

Non-Interference Compliance

Regarding Facility id 158467

Channel 295

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.

Pages 4 through 6 include a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 7 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 8 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 9 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 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
210350	BMLH19950612KB	KLVE	67.1	67.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				67.1

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 **67.1 dBμ**, this makes the proposed translator's worst-case interfering contour **107.1 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **353.2 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 8 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 **10.8 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. 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.

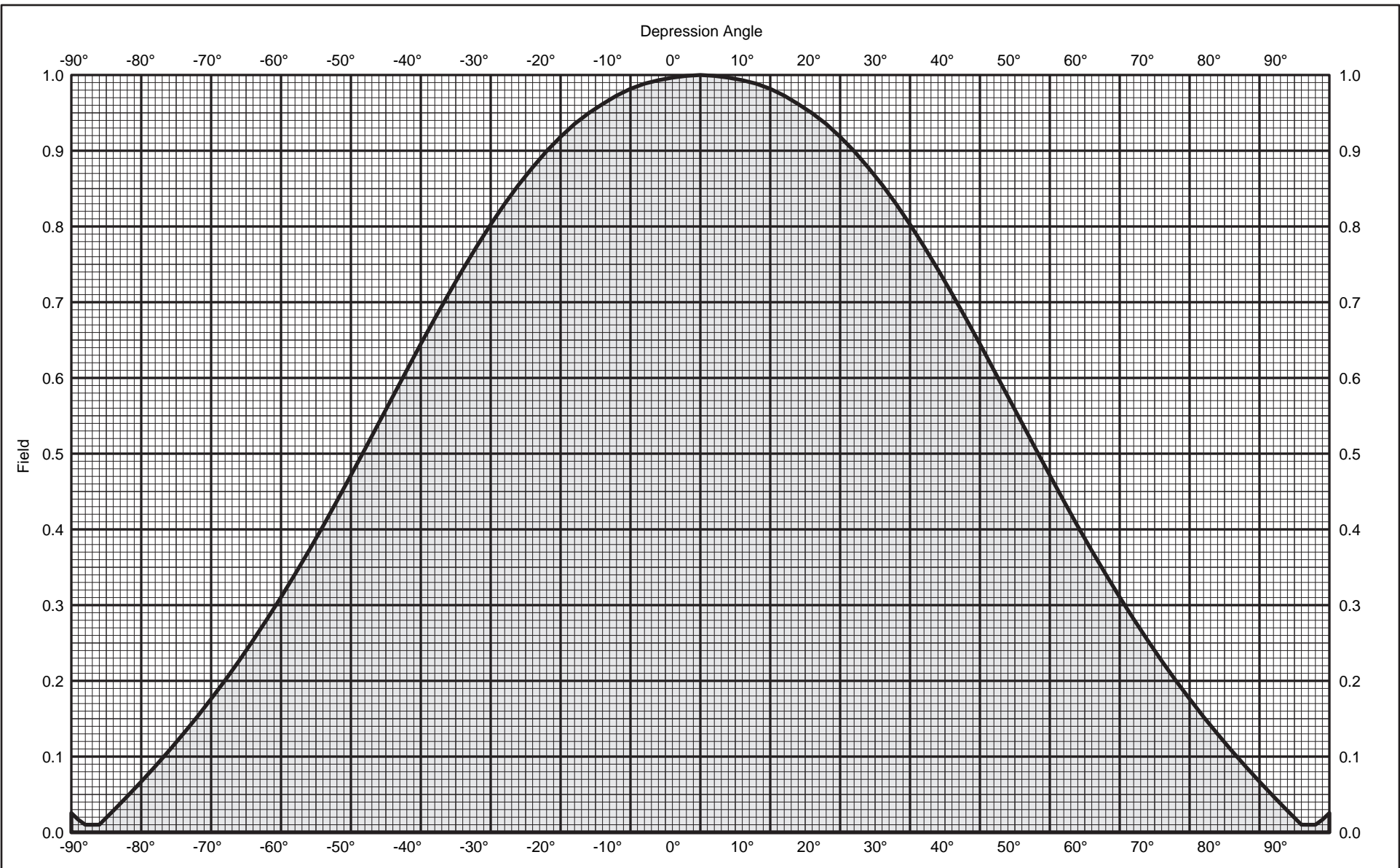
Antenna Manufacturer:	SCA
Antenna Model:	FMV
Antenna Bays:	8
Antenna Bay Spacing:	0.75
CORAGL:	30 m
Maximum ERP:	0.13 kW
Interfering Contour:	107.1 dBμ
Max Int. Contour Distance:	353.2 m
Min Ground Clearance:	10.8 m

The following table shows how the interfering contour ground clearance was calculated.

