

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 153609

Channel 281

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 buildings 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 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
1503246	BPH20120629ADB	KCDD	80.8	80.8
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			80.8

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 **80.8 dBμ**, this makes the proposed translator's worst-case interfering contour **120.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **101.2 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 buildings 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: SWR
Antenna Model: FM1
CORAGL: 73 m
Maximum ERP: 0.25 kW
Interfering Contour: 120.8 dBμ
Max Int. Contour Distance: 101.2 m

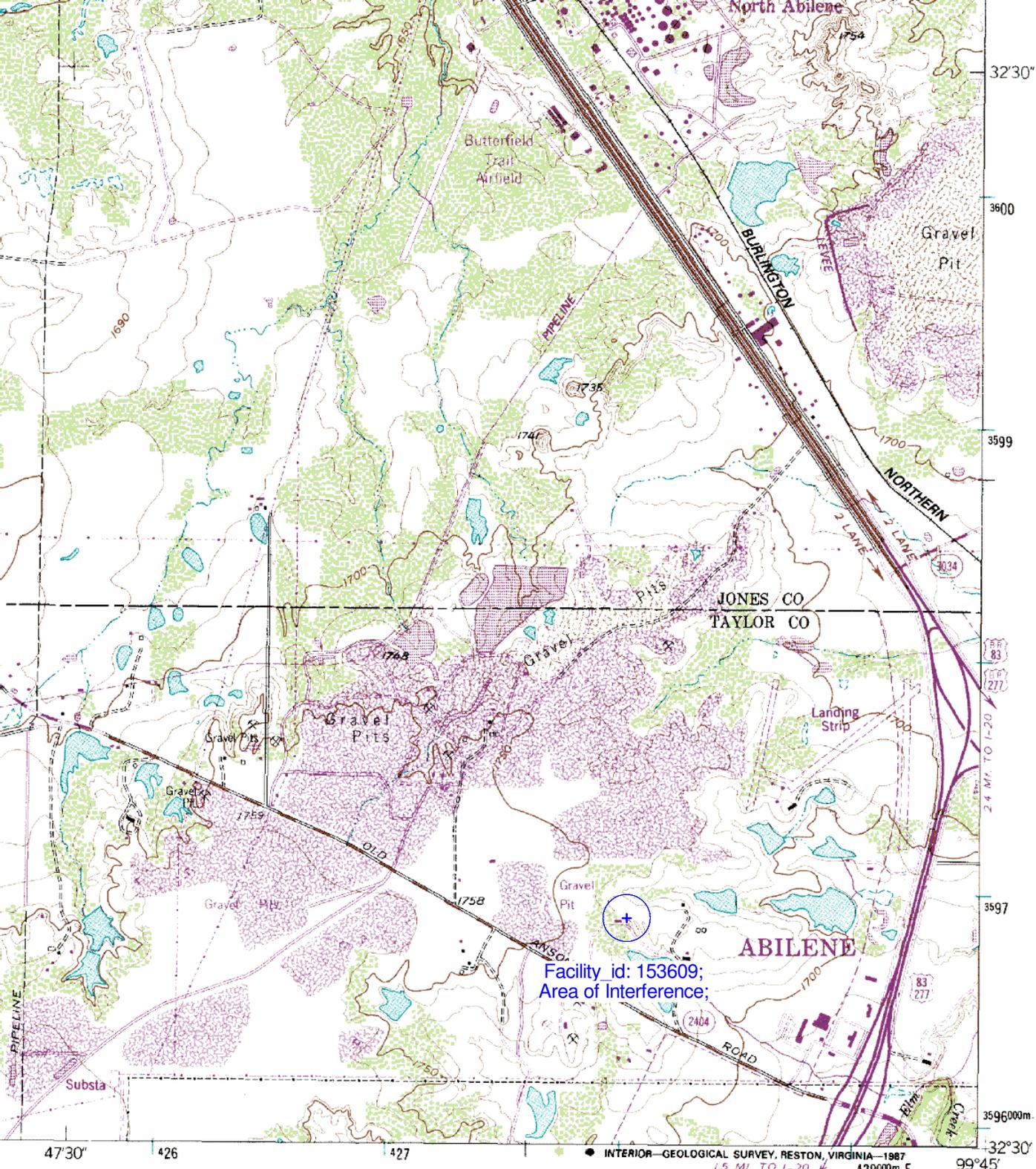
**Adjacent Channel Study
For Station NEW, Facility_id: 153609**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1291705	64656	Null	Null	KCDD	CUMULUS LICENSING LLC	C	HAMLIN	TX	USE	0	0	279	2	36.7	1.4918
1503246	64656	BPH	20120629ADB	KCDD	CUMULUS LICENSING LLC	C	HAMLIN	TX	CP	100	1004	279	2	37.4	1.4918
97551	64656	BLH	19870206KC	KCDD	CUMULUS LICENSING LLC	C0	HAMLIN	TX	LIC	98	851	279	2	37.4	1.4918
1207921	0	RM	coord-4	Null		C2	HAMLIN	TX	USE	0	0	283	2	49.6	0
1498001	190397	BNPH	20120529AHM	NEW	HISPANIC TARGET MEDIA INC.	C2	HAMLIN	TX	CP	50	631.4	283	2	71.9	0
1419446	0	RM	Coord-snc2	Null		A	SANTA ANNA	TX	VAC	0	0	282	1	91.5	0
292868	164193	Null	Null	DKAHA	SOUTH TEXAS FM INVESTMENTS, LLC	A	OLNEY	TX	USE	0	0	282	1	109.9	0
616070	0	RM	10601	Null		A	BLANKET	TX	VAC	0	0	284	3	119.6	0
1434066	189550	BNPH	20110630AHB	NEW	MCCUTCHEN, TRACY	A	BLANKET	TX	CP	5.1	599.5	284	3	119.8	0
575839	0	RM	10210	Null		A	COMANCHE	TX	VAC	0	0	280	1	128.8	0
1438247	164190	BLH	20110804ABM	KPTJ	CASTLE HOLDINGS, L.L.C.	C3	GRAPE CREEK	TX	LIC	25	711	283	2	141.2	0

