

Non-Interference Compliance

Regarding Facility id 22197

Channel 233

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 a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by the U.S. Geological Survey's National Aerial Photography Program. It has been included to provide clarification of the nature of the buildings in the vicinity.

Note: There are no buildings or major roads within the zone of predicted interference which extends 1.5m from the base of the proposed transmit tower, 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
1079709	BMLH20000616AAS	KZBQ	127.8	110.1
1237151	BPH20080602BQM	KZBQ	124.7	115.7
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				110.1

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 **110.1 dBμ**, this makes the proposed translator's worst-case interfering contour **150.1 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **1.5 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 buildings or major roads within the zone of predicted interference which extends 1.5m from the base of the proposed transmit tower, 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: NIC
Antenna Model: BKG77
CORAGL: 6 m
Maximum ERP: 0.045 kW
Interfering Contour: 150.1 dBμ
Max Int. Contour Distance: 1.5 m

Adjacent Channel Study **For Station K296EA, Facility_id: 22197**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1164734	30246	BMLH	20061221AAH	KPKY	GAP BROADCASTING POCATELLO LICENSE, LL	C	POCATELLO	ID	LIC	100	1808	235	2	0	0.2685
1237151	28254	BPH	20080602BQM	KZBQ	IDAHO WIRELESS CORPORATION	C0	POCATELLO	ID	CP	100	1861	230	3	1.3	0.2685
635194	143065	BNPFT	20030317ENH	NEW	RADIO ASSIST MINISTRY, INC.	D	AMERICAN FALLS	ID	APP	0.041	1581.6	231	2	27.5	0
662421	64698	BLH	20030424ABO	KSNA	SAND HILL MEDIA CORP.	C2	REXBURG	ID	LIC	43	1635	232	1	107.6	0
1247586	56345	BPED	20080602AHA	KBYI	BRIGHAM YOUNG UNIVERSITY - IDAHO	C1	REXBURG	ID	CP	100	1687	232	1	108.5	0
1020048	55458	BMLH	20001228AAB	KVFX	SUN VALLEY RADIO, INC.	C0	LOGAN	UT	LIC	94	1773	233	0	117.7	0
1185209	164127	BLH	20070514ABZ	KTPZ	LOCALLY OWNED RADIO, LLC	C3	HAZELTON	ID	LIC	4.9	1398	232	1	156.2	0

MICHAUD CREEK QUADRANGLE
IDAHO
7.5 MINUTE SERIES (TOPOGRAPHIC)

3589 IV NW
(POCATELLO NORTH)