The formula used to calculate the vertical radiation pattern for the multi-bay antenna array is the exact formula used by the FCC's Office of Engineering and Technology in the FM Model program used to calculate ground-level power density for multi-bay antenna arrays for purposes of compliance with OET65. According to the source code of FM Model, this formula was "derived from Kraus (eqn 4-51 & 5-52), Gailey and Tell, and material from Ben Dawson, Hatfield and Dawson."

- The *Depression Angle* is the angle below horizontal for the radial.
- The *Single-Bay Relative Field* value is the relative field value for the depression angle either provided by the antenna manufacturer or interpolated from the values provided by the manufacturer.
- The *Relative Field Multiplier* is equal to $\text{Sin}(N * S\pi\text{Sin}\phi) / (N * \text{Sin}(S\pi\text{Sin}\phi))$, where N is the number of antenna elements in the array, S is the spacing between elements, π is the ratio of a circle's circumference to its diameter, and ϕ is the Depression Angle.
- The *Relative Field Value for the Array* is the absolute value of the product of the Relative Field Factor and the Single-Bay Relative Field value for that radial.
- The *ERP on the Radial* is the square of the *Relative Field Value for the Array* multiplied by the maximum ERP.
- The *Contour Direct Distance* is found by using the free space equation.
- The *Horizontal and Vertical Contour Distances* are calculated from the *Direct Distance* using trigonometry.
- The *Contour Ground Clearance* is the *Vertical Contour Distance* subtracted from the overall antenna height above the ground.

Depression Angle (degree)	Single-Bay Relative Field	Relative Field Multiplier	Relative Field for Array	ERP on Radial (W)	Contour Direct Distance (m)	Contour Horizontal Distance (m)	Contour Vertical Distance (m)	Contour Ground Clearance (m)
5	0.995	0.6114	0.608	48.1	214.8	214.0	18.7	11.3
10	0.982	-0.0412	0.040	0.2	14.3	14.1	2.5	27.5
15	0.956	-0.2152	0.206	5.5	72.7	70.2	18.8	11.2
20	0.918	0.0282	0.026	0.1	9.2	8.6	3.1	26.9
25	0.867	0.1480	0.128	2.1	45.3	41.1	19.2	10.8
30	0.803	0.0000	0.000	0.0	0.0	0.0	0.0	30.0
35	0.727	-0.1259	0.092	1.1	32.3	26.5	18.5	11.5
40	0.645	-0.0545	0.035	0.2	12.4	9.5	8.0	22.0
45	0.558	0.0867	0.048	0.3	17.1	12.1	12.1	17.9
50	0.472	0.1227	0.058	0.4	20.4	13.1	15.7	14.3
55	0.388	0.0353	0.014	0.0	4.8	2.8	4.0	26.0
60	0.310	-0.0810	0.025	0.1	8.9	4.4	7.7	22.3
65	0.240	-0.1452	0.035	0.2	12.3	5.2	11.2	18.8
70	0.176	-0.1417	0.025	0.1	8.8	3.0	8.3	21.7
75	0.119	-0.0983	0.012	0.0	4.1	1.1	4.0	26.0
80	0.067	-0.0482	0.003	0.0	1.1	0.2	1.1	28.9
85	0.019	-0.0126	0.000	0.0	0.1	0.0	0.1	29.9
90	0.025	0.0000	0.000	0.0	0.0	0.0	0.0	30.0
Min Ground Clearance (m):								10.8



KATHREIN
SCALA DIVISION

Post Office Box 4580 Phone:(541)779-6500
Medford, OR 97501 (USA) Fax:(541)779-3991
<http://www.kathrein-scala.com>