Intermediate Frequencies (53 and 54 channels difference):

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
1520372	183341	BLH	20121129AOQ	KBGT	IN PHASE BROADCASTING, INC	C3	BUFFALO GAP	TX	LIC	7.2	788	227	54	27.6	15.6
1389337	7702	BLH	20100712AEG	KLXK	AFFILIATED MEDIA, INC. FCC TRUST	C3	BRECKENRIDGE	TX	LIC	12.5	512	228	53	83.5	71.5
300892	7702	Null	Null	KLXK	AFFILIATED MEDIA, INC. FCC TRUST	C3	BRECKENRIDGE	TX	USE	0	0	228	53	83.5	71.5
1512689	189518	BNPH	20110629BVH	KEPL	JOSEPH EPISCOPO	A	ROSCOE	TX	CP	6	806.2	228	53	83.2	73.2
1447945	189518	Null	Null	KEPL	JOSEPH EPISCOPO	A	ROSCOE	TX	USE	0	0	228	53	83.2	73.2



Facility id: 153609;
Area of Interference;

INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1987
1.5 MI. TO I-20
429000m. E.

ROAD CLASSIFICATION

- Primary highway, hard surface
- Secondary highway, hard surface
- Light-duty road, hard or improved surface
- Unimproved road
- Interstate Route
- U. S. Route
- State Route



QUADRANGLE LOCATION

3299-321

HAWLEY, TEX.
SE/4 HAWLEY 15' QUADRANGLE
32099-E7-TF-024

1957
PHOTOREVISED 1987
DMA 6049 III SE - SERIES V882

