

## **Non-Interference Compliance**

Regarding Facility id 148285

Channel 226

### **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 7 include a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 8 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 9 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 10 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.

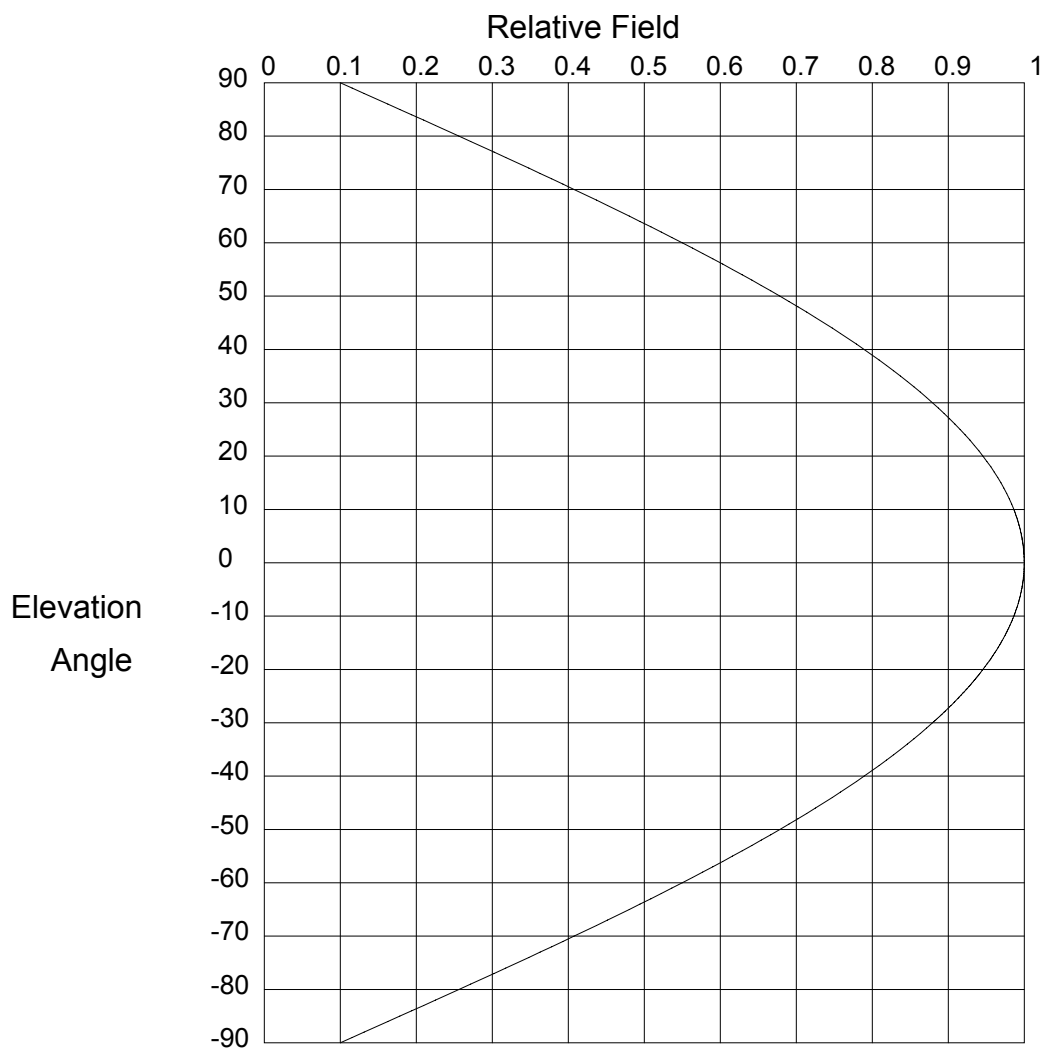
<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1270224	BLH20081006AER	KGWT	66.5	66.5
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>66.5</b>

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 **66.5 dBμ**, this makes the proposed translator's worst-case interfering contour **106.5 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **261.3 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 9 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 **9 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.

