

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 142711

Channel 222

### **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 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Page 4 includes a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 5 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 6 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 7 of this exhibit is an aerial photo of the vicinity surrounding the proposed translator's tower site.

**Note: The tallest building within the zone of predicted interference is 25ft (64m). This proposal provides 51.4m (168.6ft) ground clearance 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>
1571036	BNPFT20130826AHK	K224EF	87.8	87.8
1654379	BLED20141010ABK	KXRI	95	95

Minimum F(50,50) Contour of Adjacent Station within  
Proposed Translator's Standard Interfering Contour **87.8**

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 **87.8 dBμ**, this makes the proposed translator's worst-case interfering contour **127.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **28.4 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 6 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated on the following page at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free-space calculation that neglects any loss due to reflection, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the tower ground level (TGL) by **51.4 m** 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.

**Note: The tallest building within the zone of predicted interference is 25ft (64m). This proposal provides 51.4m (168.6ft) ground clearance 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:** NIC  
**Antenna Model:** BKG77  
**CORAGL:** 64 m  
**Maximum ERP:** 0.099 kW  
**Interfering Contour:** 127.8 dBμ  
**Max Int. Contour Distance:** 28.4 m  
**Min Ground Clearance:** 51.4 m

Depression Angle Below Horizontal	Antenna Relative Field	ERP (watts)	Distance to Interfering Contour from Antenna (m)	Horizontal Distance of Interfering Contour from Tower (m)	Vertical Clearance of Interfering Contour above TGL (m)
5	.999	98.8	28.4	28.3	61.5
10	.982	95.5	27.9	27.5	59.2
15	.954	90.1	27.1	26.2	57.0
20	.918	83.4	26.1	24.5	55.1
25	.871	75.1	24.8	22.4	53.5
30	.818	66.2	23.3	20.1	52.4
35	.758	56.9	21.6	17.7	51.6
40	.691	47.3	19.6	15.1	51.4
45	.616	37.6	17.5	12.4	51.6
50	.538	28.7	15.3	9.8	52.3
55	.465	21.4	13.2	7.6	53.2
60	.391	15.1	11.1	5.6	54.4
65	.313	9.7	8.9	3.8	55.9
70	.239	5.7	6.8	2.3	57.6
75	.176	3.1	5.0	1.3	59.2
80	.128	1.6	3.6	0.6	60.4
85	.103	1.1	2.9	0.3	61.1
90	.105	1.1	3.0	0.0	61.0
Minimum Clearance above TGL:					<b>51.4 m</b>



