

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 151365

Channel 294

### **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 $\mu$  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: There are no major roads or buildings within the zone of interference, 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>
263606	BLH19980312KC	KURQ	61.8	61.8
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>61.8</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 **61.8 dBμ**, this makes the proposed translator's worst-case interfering contour **101.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **57 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"). 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.

**NOTE: There are no major roads or buildings within the zone of interference, 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:** WRL  
**Antenna Model:** FMPV1  
**CORAGL:** 4 m  
**Maximum ERP:** 0.001 kW  
**Interfering Contour:** 101.8 dBμ  
**Max Int. Contour Distance:** 57 m

**Adjacent Channel Study**  
**For Station K293BG, Facility\_id: 151365**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1428606	189477	BSFH	20110202ADD	NEW	HISPANIC TARGET MEDIA INC.	A	CAMBRIA	CA	APP	0	0	293	1	5.2	25.8189
263606	54364	BLH	19980312KC	KURQ	EDB SLO LICENSE LLC	B	GROVER BEACH	CA	LIC	3.5	842	297	3	45.7	0.2376
1414862	152377	BLFT	20110121ACK	K293AW	SAN LUIS OBISPO BROADCASTING, INC.	D	EL PASO DE ROBLES	CA	LIC	0.115	553	293	1	33.7	0
252567	81928	BLFT	19970827TA	K295AG	FAMILY STATIONS, INC.	D	PASO ROBLES	CA	LIC	0.17	280	295	1	38.2	0
615425	25960	BLH	20021018AAC	KWWV	MAPLETON LICENSE OF SAN LUIS OBISPO, LLC	B1	SANTA MARGARITA	CA	LIC	1.1	779	291	3	45.5	0
1428937	152377	BMPFT	20110523AFH	K293AW	SAN LUIS OBISPO BROADCASTING, INC.	D	EL PASO DE ROBLES	CA	APP	0.25	171	293	1	51	0
1423200	152377	BPFT	20110126AAA	K293AW	SAN LUIS OBISPO BROADCASTING, INC.	D	EL PASO DE ROBLES	CA	CP	0.25	171	293	1	51	0
259577	54968	BLH	19971222KF	KMJV	WOLFHOUSE RADIO GROUP, INC.	A	SOLEDAD	CA	LIC	4.7	393	292	2	80.6	0
576925	63553	BLH	20010808AAA	KSMY	EDB SLO LICENSE LLC	B1	LOMPOC	CA	LIC	3.5	421	294	0	108.7	0



Facility id: 151365;  
Area of Interference;

151365 - Proposed 101.8 dBu



Imagery Date: 7/1/2007

62 m

Image © 2011 DigitalGlobe

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35°33'50.27" N 121°05'37.83" W elev 29 m

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Eye alt 285 m