FMV Dipole
FM
Maximum gain: 1.0 dBd
Vertical polarization

Vertical radiation pattern
0 degree electrical downtilt



FMV Dipole

FM

Maximum gain: 1.0 dBd

Vertical polarization

Vertical radiation pattern

0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
-90	0.025	-31.89	-30.89	0.00	-45	0.558	-5.07	-4.07	0.39
-89	0.017	-35.56	-34.56	0.00	-44	0.575	-4.80	-3.80	0.42
-88	0.010	-40.00	-39.00	0.00	-43	0.593	-4.54	-3.54	0.44
-87	0.010	-40.00	-39.00	0.00	-42	0.610	-4.29	-3.29	0.47
-86	0.010	-39.94	-38.94	0.00	-41	0.628	-4.05	-3.05	0.50
-85	0.019	-34.30	-33.30	0.00	-40	0.645	-3.81	-2.81	0.52
-84	0.028	-30.91	-29.91	0.00	-39	0.662	-3.59	-2.59	0.55
-83	0.038	-28.42	-27.42	0.00	-38	0.678	-3.37	-2.37	0.58
-82	0.047	-26.48	-25.48	0.00	-37	0.695	-3.16	-2.16	0.61
-81	0.057	-24.86	-23.86	0.00	-36	0.711	-2.96	-1.96	0.64
-80	0.067	-23.49	-22.49	0.01	-35	0.727	-2.77	-1.77	0.67
-79	0.077	-22.27	-21.27	0.01	-34	0.743	-2.58	-1.58	0.70
-78	0.087	-21.20	-20.20	0.01	-33	0.758	-2.40	-1.40	0.72
-77	0.098	-20.21	-19.21	0.01	-32	0.774	-2.23	-1.23	0.75
-76	0.108	-19.33	-18.33	0.01	-31	0.788	-2.07	-1.07	0.78
-75	0.119	-18.49	-17.49	0.02	-30	0.803	-1.91	-0.91	0.81
-74	0.130	-17.73	-16.73	0.02	-29	0.816	-1.76	-0.76	0.84
-73	0.141	-17.01	-16.01	0.03	-28	0.830	-1.62	-0.62	0.87
-72	0.152	-16.34	-15.34	0.03	-27	0.842	-1.49	-0.49	0.89
-71	0.164	-15.69	-14.69	0.03	-26	0.855	-1.36	-0.36	0.92
-70	0.176	-15.08	-14.08	0.04	-25	0.867	-1.24	-0.24	0.95
-69	0.188	-14.50	-13.50	0.04	-24	0.878	-1.13	-0.13	0.97
-68	0.201	-13.95	-12.95	0.05	-23	0.889	-1.02	-0.02	0.99
-67	0.214	-13.41	-12.41	0.06	-22	0.899	-0.92	0.08	1.02
-66	0.226	-12.90	-11.90	0.06	-21	0.909	-0.83	0.17	1.04
-65	0.240	-12.40	-11.40	0.07	-20	0.918	-0.74	0.26	1.06
-64	0.254	-11.92	-10.92	0.08	-19	0.927	-0.66	0.34	1.08
-63	0.268	-11.45	-10.45	0.09	-18	0.935	-0.58	0.42	1.10
-62	0.282	-11.01	-10.01	0.10	-17	0.942	-0.51	0.49	1.12
-61	0.296	-10.57	-9.57	0.11	-16	0.950	-0.45	0.55	1.14
-60	0.310	-10.16	-9.16	0.12	-15	0.956	-0.39	0.61	1.15
-59	0.326	-9.75	-8.75	0.13	-14	0.962	-0.34	0.66	1.16
-58	0.341	-9.35	-8.35	0.15	-13	0.967	-0.29	0.71	1.18
-57	0.356	-8.96	-7.96	0.16	-12	0.973	-0.24	0.76	1.19
-56	0.372	-8.59	-7.59	0.17	-11	0.977	-0.20	0.80	1.20
-55	0.388	-8.22	-7.22	0.19	-10	0.982	-0.16	0.84	1.21
-54	0.404	-7.87	-6.87	0.21	-9	0.985	-0.13	0.87	1.22
-53	0.421	-7.52	-6.52	0.22	-8	0.989	-0.10	0.90	1.23
-52	0.438	-7.18	-6.18	0.24	-7	0.991	-0.08	0.92	1.24
-51	0.455	-6.85	-5.85	0.26	-6	0.993	-0.06	0.94	1.24
-50	0.472	-6.53	-5.53	0.28	-5	0.995	-0.04	0.96	1.25
-49	0.489	-6.22	-5.22	0.30	-4	0.997	-0.03	0.97	1.25
-48	0.506	-5.92	-4.92	0.32	-3	0.998	-0.02	0.98	1.25
-47	0.523	-5.63	-4.63	0.34	-2	0.999	-0.01	0.99	1.26
-46	0.541	-5.34	-4.34	0.37	-1	0.999	-0.00	1.00	1.26
					0	1.000	0.00	1.00	1.26



