

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 156843

Channel 277

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.

Page 6 of this exhibit is a contour map showing the 60 dB μ F(50,50) and 100dB μ F(50,10) contours for proposed short form amendment proposed NEW, Parker, AZ FAC# 156843, BNPFT-20030317JPH on channel 277 (this application) and proposed NEW, Parker, AZ FAC# 144628, BNPFT-20030317MFM on channel 279 which is being concurrently filed with this application.

Note: Both applications are filed on the same tower and therefore have congruent 60 dB μ and 100dB μ contours. These applications are filed concurrently as 2nd adjacents. As demonstrated in this exhibit, both applications qualify for 1204d population waivers; hence, both applications can be processed as expected singletons.

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
637037	BNPFT20030317MF M	NEW	100	100
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			100

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 **2.8 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").

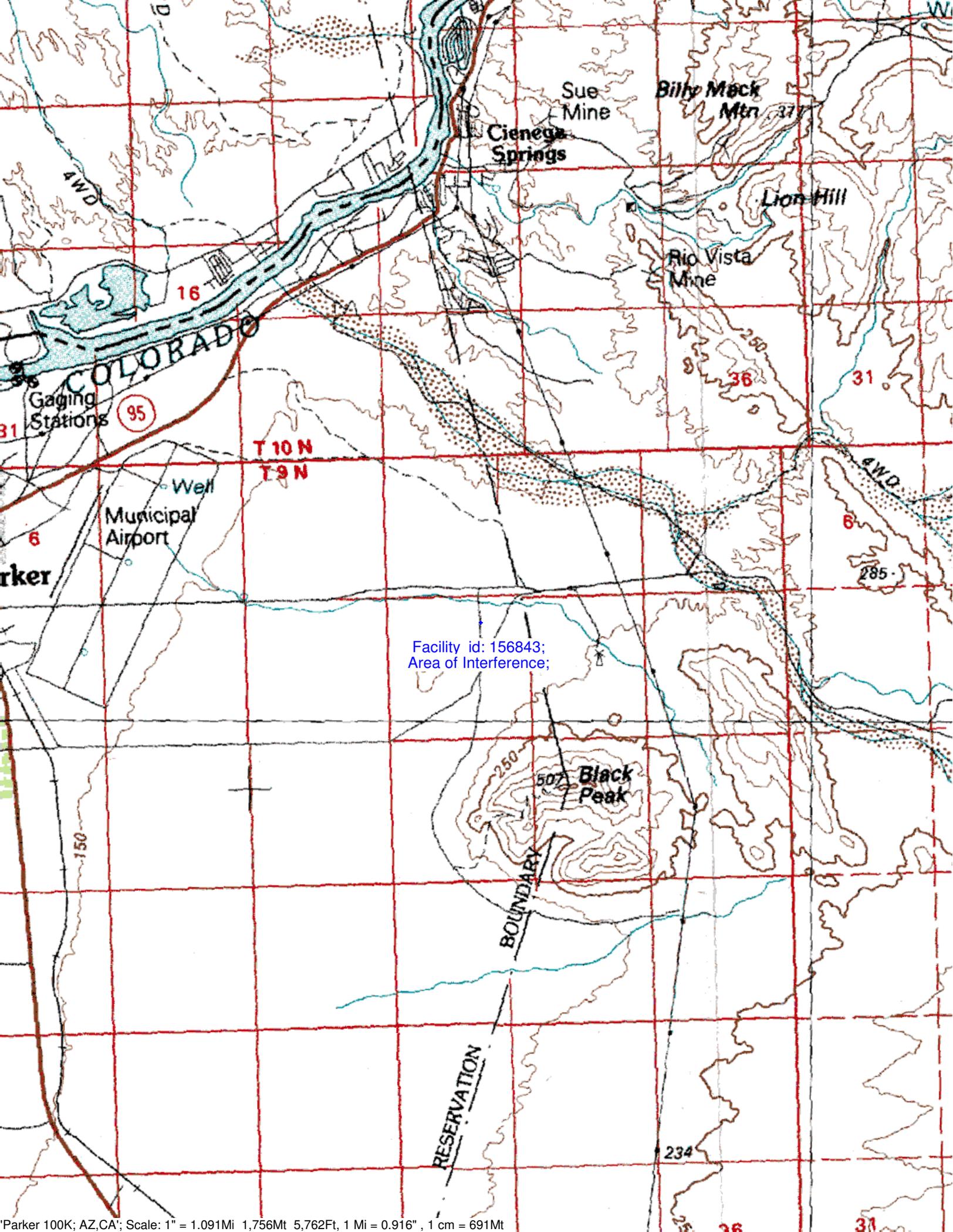
Note: There are no occupied buildings within the zone of predicted interference so, a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

Antenna Manufacturer: SCA
Antenna Model: FMV1
CORAGL: 6 m
Maximum ERP: 0.0155 kW
Interfering Contour: 140 dBμ
Max Int. Contour Distance: 2.8 m

Adjacent Channel Study
For Station NEW, Facility_id: 156843

Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Chan	Adj	Dist	Overlap
637037	144628	BNPFT-20030317MFM	NEW	RICK L. MURPHY	D	PARKER	AZ	APP	0.25	246	277	0	8	101.691
203978	67364	BLFT-19941110TI	K278AA	TOWER COMMUNICATIONS	D	LAKE HAVASU CIT	AZ	LIC	0.049	155	278	1	38.8	0
1252195	67363	BLFT-20080625ABR	K280DL	TOWER COMMUNICATIONS	D	LAKE HAVASU CIT	AZ	LIC	0.01	1432	280	3	47.5	0
1547656	157287	BNPFT-20130327AAE	NEW	DONALD F. HENDREN	D	QUARTZ SITE	AZ	APP	0.01	1008	279	2	63	0
1116102	124874	BLL-20060228AAJ	KCAN-LP	TRI-STATE CHRISTIAN RADIO	L1	NEEDLES	CA	LIC	0	204	276	1	86.4	0
1547640	156446	BNPFT-20130326AGT	K280FS	DONALD F. HENDREN	D	NOTHING	AZ	CP	0.25	1010	280	3	89.6	0
1478186	30448	BPFT-20101006ABC	K280EH	STEVEN M. GREELEY	D	KINGMAN	AZ	CP	0.01	2359	279	2	111.4	0
649626	156346	BNPFT-20030317HLE	NEW	DONALD F. HENDREN	D	PEACH SPRINGS	AZ	APP	0.25	2304	274	3	128	0
108639	966	BLFT-19880123TA	K280DD	STEVEN M. GREELEY	D	RIVIERA, ETC.	AZ	LIC	0.155	1468	280	3	133.9	0
265549	48738	BMLH-19980406KB	KLNZ	ENTRAVISION HOLDINGS, LLC	C	GLENDALE	AZ	LIC	48	1269	278	1	161.8	0



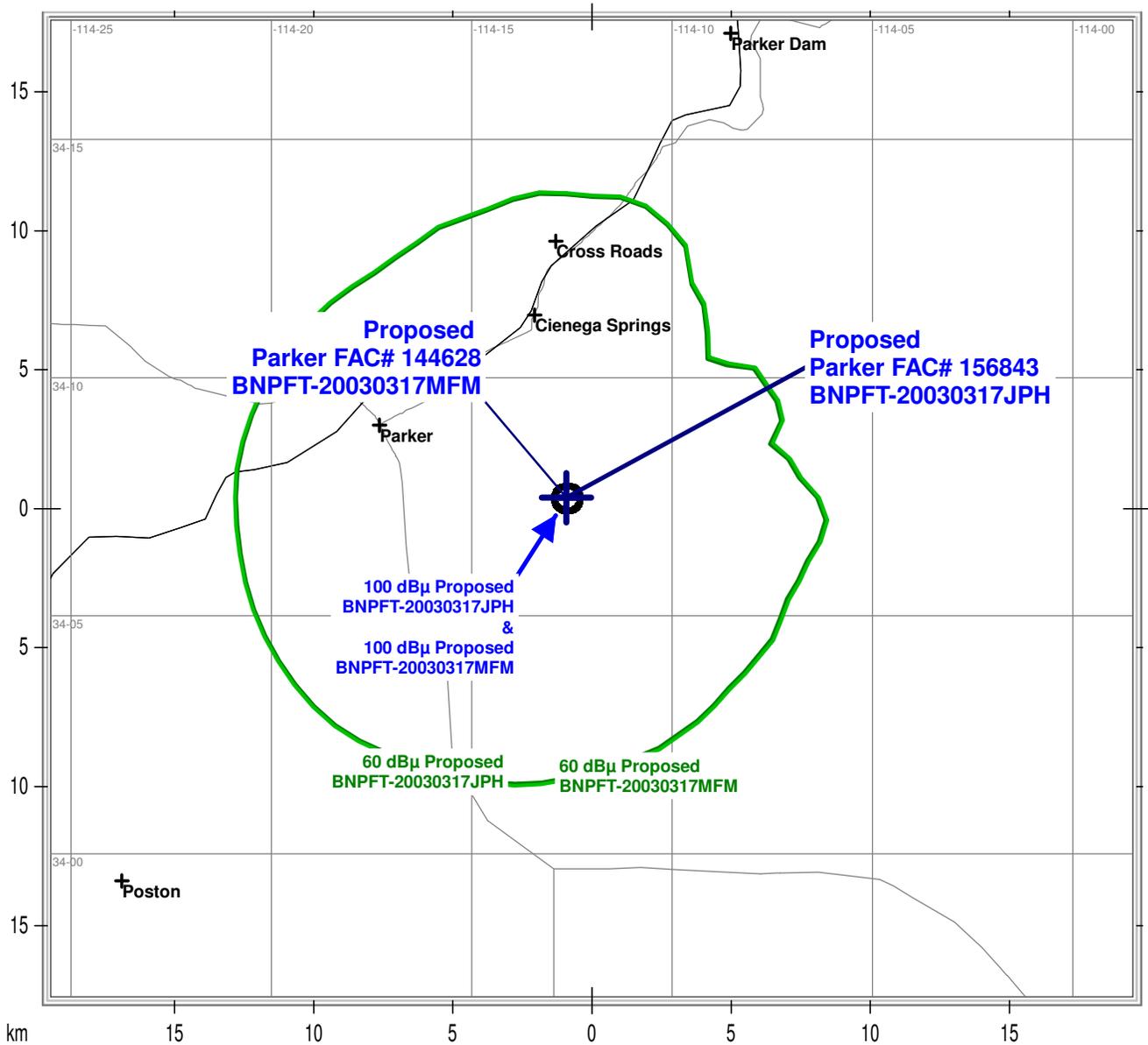
Facility id: 156843;
Area of Interference;



40 yds

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Proposed Amended Short Forms BNPFT-20030317MFM & BNPFT 20030317JPH



ASR# 1013279, 6m & 10m, 15.5W, Channels 277 & 279

State Borders Highways Lat/Lon Grid

Map Scale: 1:236893 1 cm = 2.37 km VIH Size: 35.13 x 38.89 km

Gene Wisniewski