

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 145073

Channel 248

### **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 structures within the zone of 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1550855	BPH20130430ABE	KLUK	77.9	77.9
208701	BLH19950502KA	KLUK	72.8	72.8
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>72.8</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 **72.8 dBμ**, this makes the proposed translator's worst-case interfering contour **112.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **113.6 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 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:** CL-FM @ 330°  
**CORAGL:** 6 m  
**Maximum ERP:** 0.05 kW  
**Interfering Contour:** 112.8 dBμ  
**Max Int. Contour Distance:** 113.6 m

**Adjacent Channel Study  
For Station NEW, Facility\_id: 145073**

**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
208701	8385	BLH-19950502KA	KLUK	CAMERON BROADCASTING, INC.	C1	NEEDLES	CA	LIC	29.5	1260	250	2	42.7	0.0453
1550855	8385	BPH-20130430ABE	KLUK	CAMERON BROADCASTING, INC.	C	NEEDLES	CA	CP	100	1254	250	2	42.8	0.0453
1561856	152189	BNPFT-20030317HJO	NEW	DONALD F. HENDREN	D	KINGMAN	AZ	APP	0.028	1522	247	1	43.1	0
1570011	152189	BNPFT-20130821ABG	NEW	DONALD F. HENDREN	D	KINGMAN	AZ	APP	0.028	1522	247	1	43.1	0
1352531	9039	BLFT-20100108AAQ	K246AE	STEVEN M. GREELEY	D	LAKE HAVASU CIT	AZ	LIC	0.01	1440	246	2	65.8	0
1547342	9039	BMPFT-20130325AGO	K246AE	STEVEN M. GREELEY	D	LAKE HAVASU CIT	AZ	CP MOD	0.25	1440	246	2	65.8	0
1562042	147059	BPFT-20130708AAQ	K248BJ	ADVANCE MINISTRIES, INC. D/B/A/ NEW LIFE	D	MOHAVE VALLEY	AZ	APP	0.25	1466	248	0	78	0
1251438	54323	BLFT-20080619AIH	K245AW	ADVANCE MINISTRIES, INC.	D	RIVERIA, ETC.	AZ	LIC	0.157	1473	245	3	78	0
1559013	147059	BLFT-20130611ACW	K248BJ	ADVANCE MINISTRIES, INC. D/B/A/ NEW LIFE	D	MOHAVE VALLEY	AZ	LIC	0.195	1466	248	0	78	0
1523285	48502	BLFT-20121106AAR	K251BS	CALVARY CHAPEL OF COSTA MESA, INC.	D	NORTH LAS VEGAS	NV	LIC	0.18	1349	251	3	140	0
982608	92496	BLFTB-20031216AAA	KVEG-FM1	KEMP BROADCASTING, INC.	D	HENDERSON	NV	LIC	20	1020	248	0	142.4	0
232130	38450	BLH-19960913KA	KXPT	LOTUS BROADCASTING CORP.	C	LAS VEGAS	NV	LIC	25	2582	246	2	174.1	0
573342	83278	BLH-20010711AAI	KVEG	KEMP BROADCASTING, INC.	C	MESQUITE	NV	LIC	100	1203	248	0	177.2	0
1488389	190224	BNPH-20120221ACZ	NEW	GRENAX BROADCASTING II, LLC	C2	MUNDS PARK	AZ	APP	5	2622	246	2	218.7	0
1198753	150097	BLFT-20070806AAT	K246BI	RADIO ASSIST MINISTRY, INC.	D	WINSLOW	AZ	LIC	0.025	1483	246	2	292.6	0
1419081	37577	BSTA-20110228ADC	KRDE	LINDA C. CORSO	C1	SAN CARLOS	AZ	APP	2.1	2378	247	1	346	0
1399096	11894	BLH-20100928ADE	KIKO-FM	1TV.COM, INC.	C2	CLAYPOOL	AZ	LIC	0.67	2352	247	1	346.9	0
644278	151203	BNPFT-20030317CFW	NEW	RADIO ASSIST MINISTRY, INC.	D	SHOW LOW	AZ	APP	0.015	2385.2	247	1	375.8	0