BKO77

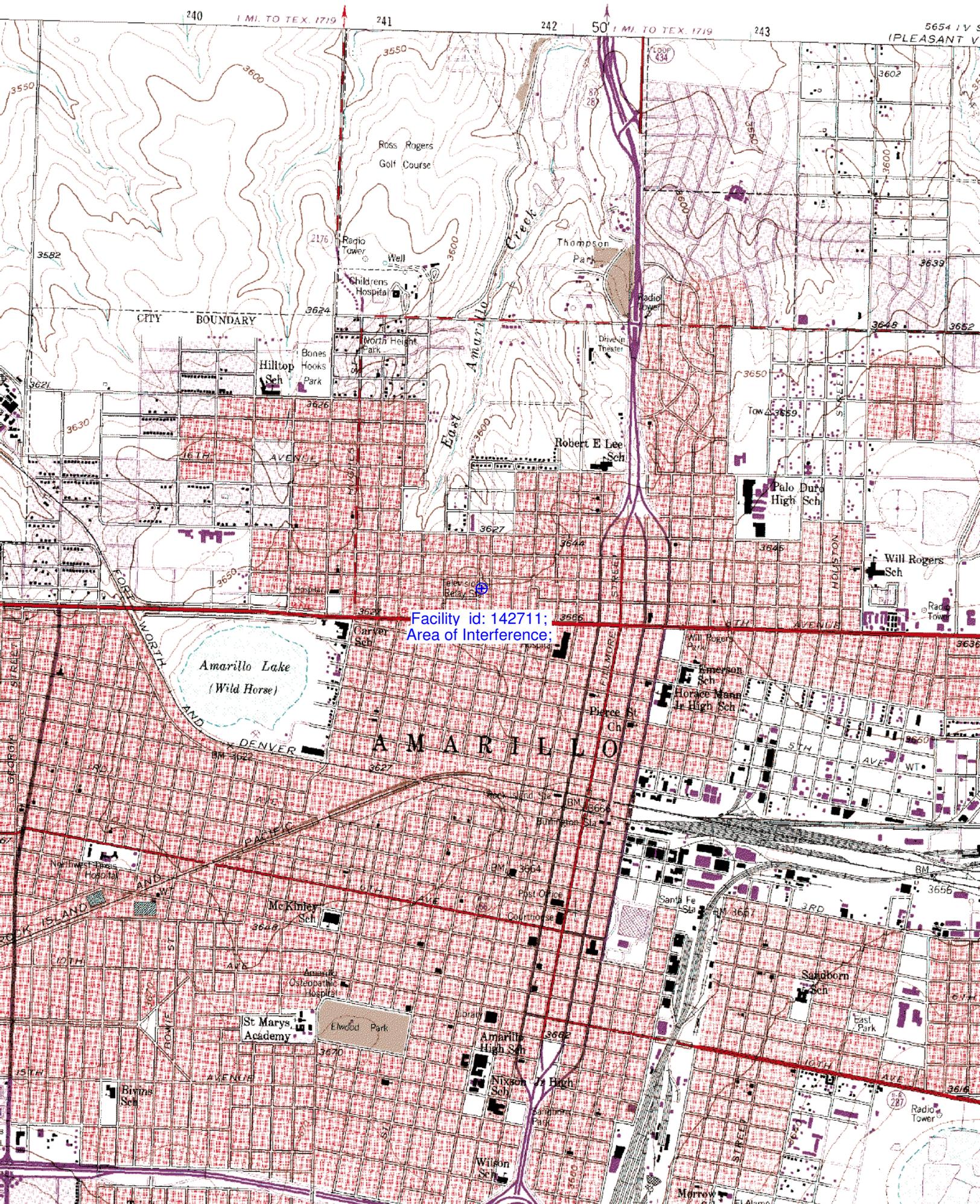
<b>Vertical</b>	-66	0.297	54	0.479	174	0.468
<b>Values</b>	-63	0.345	57	0.436	177	0.479
-180	0.487	-60	0.391	60	0.391	
-177	0.478	-57	0.436	63	0.345	
-174	0.467	-54	0.479	66	0.297	
-171	0.460	-51	0.523	69	0.253	
-168	0.454	-48	0.568	72	0.211	
-165	0.447	-45	0.616	75	0.176	
-162	0.439	-42	0.661	78	0.145	
-159	0.429	-39	0.706	81	0.120	
-156	0.419	-36	0.745	84	0.105	
-153	0.402	-33	0.783	87	0.100	
-150	0.385	-30	0.818	90	0.105	
-147	0.369	-27	0.852	93	0.118	
-144	0.359	-24	0.881	96	0.134	
-141	0.350	-21	0.910	99	0.151	
-138	0.338	-18	0.934	102	0.168	
-135	0.326	-15	0.954	105	0.185	
-132	0.314	-12	0.972	108	0.202	
-129	0.303	-9	0.987	111	0.219	
-126	0.290	-6	0.999	114	0.236	
-123	0.278	-3	0.999	117	0.252	
-120	0.265	0	1.000	120	0.265	
-117	0.251	3	0.999	123	0.278	
-114	0.236	6	0.999	126	0.290	
-111	0.218	9	0.987	129	0.304	
-108	0.202	12	0.972	132	0.314	
-105	0.185	15	0.954	135	0.327	
-102	0.168	18	0.934	138	0.338	
-99	0.151	21	0.910	141	0.350	
-96	0.134	24	0.881	144	0.360	
-93	0.118	27	0.852	147	0.370	
-90	0.105	30	0.818	150	0.386	
-87	0.100	33	0.783	153	0.403	
-84	0.105	36	0.745	156	0.420	
-81	0.120	39	0.706	159	0.430	
-78	0.145	42	0.661	162	0.440	
-75	0.176	45	0.616	165	0.448	
-72	0.211	48	0.568	168	0.455	
-69	0.253	51	0.523	171	0.461	

Better than SWR

**Adjacent Channel Study  
For Station K222CL, Facility\_id: 142711**

**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1654379	5138	BLED-20141010ABK	KXRI	EDUCATIONAL MEDIA FOUNDAT	C3	AMARILLO	TX	LIC	11	1217	220	2	3.2	0.5908
1571036	142021	BNPFT-20130826AHI	K224EF	GRACE COMMUNITY CHURCH OI	D	AMARILLO, NORT	TX	CP	0.25	1197	224	2	3.7	0.5908
1480095	147619	BLFT-20111214ABB	K219LO	TOP O' TEXAS EDUCATIONAL BF	D	HEREFORD	TX	LIC	0.01	1219	219	3	64.9	0
1201598	143729	BLFT-20070823AGK	K222BE	EDUCATIONAL MEDIA FOUNDAT	D	BORGER	TX	LIC	0.075	1033	222	0	66.1	0
1500464	1608	BLFT-20120517AAI	K219CC	AMERICAN FAMILY ASSOCIATIO	D	DUMAS	TX	LIC	0.14	1166	219	3	69.1	0
1148670	139611	BLFT-20060915APD	K223AU	EDUCATIONAL MEDIA FOUNDAT	D	DUMAS	TX	LIC	0.14	1202	223	1	78.4	0
1660869	176883	BPED-20141120AGW	KBDW	SOLID ROCK FOUNDATION	A	LEFORS	TX	CP	3	1033	219	3	85.3	0
128615	72166	BLFT-19890515TD	K220CP	TOP O' TEXAS EDUCATIONAL BF	D	PAMPA	TX	LIC	0.067	1083	220	2	90.6	0
1306207	94225	BLED-20090406ALS	KTDA	AMERICAN FAMILY ASSOCIATIO	A	DALHART	TX	LIC	0.83	1249	219	3	110.6	0
1563689	65458	BMLED-20130717AA'	KIJN-FM	TOP O' TEXAS EDUCATIONAL BF	C1	FARWELL	TX	LIC	100	1353	222	0	115.9	0



Facility id: 142711;  
Area of Interference:

