

Non-Interference Compliance

Regarding Facility id 148303

Channel 268

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: The only structure within the zone of predicted interference is an unoccupied communications building 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
1147320	BLH20060906ABL	KJMS	92.5	92.5
1492329	BLH20100910ACA	KWNW	99.2	95.5
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				92.5

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 **92.5 dBμ**, this makes the proposed translator's worst-case interfering contour **132.5 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **26.3 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: The only structure within the zone of predicted interference is an unoccupied communications building 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:	PSI
Antenna Model:	FMLE @ 100°
CORAGL:	68 m
Maximum ERP:	0.25 kW
Interfering Contour:	132.5 dBμ
Max Int. Contour Distance:	26.3 m

Adjacent Channel Study **For Station K269EN, Facility_id: 148303**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1492329	51855	BLH-20100910ACA	KWNW	CAPSTAR TX, LLC	C3	CRAWFORDSVIL	AR	LIC	8.5	215	270	2	3.8	1.1697
1147320	35874	BLH-20060906ABL	KJMS	CC LICENSES, LLC	C1	OLIVE BRANCH	MS	LIC	100	244	266	2	12.3	1.1697
1317696	16523	BMLED-20090629AA	WWUN-FM	CALVARY CHAPEL OF TWIN FAL	C3	FRIAR'S POINT	MS	LIC	14	180	268	0	78.1	0
1157892	140023	BLFT-20061106AAG	W269BB	EDUCATIONAL MEDIA FOUNDAT	D	BROWNSVILLE	TN	LIC	0.01	246	269	1	90.6	0
706906	89397	BLH-20031201ABT	WKFF	GEORGE S. FLINN, JR.	A	SARDIS	MS	LIC	4	218	271	3	91.7	0
1485807	151068	BLFT-20120131AJB	K267AS	EAST ARKANSAS BROADCASTI	D	PIGGOTT	AR	LIC	0.25	435	267	1	103.5	0
1398765	70465	BLH-20100916ACV	KIYS	EAST ARKANSAS BROADCASTI	C2	WALNUT RIDGE	AR	LIC	10.5	426	269	1	103.5	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
1358736	84852	BLED-20100305AAT	KLMK	EDUCATIONAL MEDIA FOUNDAT	C2	MARVELL	AR	LIC	50	201	214	54	96.3	81.3



Facility id: 148303;
Area of Interference;

ROAD CLASSIFICATION

- | | |
|------------------|-----------------|
| Heavy-duty | Light-duty |
| Medium-duty | Unimproved dirt |
| Interstate Route | U.S. Route |
| | State Route |



QUADRANGLE LOCATION

WEST MEMPHIS, ARK. - TENN.
NW/4 MEMPHIS 15' QUADRANGLE
35090-B2-TF-024

1966

REVISED 1993

Revisions shown in purple compiled from aerial photographs taken 1990 and other sources. This

West Memphis; AR, TN; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640", 1 cm = 240Mt