FMV Dipole
FM

Maximum gain: 1.0 dBd
Vertical polarization

Vertical radiation pattern
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
0	1.000	0.00	1.00	1.26	45	0.558	-5.07	-4.07	0.39
1	0.999	-0.00	1.00	1.26	46	0.541	-5.34	-4.34	0.37
2	0.999	-0.01	0.99	1.26	47	0.523	-5.63	-4.63	0.34
3	0.998	-0.02	0.98	1.25	48	0.506	-5.92	-4.92	0.32
4	0.997	-0.03	0.97	1.25	49	0.489	-6.22	-5.22	0.30
5	0.995	-0.04	0.96	1.25	50	0.472	-6.53	-5.53	0.28
6	0.993	-0.06	0.94	1.24	51	0.455	-6.85	-5.85	0.26
7	0.991	-0.08	0.92	1.24	52	0.438	-7.18	-6.18	0.24
8	0.989	-0.10	0.90	1.23	53	0.421	-7.52	-6.52	0.22
9	0.985	-0.13	0.87	1.22	54	0.404	-7.87	-6.87	0.21
10	0.982	-0.16	0.84	1.21	55	0.388	-8.22	-7.22	0.19
11	0.977	-0.20	0.80	1.20	56	0.372	-8.59	-7.59	0.17
12	0.973	-0.24	0.76	1.19	57	0.356	-8.96	-7.96	0.16
13	0.967	-0.29	0.71	1.18	58	0.341	-9.35	-8.35	0.15
14	0.962	-0.34	0.66	1.16	59	0.326	-9.75	-8.75	0.13
15	0.956	-0.39	0.61	1.15	60	0.310	-10.16	-9.16	0.12
16	0.950	-0.45	0.55	1.14	61	0.296	-10.57	-9.57	0.11
17	0.942	-0.51	0.49	1.12	62	0.282	-11.01	-10.01	0.10
18	0.935	-0.58	0.42	1.10	63	0.268	-11.45	-10.45	0.09
19	0.927	-0.66	0.34	1.08	64	0.254	-11.92	-10.92	0.08
20	0.918	-0.74	0.26	1.06	65	0.240	-12.40	-11.40	0.07
21	0.909	-0.83	0.17	1.04	66	0.226	-12.90	-11.90	0.06
22	0.899	-0.92	0.08	1.02	67	0.214	-13.41	-12.41	0.06
23	0.889	-1.02	-0.02	0.99	68	0.201	-13.95	-12.95	0.05
24	0.878	-1.13	-0.13	0.97	69	0.188	-14.50	-13.50	0.04
25	0.867	-1.24	-0.24	0.95	70	0.176	-15.08	-14.08	0.04
26	0.855	-1.36	-0.36	0.92	71	0.164	-15.69	-14.69	0.03
27	0.842	-1.49	-0.49	0.89	72	0.152	-16.34	-15.34	0.03
28	0.830	-1.62	-0.62	0.87	73	0.141	-17.01	-16.01	0.03
29	0.816	-1.76	-0.76	0.84	74	0.130	-17.73	-16.73	0.02
30	0.803	-1.91	-0.91	0.81	75	0.119	-18.49	-17.49	0.02
31	0.788	-2.07	-1.07	0.78	76	0.108	-19.33	-18.33	0.01
32	0.774	-2.23	-1.23	0.75	77	0.098	-20.21	-19.21	0.01
33	0.758	-2.40	-1.40	0.72	78	0.087	-21.20	-20.20	0.01
34	0.743	-2.58	-1.58	0.70	79	0.077	-22.27	-21.27	0.01
35	0.727	-2.77	-1.77	0.67	80	0.067	-23.49	-22.49	0.01
36	0.711	-2.96	-1.96	0.64	81	0.057	-24.86	-23.86	0.00
37	0.695	-3.16	-2.16	0.61	82	0.047	-26.48	-25.48	0.00
38	0.678	-3.37	-2.37	0.58	83	0.038	-28.42	-27.42	0.00
39	0.662	-3.59	-2.59	0.55	84	0.028	-30.91	-29.91	0.00
40	0.645	-3.81	-2.81	0.52	85	0.019	-34.30	-33.30	0.00
41	0.628	-4.05	-3.05	0.50	86	0.010	-39.94	-38.94	0.00
42	0.610	-4.29	-3.29	0.47	87	0.010	-40.00	-39.00	0.00
43	0.593	-4.54	-3.54	0.44	88	0.010	-40.00	-39.00	0.00
44	0.575	-4.80	-3.80	0.42	89	0.017	-35.56	-34.56	0.00
					90	0.025	-31.89	-30.89	0.00

