

## **Non-Interference Compliance**

Regarding Facility id 153662

Channel 281

### **Description of Exhibit 12 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.

Since the proposed translator is within 320 km of the Mexican border, 47 C.F.R. § 74.1235(d) has been taken into account and this applicant certifies that in the direction of the Mexican border, the proposed translator's 60 dBμ F(50,50) contour does not lie within 116.3 km of the Mexican border. This application is therefore in full compliance with 47 C.F.R. § 74.1235(d)(2), which states that for translators between 125 and 320 km from the border, "in no event shall the location of the 60 dBμ contour lie within 116.3 km of the Mexican border," and hence complies with 47 C.F.R. § 74.1204(h).

### 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>
1040485	BMLH20050203AEF	KPUS	68.6	68.6
1082987	BPH20050923AFO	KOUL	80.6	80.2
679260	BLH20030814AJZ	KOUL	80.6	80.2
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>68.6</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 **68.6 dBμ**, this makes the proposed translator's worst-case interfering contour **108.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **247.2 m** from the transmit antenna.

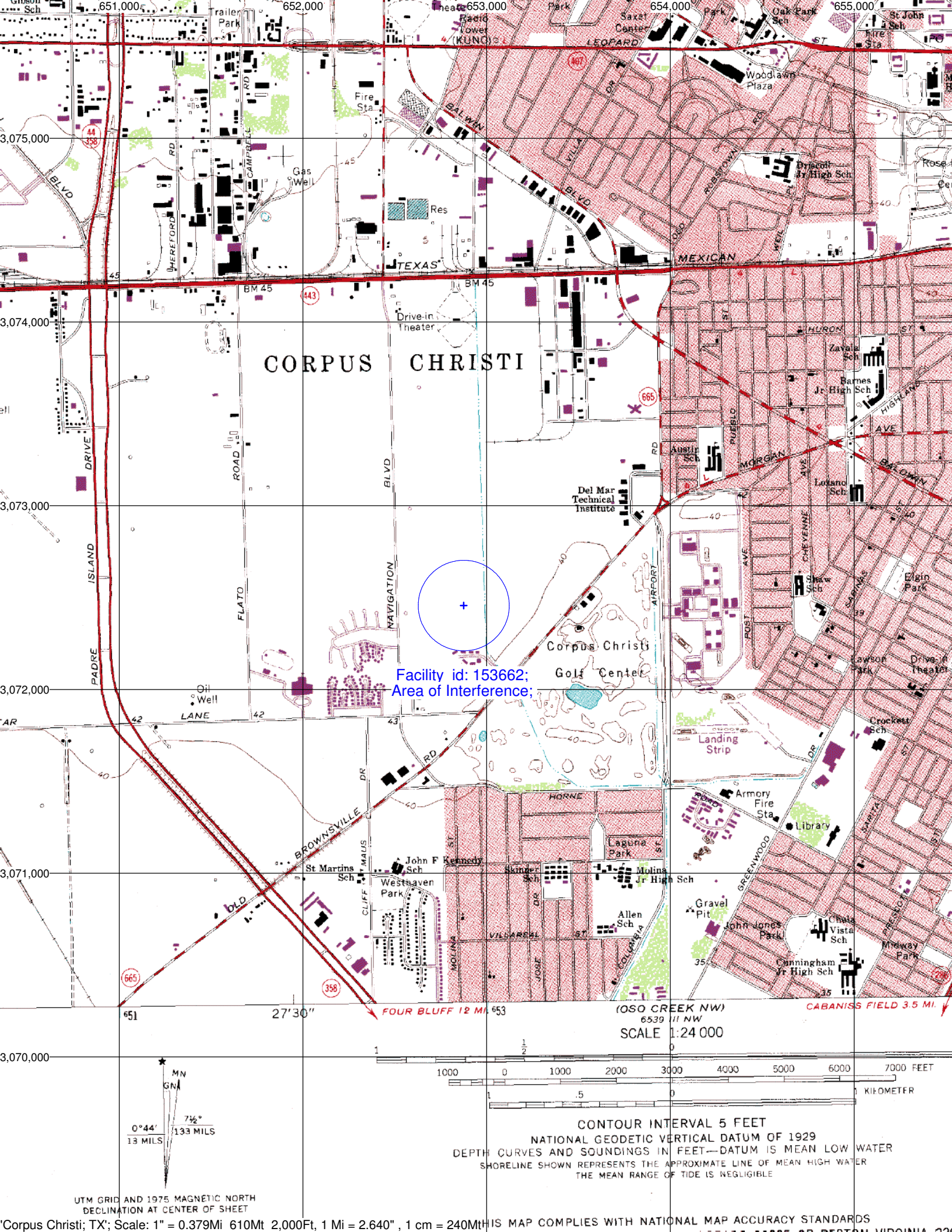
The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section 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.

**Antenna Manufacturer:** NIC  
**Antenna Model:** BKG77  
**CORAGL:** 91 m  
**Maximum ERP:** 0.09 kW  
**Interfering Contour:** 108.6 dBμ  
**Max Int. Contour Distance:** 247.2 m

# **Adjacent Channel Study** **For Station K281AV, Facility\_id: 153662**

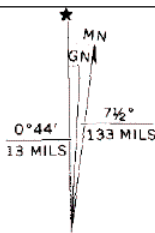
## **Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCMSL	Channel	Adj	Dist	Overlap
1040485	78383	BMLH	20050203AEF	KPUS	CONVERGENT BROADCASTING OF CORPUS CHF	C3	GREGORY	TX	LIC	14	137	283	2	25.1	0.5371
1082987	7084	BPH	20050923AFO	KOUL	TEJAS BROADCASTING LTD., LLP	C1	REFUGIO	TX	CP	100	302	279	2	29.6	0.5371
679260	7084	BLH	20030814AJZ	KOUL	BMP DFW LICENSE COMPANY, L.P.	C1	SINTON	TX	LIC	100	302	279	2	29.6	0.5371
640022	147361	BNPFT	20030317AEY	NEW	GERALD BENAVIDES	D	KINGSVILLE	TX	APP	0.05	71	281	0	50.4	0
627733	138173	BNPFT	20030310AOI	NEW	WORLD RADIO NETWORK, INC.	D	KINGSVILLE	TX	APP	0.05	66	281	0	50.4	0
1179973	171034	BSFH	20061219AFT	NEW	CRAWFORD, CHARLES E	A	BENAVIDES	TX	APP	0	0	282	1	98.7	0
258615	27619	BLH	19971202KC	KULF	HOOTEN BROADCASTING, INC	C2	GANADO	TX	LIC	50	159	284	3	144.3	0
1018907	83596	BPH	20041230ACP	KRIO-FM	BMP SAN ANTONIO LICENSE COMPANY, L.P.	C1	PEARSALL	TX	CP	36	577	281	0	166.6	0
605620	83596	BLH	20020712AAC	KRIO-FM	RADIO TUNA, LTD.	C1	PEARSALL	TX	LIC	100	430	281	0	166.6	0



Facility id: 153662;  
Area of Interference;

SCALE 1:24 000



CONTOUR INTERVAL 5 FEET  
NATIONAL GEODETIC VERTICAL DATUM OF 1929  
DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS MEAN LOW WATER  
SHORELINE SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER  
THE MEAN RANGE OF TIDE IS NEGLECTIBLE

UTM GRID AND 1975 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

Corpus Christi; TX; Scale: 1" = 0.379Mi 610M 2,000Ft, 1 Mi = 2.640" , 1 cm = 240M

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS