

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 146561

Channel 270

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: The only structures within the zone of predicted 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 dB μ 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
107797	BLH19871216KF	KMGI	128.1	120.6
681022	BMLH20030825ANH	KCVI	66.5	66.5
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				66.5

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 **66.5 dB μ** , this makes the proposed translator's worst-case interfering contour **106.5 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **330.2 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 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: PSI
Antenna Model: FML-1-DA
CORAGL: 15 m
Maximum ERP: 0.099 kW
Interfering Contour: 106.5 dB μ
Max Int. Contour Distance: 330.2 m

**Adjacent Channel Study
For Station K231BY, Facility_id: 146561**

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
107797	51215	BLH-19871216KF	KMGI	PACIFIC EMPIRE RADIO CORPORATION	C	POCATELLO	ID	LIC	100	1840	273	3	0.9	0.3741
681022	71785	BMLH-20030825ANH	KCVI	RIVERBEND COMMUNICATIONS, LLC	C	BLACKFOOT	ID	LIC	95	2030	268	2	70.8	0.3741
299732	8810	BLFT-143	K272AG	CARIBOU COUNTY TV ASSOCIATION	D	SODA SPRINGS, E	ID	LIC	0.055	2148	272	2	73	0
1319678	131852	BLL-20090629AAG	KUMG-LP	RUPERT UNITED METHODIST CHURCH	L1	RUPERT	ID	LIC	0	1296.7	269	1	99.3	0
299731	22345	BLFT-16	K272AB	FRANKLIN COUNTY TV DISTRICT #1	D	PRESTON, ETC.	ID	LIC	0.008	1878	272	2	102.9	0
1340597	146563	BLFT-20091102AAF	K269FQ	TRI-STATE BROADCASTING, LLC	D	MONTPELIER	ID	LIC	0.115	1956	269	1	117.7	0
994365	87925	BLH-20040226AAC	KCHQ	RICH BROADCASTING IDAHO LS, LLC	C1	DRIGGS	ID	LIC	4	2684	271	1	132.5	0
1600577	87925	BPH-20130923AAZ	KCHQ	RICH BROADCASTING IDAHO LS, LLC	C1	DRIGGS	ID	CP	16	2610	271	1	133.2	0
1370439	164129	BPH-20100524AAA	KIRQ	LOCALLY OWNED RADIO, LLC	C2	KIMBERLY	ID	CP	23	1392	271	1	156.2	0

MICHAUD CREEK QUADRANGLE
IDAHO
7.5 MINUTE SERIES (TOPOGRAPHIC)

3569 IV NW
(POCATELLO NORTH)