<b>Antenna Manufacturer:</b>	<b>SWR</b>
<b>Antenna Model:</b>	<b>FMEC</b>
<b>CORAGL:</b>	<b>145 m</b>
<b>Maximum ERP:</b>	<b>0.062 kW</b>
<b>Interfering Contour:</b>	<b>106.5 dBμ</b>
<b>Max Int. Contour Distance:</b>	<b>261.3 m</b>
<b>Min Ground Clearance:</b>	<b>9 m</b>

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	.997	61.6	260.5	259.6	122.3
10	.986	60.3	257.7	253.8	100.3
15	.969	58.2	253.2	244.6	79.5
20	.946	55.5	247.2	232.3	60.4
25	.916	52.0	239.4	217.0	43.8
30	.879	47.9	229.7	198.9	30.1
35	.837	43.4	218.7	179.2	19.5
40	.789	38.6	206.2	158.0	12.5
45	.736	33.6	192.3	136.0	9.0
50	.679	28.6	177.4	114.1	9.1
55	.616	23.5	161.0	92.3	13.1
60	.550	18.8	143.7	71.9	20.5
65	.480	14.3	125.4	53.0	31.3
70	.408	10.3	106.6	36.5	44.8
75	.333	6.9	87.0	22.5	60.9
80	.256	4.1	66.9	11.6	79.1
85	.178	2.0	46.5	4.1	98.7
90	.100	0.6	26.1	0.0	118.9
Minimum Clearance above TGL:					<b>9 m</b>



## Elevation Pattern

Scale: Linear

Units: Field, Relative

## Systems With Reliability (SWR) LLP

CLIENT: N/A

Date: 8/26/2008

ANTENNA TYPE: FMEC / FMECR/1

FREQUENCY: 98.1 MHz

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/-0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/-0.539 dBd

Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
90.0	.10 (-20)	52.0	.654 (-3.687)	14.0	.973 (-0.235 )
89.0	.116 (-18.733)	51.0	.666 (-3.525)	13.0	.977 (-0.203 )
88.0	.131 (-17.627)	50.0	.679 (-3.369)	12.0	.98 (-0.173 )
87.0	.147 (-16.648)	49.0	.69 (-3.217)	11.0	.983 (-0.145 )
86.0	.163 (-15.768)	48.0	.702 (-3.071)	10.0	.986 (-0.12 )
85.0	.178 (-14.97)	47.0	.714 (-2.928)	9.8	.987 (-0.115 )
84.0	.194 (-14.241)	46.0	.725 (-2.791)	9.6	.987 (-0.11 )
83.0	.21 (-13.569)	45.0	.736 (-2.658)	9.4	.988 (-0.106 )
82.0	.225 (-12.946)	44.0	.747 (-2.529)	9.2	.988 (-0.101 )
81.0	.241 (-12.367)	43.0	.758 (-2.404)	9.0	.989 (-0.097 )
80.0	.256 (-11.826)	42.0	.769 (-2.283)	8.8	.989 (-0.093 )
79.0	.272 (-11.317)	41.0	.779 (-2.167)	8.6	.99 (-0.088 )
78.0	.287 (-10.839)	40.0	.789 (-2.054)	8.4	.99 (-0.084 )
77.0	.302 (-10.387)	39.0	.799 (-1.944)	8.2	.991 (-0.08 )
76.0	.318 (-9.959)	38.0	.809 (-1.839)	8.0	.991 (-0.076 )
75.0	.333 (-9.553)	37.0	.819 (-1.737)	7.8	.992 (-0.073 )
74.0	.348 (-9.167)	36.0	.828 (-1.638)	7.6	.992 (-0.069 )
73.0	.363 (-8.799)	35.0	.837 (-1.543)	7.4	.993 (-0.065 )
72.0	.378 (-8.448)	34.0	.846 (-1.451)	7.2	.993 (-0.062 )
71.0	.393 (-8.112)	33.0	.855 (-1.363)	7.0	.993 (-0.058 )
70.0	.408 (-7.791)	32.0	.863 (-1.277)	6.8	.994 (-0.055 )
69.0	.423 (-7.483)	31.0	.871 (-1.195)	6.6	.994 (-0.052 )
68.0	.437 (-7.187)	30.0	.879 (-1.116)	6.4	.994 (-0.049 )
67.0	.452 (-6.904)	29.0	.887 (-1.04)	6.2	.995 (-0.046 )
66.0	.466 (-6.631)	28.0	.895 (-0.967)	6.0	.995 (-0.043 )
65.0	.48 (-6.369)	27.0	.902 (-0.897)	5.8	.995 (-0.04 )
64.0	.495 (-6.116)	26.0	.909 (-0.83)	5.6	.996 (-0.037 )
63.0	.509 (-5.873)	25.0	.916 (-0.765)	5.4	.996 (-0.035 )
62.0	.523 (-5.638)	24.0	.922 (-0.704)	5.2	.996 (-0.032 )
61.0	.536 (-5.411)	23.0	.928 (-0.645)	5.0	.997 (-0.03 )
60.0	.55 (-5.193)	22.0	.934 (-0.589)	4.8	.997 (-0.027 )
59.0	.564 (-4.982)	21.0	.94 (-0.535)	4.6	.997 (-0.025 )
58.0	.577 (-4.778)	20.0	.946 (-0.485)	4.4	.997 (-0.023 )
57.0	.59 (-4.58)	19.0	.951 (-0.437)	4.2	.998 (-0.021 )
56.0	.603 (-4.39)	18.0	.956 (-0.391)	4.0	.998 (-0.019 )
55.0	.616 (-4.205)	17.0	.961 (-0.348)	3.8	.998 (-0.017 )
54.0	.629 (-4.027)	16.0	.965 (-0.308)	3.6	.998 (-0.015 )
53.0	.642 (-3.854)	15.0	.969 (-0.271)	3.4	.998 (-0.014 )

## Systems With Reliability (SWR) LLP

Page 1 of 3

CLIENT: N/A

Date: 8/26/2008

ANTENNA TYPE: FMEC/1 / FMECR/1

FREQUENCY: 98.1 MHz

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/-0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/-0.539 dBd

Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
3.2	.999 (-0.012)	-4.4	.997 (-0.023)	-12.0	.98 (-0.173 )
3.0	.999 (-0.011)	-4.6	.997 (-0.025)	-12.2	.98 (-0.178 )
2.8	.999 (-0.009)	-4.8	.997 (-0.027)	-12.4	.979 (-0.184 )
2.6	.999 (-0.008)	-5.0	.997 (-0.03)	-12.6	.978 (-0.19 )
2.4	.999 (-0.007)	-5.2	.996 (-0.032)	-12.8	.978 (-0.196 )
2.2	.999 (-0.006)	-5.4	.996 (-0.035)	-13.0	.977 (-0.203 )
2.0	.999 (-0.005)	-5.6	.996 (-0.037)	-13.2	.976 (-0.209 )
1.8	1.00 (-0.004)	-5.8	.995 (-0.04)	-13.4	.975 (-0.215 )
1.6	1.00 (-0.003)	-6.0	.995 (-0.043)	-13.6	.975 (-0.222 )
1.4	1.00 (-0.002)	-6.2	.995 (-0.046)	-13.8	.974 (-0.229 )
1.2	1.00 (-0.002)	-6.4	.994 (-0.049)	-14.0	.973 (-0.235 )
1.0	1.00 (-0.001)	-6.6	.994 (-0.052)	-14.2	.973 (-0.242 )
.8	1.00 (-0.001)	-6.8	.994 (-0.055)	-14.4	.972 (-0.249 )
.6	1.00 (0)	-7.0	.993 (-0.058)	-14.6	.971 (-0.256 )
.4	1.00 (0)	-7.2	.993 (-0.062)	-14.8	.97 (-0.263 )
.2	1.00 (0)	-7.4	.993 (-0.065)	-15.0	.969 (-0.271 )
.0	1.00 (0)	-7.6	.992 (-0.069)	-15.2	.969 (-0.278 )
-.2	1.00 (0)	-7.8	.992 (-0.073)	-15.4	.968 (-0.285 )
-.4	1.00 (0)	-8.0	.991 (-0.076)	-15.6	.967 (-0.293 )
-.6	1.00 (0)	-8.2	.991 (-0.08)	-15.8	.966 (-0.3 )
-.8	1.00 (-0.001)	-8.4	.99 (-0.084)	-16.0	.965 (-0.308 )
-1.0	1.00 (-0.001)	-8.6	.99 (-0.088)	-16.2	.964 (-0.316 )
-1.2	1.00 (-0.002)	-8.8	.989 (-0.093)	-16.4	.963 (-0.324 )
-1.4	1.00 (-0.002)	-9.0	.989 (-0.097)	-16.6	.962 (-0.332 )
-1.6	1.00 (-0.003)	-9.2	.988 (-0.101)	-16.8	.962 (-0.34 )
-1.8	1.00 (-0.004)	-9.4	.988 (-0.106)	-17.0	.961 (-0.348 )
-2.0	.999 (-0.005)	-9.6	.987 (-0.11)	-17.2	.96 (-0.357 )
-2.2	.999 (-0.006)	-9.8	.987 (-0.115)	-17.4	.959 (-0.365 )
-2.4	.999 (-0.007)	-10.0	.986 (-0.12)	-17.6	.958 (-0.374 )
-2.6	.999 (-0.008)	-10.2	.986 (-0.124)	-17.8	.957 (-0.383 )
-2.8	.999 (-0.009)	-10.4	.985 (-0.129)	-18.0	.956 (-0.391 )
-3.0	.999 (-0.011)	-10.6	.985 (-0.134)	-18.2	.955 (-0.4 )
-3.2	.999 (-0.012)	-10.8	.984 (-0.14)	-18.4	.954 (-0.409 )
-3.4	.998 (-0.014)	-11.0	.983 (-0.145)	-18.6	.953 (-0.418 )
-3.6	.998 (-0.015)	-11.2	.983 (-0.15)	-18.8	.952 (-0.427 )
-3.8	.998 (-0.017)	-11.4	.982 (-0.156)	-19.0	.951 (-0.437 )
-4.0	.998 (-0.019)	-11.6	.982 (-0.161)	-19.2	.95 (-0.446 )
-4.2	.998 (-0.021)	-11.8	.981 (-0.167)	-19.4	.949 (-0.456 )

## Systems With Reliability (SWR) LLP

Page 2 of 3

CLIENT: N/A

Date: 8/26/2008

ANTENNA TYPE: FMEC/1 / FMECR/1

FREQUENCY: 98.1 MHz

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/-0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/-0.539 dBd

Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
-19.6	.948 (-0.465)	-27.2	.90 (-0.911)	-54.0	.629 (-4.027 )
-19.8	.947 (-0.475)	-27.4	.899 (-0.924)	-55.0	.616 (-4.205 )
-20.0	.946 (-0.485)	-27.6	.898 (-0.939)	-56.0	.603 (-4.39 )
-20.2	.945 (-0.495)	-27.8	.896 (-0.953)	-57.0	.59 (-4.58 )
-20.4	.944 (-0.505)	-28.0	.895 (-0.967)	-58.0	.577 (-4.778 )
-20.6	.942 (-0.515)	-28.2	.893 (-0.981)	-59.0	.564 (-4.982 )
-20.8	.941 (-0.525)	-28.4	.892 (-0.996)	-60.0	.55 (-5.193 )
-21.0	.94 (-0.535)	-28.6	.89 (-1.01)	-61.0	.536 (-5.411 )
-21.2	.939 (-0.546)	-28.8	.889 (-1.025)	-62.0	.523 (-5.638 )
-21.4	.938 (-0.556)	-29.0	.887 (-1.04)	-63.0	.509 (-5.873 )
-21.6	.937 (-0.567)	-29.2	.886 (-1.055)	-64.0	.495 (-6.116 )
-21.8	.936 (-0.578)	-29.4	.884 (-1.07)	-65.0	.48 (-6.369 )
-22.0	.934 (-0.589)	-29.6	.883 (-1.085)	-66.0	.466 (-6.631 )
-22.2	.933 (-0.6)	-29.8	.881 (-1.101)	-67.0	.452 (-6.904 )
-22.4	.932 (-0.611)	-30.0	.879 (-1.116)	-68.0	.437 (-7.187 )
-22.6	.931 (-0.622)	-31.0	.871 (-1.195)	-69.0	.423 (-7.483 )
-22.8	.93 (-0.633)	-32.0	.863 (-1.277)	-70.0	.408 (-7.791 )
-23.0	.928 (-0.645)	-33.0	.855 (-1.363)	-71.0	.393 (-8.112 )
-23.2	.927 (-0.656)	-34.0	.846 (-1.451)	-72.0	.378 (-8.448 )
-23.4	.926 (-0.668)	-35.0	.837 (-1.543)	-73.0	.363 (-8.799 )
-23.6	.925 (-0.68)	-36.0	.828 (-1.638)	-74.0	.348 (-9.167 )
-23.8	.923 (-0.692)	-37.0	.819 (-1.737)	-75.0	.333 (-9.553 )
-24.0	.922 (-0.704)	-38.0	.809 (-1.839)	-76.0	.318 (-9.959 )
-24.2	.921 (-0.716)	-39.0	.799 (-1.944)	-77.0	.302 (-10.387 )
-24.4	.92 (-0.728)	-40.0	.789 (-2.054)	-78.0	.287 (-10.839 )
-24.6	.918 (-0.74)	-41.0	.779 (-2.167)	-79.0	.272 (-11.317 )
-24.8	.917 (-0.753)	-42.0	.769 (-2.283)	-80.0	.256 (-11.826 )
-25.0	.916 (-0.765)	-43.0	.758 (-2.404)	-81.0	.241 (-12.367 )
-25.2	.914 (-0.778)	-44.0	.747 (-2.529)	-82.0	.225 (-12.946 )
-25.4	.913 (-0.791)	-45.0	.736 (-2.658)	-83.0	.21 (-13.569 )
-25.6	.912 (-0.803)	-46.0	.725 (-2.791)	-84.0	.194 (-14.241 )
-25.8	.91 (-0.816)	-47.0	.714 (-2.928)	-85.0	.178 (-14.97 )
-26.0	.909 (-0.83)	-48.0	.702 (-3.071)	-86.0	.163 (-15.768 )
-26.2	.908 (-0.843)	-49.0	.69 (-3.217)	-87.0	.147 (-16.648 )
-26.4	.906 (-0.856)	-50.0	.679 (-3.369)	-88.0	.131 (-17.627 )
-26.6	.905 (-0.87)	-51.0	.666 (-3.525)	-89.0	.116 (-18.733 )
-26.8	.903 (-0.883)	-52.0	.654 (-3.687)	-90.0	.10 (-20 )
-27.0	.902 (-0.897)	-53.0	.642 (-3.854)	90.0	.00 (-50 )