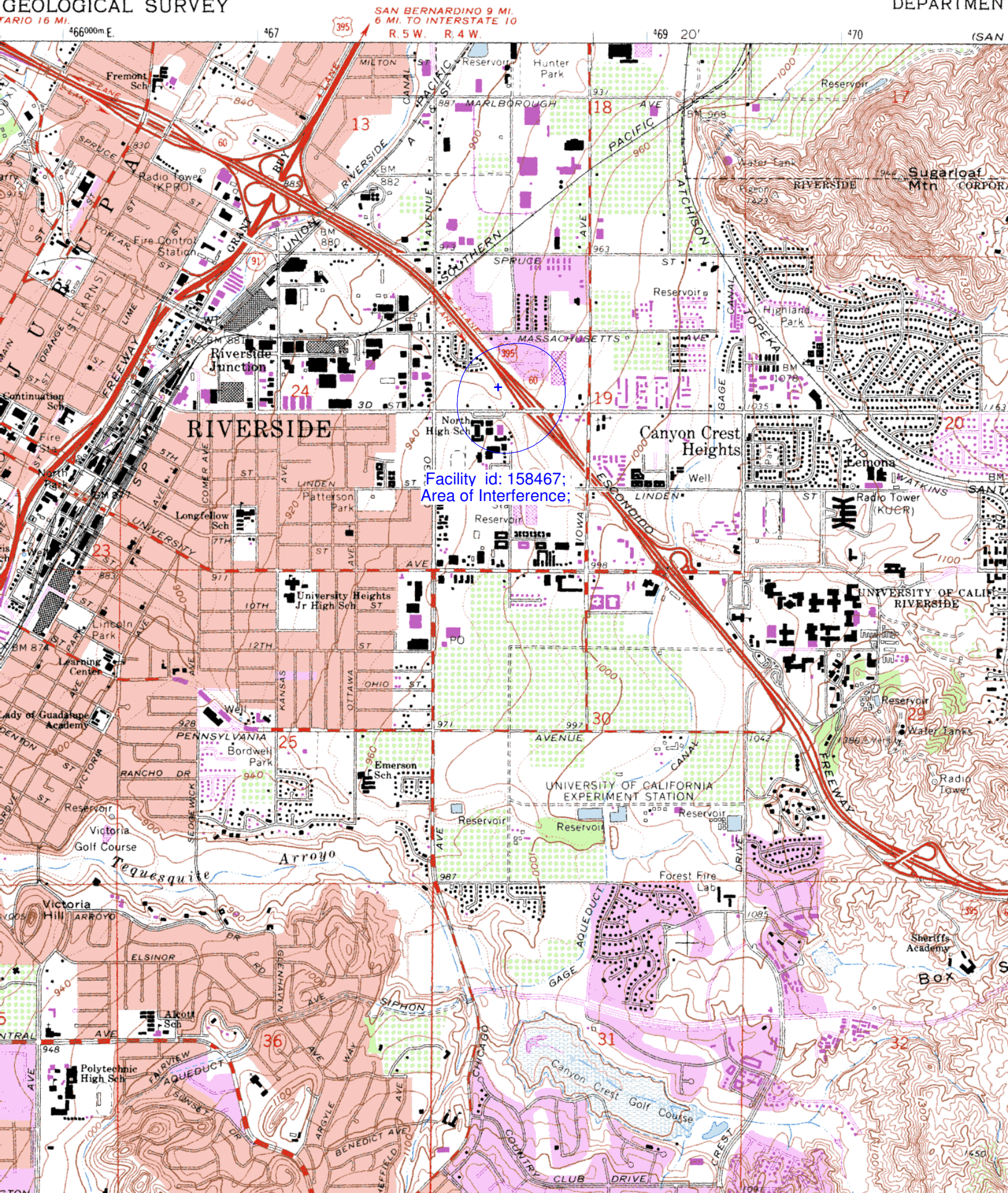
Adjacent Channel Study **For Station NEW, Facility_id: 158467**

