

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 144146

Channel 284

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 dB μ 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.

NOTE: The adjacent channel study indicates prohibitive overlap with co-channel NEW, Sacramento, CA (FIN: 194555) application BNPL-20131112BHQ. This application will be dismissed.

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 structures within the zone of predicted interference are unoccupied communications buildings 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
71821	BLH19840815CB	KNCI	73.5	71.9
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			71.9

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 **71.9 dBμ**, this makes the proposed translator's worst-case interfering contour **111.9 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **281.8 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 structures within the zone of predicted interference are unoccupied communications buildings 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: SCA
Antenna Model: YA7-FML @ 218°
CORAGL: 23 m
Maximum ERP: 0.25 kW
Interfering Contour: 111.9 dBμ
Max Int. Contour Distance: 281.8 m

Adjacent Channel Study For Station K282BK, Facility_id: 144146

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1712467	194555	BNPL-20131112BHQ	NEW	NORTH SACRAMENTO COMMUN	L1	SACRAMENTO	CA	APP	0	0	284	0	30.1	38.5325
71821	20353	BLH-19840815CB	KNCI	CBS RADIO STATIONS INC.	B	SACRAMENTO	CA	LIC	50	333	286	2	12.3	0.88
1090172	144606	BLFT-20051007AAK	K283AY	LA FAVORITA RADIO NETWORK,	D	WEST POINT	CA	LIC	0.13	1049	283	1	49.6	0
1683949	195602	BLL-20150727AAT	KYTP-LP	IGLESIA ROSA DE SARON	L1	GALT	CA	LIC	0	45	283	1	58.4	0
1634328	83228	BPFT-20130329AAL	K284AG	NEVADA CITY COMMUNITY BRO/	D	WOODLAND	CA	CP	0.13	30	284	0	63.7	0
625791	53653	BLH-20030218AAQ	KXSE	ENTRAVISION HOLDINGS, LLC	A	DAVIS	CA	LIC	3.4	147	282	2	63.8	0
1172371	124166	BLL-20070208AAU	KCYC-LP	NORTH VALLEY CALVARY CHAP	L1	YUBA CITY	CA	LIC	0	47	284	0	68.9	0
1583313	144606	BPFT-20131028ASG	K283AY	LA FAVORITA RADIO NETWORK,	D	WEST POINT	CA	CP	0.13	1644	283	1	74.6	0
1583303	194202	BNPL-20131113AAJ	KELR-LP	ETERNAL LIFE RADIO	L1	STOCKTON	CA	CP	0	29.8	284	0	88	0
1016422	156135	BLFT-20040929AFG	K286AN	NEVADA CITY COMMUNITY BRO/	D	TRUCKEE	CA	LIC	0.01	2635	286	2	93.6	0
1722356	144158	BLFT-20160222AAJ	K287BS	HISPANIC FAMILY CHRISTIAN NE	D	STOCKTON	CA	LIC	0.17	37	287	3	95	0
1722835	144158	BPFT-20160301AGU	K287BS	HISPANIC FAMILY CHRISTIAN NE	D	STOCKTON	CA	APP	0.17	37	286	2	95	0
1332499	83228	BLFT-20090904ACH	K284AG	NEVADA CITY COMMUNITY BRO/	D	WOODLAND	CA	LIC	0.01	587	284	0	98.5	0
209243	18526	BLFTB-19950522TE	KITS-FM4	CBS RADIO EAST INC.	D	ANTIOCH	CA	LIC	0.33	85	287	3	108	0
194669	7914	BLH-19940204KM	KYIX	BUTTE BROADCASTING COMPAI	A	SOUTH OROVILLE	CA	LIC	0.26	932	285	1	111.3	0
1510693	123802	BLL-20120803ABK	KGIG-LP	FELLOWSHIP OF THE EARTH (FC	L1	MODESTO	CA	LIC	0	27.6	285	1	112.9	0
213328	38457	BMLH-19950831KA	KDOT	LOTUS RADIO CORP.	C	RENO	NV	LIC	25	2967	283	1	116.1	0
156398	54773	BLFTB-19910122TP	KFOG-FM3	SUSQUEHANNA RADIO CORP.	D	PLEASANTON, ET	CA	LIC	0.185	1155	283	1	123.5	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
658493	48339	BLH-20030430AAA	KNCO-FM	NEVADA COUNTY BROADCASTE	A	GRASS VALLEY	CA	LIC	0.66	1190	231	53	58.5	48.5
492270	55494	BLH-20000208ABR	KRLT	D&H BROADCASTING LLC	A	SOUTH LAKE TA	CA	LIC	3	1989	230	54	94.6	84.6