## Systems With Reliability (SWR) LLP

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CLIENT: N/A

Date: 8/26/2008

ANTENNA TYPE: FMEC/1 / FMECR/1

FREQUENCY: 98.1 MHz

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/-0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/-0.539 dBd

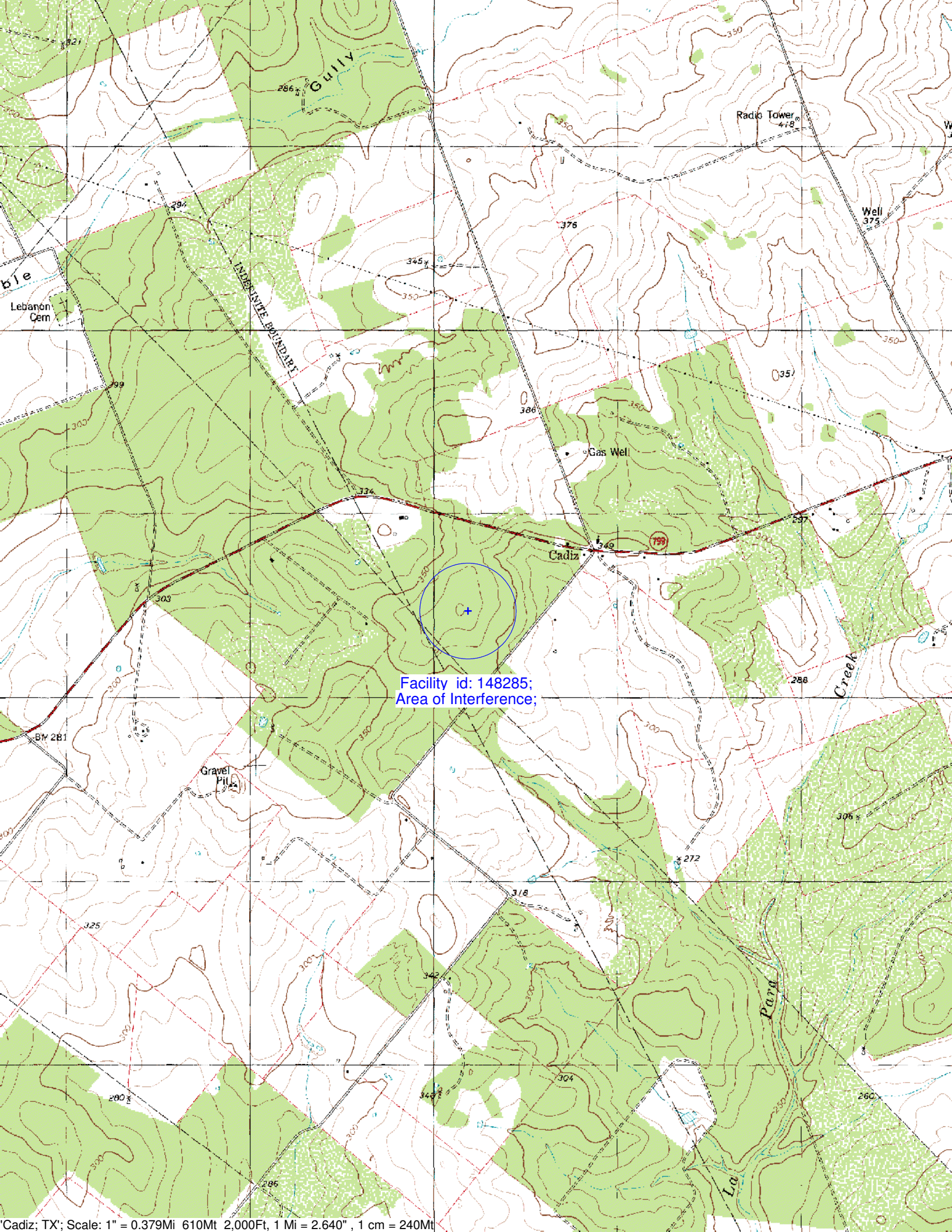
Null Fill(s)(%) : 0, 0, 0

**Adjacent Channel Study**  
**For Station K226AV, Facility\_id: 148285**

**Co-channel through third adjacent:**

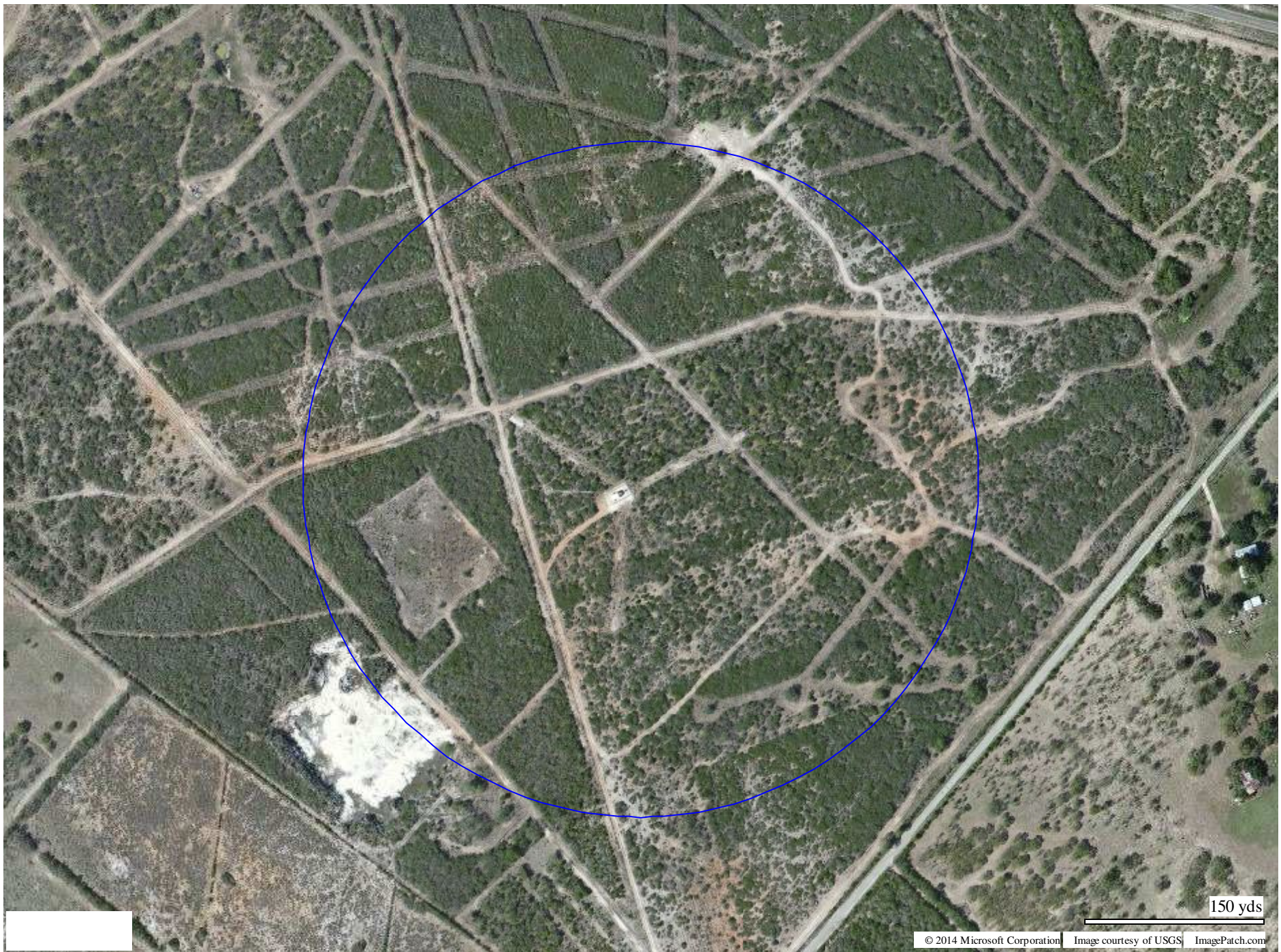
App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCMSL	Chan	Adj	Dist	Overlap
1270224	164180	BLH-20081006AER	KGWT	HISPANIC TARGET MEDIA, INC.	C3	GEORGE WEST	TX	LIC	22.5	188	228	2	30.6	0.9582
1642493	164180	BSTA-20140630AAM	KGWT	HISPANIC TARGET MEDIA, INC.	C3	GEORGE WEST	TX	APP	0.5	85.1	228	2	19.1	0
1570951	148239	BNPFT-20130826ADD	K224EI	WENDOLYNN TELLEZ	D	GEORGE WEST	TX	CP	0.2	145	224	2	21.1	0
1634857	147326	BPFT-20140409AAE	K226CF	GERALD BENAVIDES	D	CORPUS CHRISTI	TX	CP	0.25	134	226	0	87.7	0
1107941	141432	BLFT-20060112AAC	K228XM	LISA LOPEZ	D	CORPUS CHRISTI	TX	LIC	0.25	84	228	2	88.9	0
1547680	34918	BLH-20130401AKD	KKBA	MALKAN INTERACTIVE COMMUNICATIONS, L.L.C	C2	KINGSVILLE	TX	LIC	13	260.3	224	2	92.7	0
1632873	147326	BLFT-20140403ABT	K226CF	GERALD BENAVIDES	D	INGLESIDE	TX	LIC	0.2	107	226	0	94.5	0
1570033	147995	BNPFT-20130826ACT	K224EH	WENDOLYNN TELLEZ	D	VICTORIA	TX	CP	0.14	101	224	2	98.4	0
247356	67071	BLH-19970530KA	KROM	TICHENOR LICENSE CORPORATION	C1	SAN ANTONIO	TX	LIC	45	570	225	1	99.5	0
1571075	138173	BNPFT-20130827AAM	K228FC	WORLD RADIO NETWORK, INC.	D	KINGSVILLE	TX	CP	0.05	71	228	2	101.6	0
1541116	145452	BLFT-20130211AAN	K226BA	THE WORSHIP CENTER OF KINGSVILLE	D	KINGSVILLE	TX	LIC	0.07	118	226	0	106.6	0
1590991	195780	BNPL-20131112CFH	KNPI-LP	TEXAS PELICAN MEDIA	L1	PADRE ISLAND,TE	TX	CP	0	26	227	1	109.3	0
173544	12179	BLH-19920518KB	KITE	VICTORIA RADIOWORKS, LLC	C1	PORT LAVACA	TX	LIC	100	107	227	1	116.2	0
276119	25904	BLH-19981026KD	KRPT	CC LICENSES, LLC	C2	DEVINE	TX	LIC	50	336	223	3	121.1	0
1485274	170977	BLH-20120123AAQ	KKDL	ISAAC TELLEZ EVANGELISTIC MINISTRIES INC	A	DILLEY	TX	LIC	2.5	233	229	3	123.1	0
1537154	165972	BPH-20120814ABM	KSAG	WENDOLYNN TELLEZ	A	PEARSALL	TX	CP	6	283	227	1	123.5	0





Facility id: 148285;  
Area of Interference;





150 yds