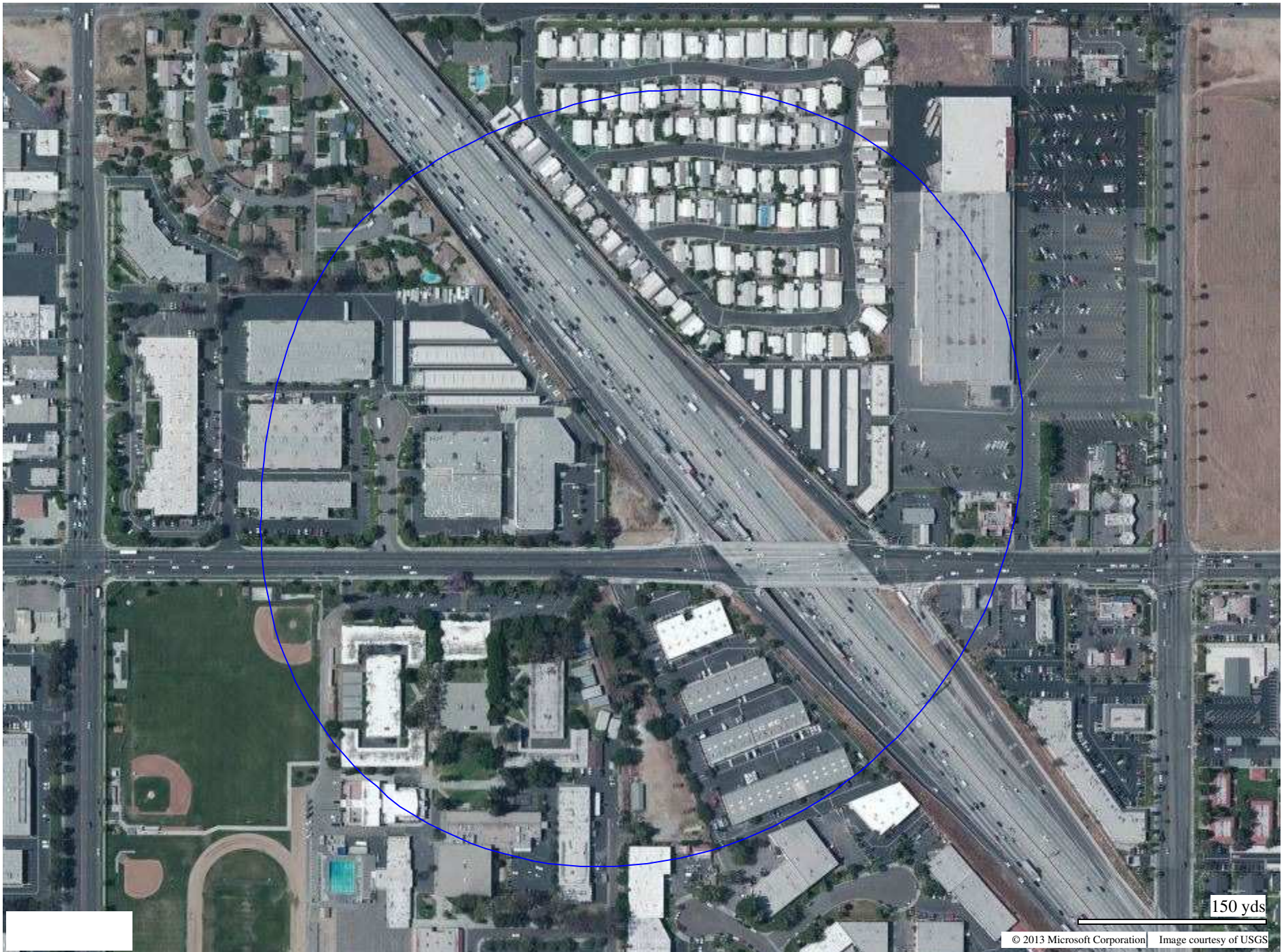
Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
210350	35086	BMLH-19950612KB	KLVE	KLVE-FM LICENSE CORP.	B	LOS ANGELES	CA	LIC	29.5	1811	298	3	71.9	4.8673
1568590	143789	BNPFT-20130731AIL	NEW	RFENGINEERS.COM, INC	D	MORENO VALLEY	CA	APP	0.035	677	294	1	14.5	0
1562026	143789	BNPFT-20030312BAG	NEW	RFENGINEERS.COM, INC	D	MORENO VALLEY	CA	APP	0.035	677	294	1	14.5	0
1562734	156157	BNPFT-20030317HHE	NEW	JUAN ALBERTO AYALA	D	DEL ROSA	CA	APP	0.027	391	292	3	19.9	0
1558244	144632	BNPFT-20030317GMU	NEW	1400 INC.	D	SAN BERNARDINO	CA	APP	0.008	980	296	1	24.3	0
1566963	144632	BNPFT-20130812ABF	NEW	1400 INC.	D	SAN BERNARDINO	CA	APP	0.008	980	296	1	24.3	0
1568216	156157	BNPFT-20130813ABN	NEW	JUAN ALBERTO AYALA	D	SAN BERNARDINO	CA	APP	0.01	1026	292	3	24.3	0
1570455	144632	BNPFT-20130812ABF	NEW	1400 INC.	D	SAN BERNARDINO	CA	APP	0.01	993	296	1	24.3	0
605184	86384	BMLFT-20020618AAF	K295AI	THE ASSOCIATION FOR COMMUNITY EDUCATION,	D	MUSCOY	CA	LIC	0.007	1712	295	0	30.2	0
1567306	141730	BNPFT-20130823AAR	NEW	CALVARY CHAPEL OF COSTA MESA, INC.	D	BEAUMONT	CA	APP	0.007	1156	293	2	39.9	0
