

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 152138

Channel 227

### **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: The only structures within the zone of predicted interference are unoccupied communication 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.

<u>Application_id</u>	<u>File Number</u>	<u>Callsign</u>	<u>Contour at Tower</u>	<u>Min. Contour</u>
1645280	BLFT20140728AAM	K224BV	189.5	100
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>100</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 **100 dBμ**, this makes the proposed translator's worst-case interfering contour **140 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **2.2 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).

**Note: The only structures within the zone of predicted interference are unoccupied communication 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:** HDCA-10H  
**CORAGL:** 6 m  
**Maximum ERP:** 0.01 kW  
**Interfering Contour:** 140 dBμ  
**Max Int. Contour Distance:** 2.2 m

**Adjacent Channel Study  
For Station K227CS, Facility\_id: 152138**

**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1645280	967	BLFT-20140728AAM	K224BV	ADVANCE MINISTRIES, INC. D/B/A	D	KINGMAN	AZ	LIC	0.25	2356	224	3	0	0.0077
1571409	156594	BNPFT-20130828AAI	K230BN	DONALD F. HENDREN	D	KINGMAN	AZ	CP	0.01	2357	230	3	2.9	0
1571536	155726	BNPFT-20130822AAV	K225BU	DONALD F. HENDREN	D	HACKBERRY	AZ	CP	0.062	1195	225	2	28.1	0
1638576	164262	BLH-20140521AEF	KVYL	BIG RIVER BROADCASTING LLC	C3	MOHAVE VALLEY	AZ	LIC	0.62	1350	229	2	42.5	0
1559558	88674	BPH-20130531AKY	KRIT	FARMWORKER EDUCATIONAL R	B1	PARKER	AZ	CP	6.1	527.8	224	3	90.4	0
1560333	191554	BNPH-20130710AAI	KFMS	FMI MEDIA, INC.	C3	PAULDEN	AZ	CP	3.9	1689	228	1	125.3	0
1230740	72528	BLH-20080201BGH	KADD	M&M BROADCASTING LLC	C	LOGANDALE	NV	LIC	93	1755	228	1	172.5	0
205225	6893	BLH-19941228KD	KPLV	CITICASTERS LICENSES, INC.	C	LAS VEGAS	NV	LIC	24	2606	226	1	174.1	0
1641214	27982	BMLH-20140619ABW	KRRN	ENTRAVISION HOLDINGS, LLC	C	MOAPA VALLEY	NV	LIC	100	1173	224	3	178.4	0



