADCASTING, LLC	B1	RIVERDALE	CA	APP	25	147	252	0	50	0.342
1143243	18409	BXLH	20060802AUF	KMGV	PEAK BROADCASTING OF FRESNO LICENSES,	B	FRESNO	CA	LIC	1	1424	250	2	57.6	0.0713
265644	18409	BLH	19980408KB	KMGV	PEAK BROADCASTING OF FRESNO LICENSES,	B	FRESNO	CA	LIC	2.1	1439	250	2	57.6	0.0713
644391	151316	BNPFT	20030317EVN	NEW	RADIO ASSIST MINISTRY, INC.	D	FIREBAUGH	CA	APP	0.12	83	252	0	37.2	0
644226	151151	BNPFT	20030317FYG	NEW	ROBERT J. CONNELLY, JR.	D	CALWA	CA	APP	0.25	127	252	0	48.1	0
648837	155608	BNPFT	20030317EHK	NEW	ROBERT J. CONNELLY, JR.	D	SANGER	CA	APP	0.25	136	253	1	58.4	0
648810	155581	BNPFT	20030317EIT	NEW	ROBERT J. CONNELLY, JR.	D	SANGER	CA	APP	0.25	136	252	0	58.4	0
280026	65374	BLH	19990119KH	KLOQ-FM	MAPLETON LICENSE OF MERCED, LLC	A	WINTON	CA	LIC	6	130	254	2	58.7	0
648759	155535	BNPFT	20030317ERO	NEW	ROBERT J. CONNELLY, JR.	D	SELMA	CA	APP	0.25	127	253	1	60.4	0
648545	155321	BNPFT	20030317EDO	NEW	ROBERT J. CONNELLY, JR.	D	SELMA	CA	APP	0.25	127	252	0	60.4	0
1398423	86866	BPH	20100312ABK	KZLA	HURON BROADCASTING, LLC	A	HURON	CA	CP	6	151	252	0	79.3	0
646036	152826	BNPFT	20030317EHP	NEW	KING CITY COMMUNICATIONS CORPORATION	D	IDRIA	CA	APP	0.25	1606	253	1	85.8	0
72744	54560	BLH	19840924DD	KSOF	CAPSTAR TX LLC	B	DINUBA	CA	LIC	19	1617	255	3	107.8	0
1187469	54560	BXLH	20070606ABO	KSOF	CAPSTAR TX LLC	B	DINUBA	CA	LIC	1	1573	255	3	107.8	0



STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES

1958 II SE
(KISMET)

R.17 E R.18 E

Facility id: 151372;
Area of Interference:

