

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 144136

Channel 247

### **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 structure within the zone of predicted interference is an unoccupied communications building 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1568199	BMLH20130820ABM	KUPD	145	100
203488	BMLH19941024KC	KMXP	135.6	126.3
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 **7 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 structure within the zone of predicted interference is an unoccupied communications building 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:** 38 m  
**Maximum ERP:** 0.099 kW  
**Interfering Contour:** 140 dBμ  
**Max Int. Contour Distance:** 7 m

**Adjacent Channel Study  
For Station K247CF, Facility\_id: 144136**

**Co-channel through third adjacent:**

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1568199	65166	BMLH-20130820ABM	KUPD	PHOENIX FCC LICENSE SUB, LLC	C	TEMPE	AZ	LIC	96	856	250	3	0.1	0.3054
203488	6361	BMLH-19941024KC	KMXP	CITICASTERS LICENSES, INC.	C	PHOENIX	AZ	LIC	98	834	245	2	0.4	0.3054
1203015	147044	BLFT-20070904ABA	K247BH	ADVANCE MINISTRIES, INC. D/B//	D	GOODYEAR	AZ	LIC	0.04	272	247	0	45.3	0
1062902	68566	BLH-20050413ABX	KMVA	RIVIERA BROADCASTING, LLC	C	DEWEY-HUMBOL	AZ	LIC	42	2382	248	1	104.2	0
1399096	11894	BLH-20100928ADE	KIKO-FM	1TV.COM, INC.	C2	CLAYPOOL	AZ	LIC	0.67	2352	247	0	114.8	0
1399096	11894	BLH-20100928ADE	KIKO-FM	1TV.COM, INC.	C2	CLAYPOOL	AZ	LIC	0.67	2352	247	0	114.8	0
1752990	11894	BSTA-20170313ABV	KIKO-FM	1TV.COM, INC.	C2	CLAYPOOL	AZ	APP	0.03	1190	247	0	117.1	0
496736	39734	BLH-20000421ABC	KSZR	RADIO LICENSE HOLDING CBC, I	A	ORO VALLEY	AZ	LIC	6	865	248	1	145.7	0
1694084	143516	BPFT-20151021AEF	K250AN	COCHISE BROADCASTING LLC	D	TUCSON	AZ	CP	0.25	1364	250	3	149.5	0
658540	24583	BLH-20030424AAM	KYWD	CAPSTAR TX, LLC	A	GREEN VALLEY	AZ	LIC	1.75	1227	246	1	175.6	0
1488389	190224	BNPH-20120221ACZ	NEW	GRENAX BROADCASTING II, LLC	C2	MUNDS PARK	AZ	APP	5	2622	246	1	188.9	0
1680413	24583	BPH-20141014ABL	KYWD	CAPSTAR TX, LLC	C3	GREEN VALLEY	AZ	CP	25	1063	246	1	189.5	0
644278	151203	BNPFT-20030317CF	NEW	RADIO ASSIST MINISTRY, INC.	D	SHOW LOW	AZ	APP	0.015	2385.2	247	0	218.9	0
1235791	177829	BNPH-20080225ABD	NEW	WILLIAM KONOPNICKI	C1	MCNARY	AZ	APP	100	2521	249	2	220.4	0
1198753	150097	BLFT-20070806AAT	K246BI	RADIO ASSIST MINISTRY, INC.	D	WINSLOW	AZ	LIC	0.025	1483	246	1	226.6	0



