

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 1665

Channel 217

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.

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 buildings within the zone of predicted interference. The only road within the zone is a non paved pivot irrigation access road 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
1234395	BLED20080213AHG	KMLU	77.5	76.6
1292773	BLED20090116ACO	KPGA	69.2	69.2
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				69.2

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 **69.2 dBμ**, this makes the proposed translator's worst-case interfering contour **109.2 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **76.9 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: There are no buildings within the zone of predicted interference. The only road within the zone is a non paved pivot irrigation access road 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: 0.01 kW
Interfering Contour: 109.2 dBμ
Max Int. Contour Distance: 76.9 m

Adjacent Channel Study
For Station K217FB, Facility_id: 1665

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1234395	92949	BLED	20080213AHG	KMLU	EDUCATIONAL MEDIA FOUNDATION	A	BROWNFIELD	TX	LIC	0.13	1091	214	3	3.9	0.0597
1292773	84763	BLED	20090116ACO	KPGA	EDUCATIONAL MEDIA FOUNDATION	C1	MORTON	TX	LIC	100	1193	220	3	41	0.0597
1103250	1587	BLFT	20051206ADQ	K218DZ	HORIZON CHRISTIAN FELLOWSHIP	D	LEVELLAND	TX	LIC	0.092	1215	218	1	45.6	0
1020363	122140	BLFT	20041018ABG	K218DI	PENSACOLA CHRISTIAN COLLEGE, INC.	D	WOODROW	TX	LIC	0.025	1068	218	1	47.9	0
1323911	5174	BPED	20090720AED	KKLU	EDUCATIONAL MEDIA FOUNDATION	C2	LUBBOCK	TX	CP	20	1158	215	2	52	0
586910	84914	BLED	20011113ACL	KBKN	LA PROMESA FOUNDATION	A	LAMESA	TX	LIC	0.25	954	217	0	54.5	0
618642	5174	BLED	20021126ACY	KKLU	EDUCATIONAL MEDIA FOUNDATION	C3	LUBBOCK	TX	LIC	13.5	1041	215	2	56.3	0
1399130	171699	BLED	20100825AAG	KQOA	LA PROMESA FOUNDATION	A	MORTON	TX	LIC	1.1	1200	216	1	77.9	0



Facility id: 1665;
Area of Interference;

BROWNFIELD