1560323	141730	BNPFT-20030314AVV	NEW	CALVARY CHAPEL OF COSTA MESA, INC.	D	BEAUMONT	CA	APP	0.007	1156	293	2	39.9	0
185751	55181	BLH-19930427KB	KIXA	EDB VV LICENSE LLC	A	LUCERNE VALLEY	CA	LIC	0.56	1707	293	2	51.9	0
276212	29020	BLH-19981028KF	KALI-FM	KALI-FM LICENSEE, LLC	A	SANTA ANA	CA	LIC	6	160	292	3	53.6	0
1571164	142718	BNPFT-20130827AER	NEW	PENFOLD COMMUNICATIONS, INC	D	FALLBROOK	CA	APP	0.001	522	294	1	66.4	0
1551661	142718	BNPFT-20030311ARX	NEW	PENFOLD COMMUNICATIONS, INC	D	FALLBROOK	CA	APP	0.001	522	294	1	66.4	0
522922	35113	BMLH-20000927ABW	KSSE	ENTRAVISION HOLDINGS, LLC	A	ARCADIA	CA	LIC	6	625	296	1	66.6	0
78191	35139	BLH-19850508KA	KSSD	ENTRAVISION HOLDINGS, LLC	A	FALLBROOK	CA	LIC	3	358	296	1	68.2	0
1567430	143069	BNPFT-20130815ACG	NEW	REDWOOD EMPIRE STEREOCASTERS	D	PALM SPRINGS	CA	APP	0.25	494	297	2	85	0

Intermediate Frequencies (53 and 54 channels difference):

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
1160595	25809	BMLH-20061117ACW	KRQB	LBI RADIO LICENSE LLC	A	SAN JACINTO	CA	LIC	1.4	1519	241	54	35.1	25.1
1144816	28848	BLH-20060926AHF	KXOL-FM	KXOL LICENSING, INC.	B	LOS ANGELES	CA	LIC	6.6	848	242	53	87.5	72.5





150 yds