

[Exhibit 13]

## **Non-Interference Compliance**

Regarding Facility id 145133

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 $\mu$  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.

## 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>
1327092	BLH20090820ABV	KJJJ	71.1	71.1
1352536	BLFTB20100108ABT	KJJJ-FM2	82.6	74.4
1601224	BLH20131118BJB	KXMK	61.9	61.9
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>61.9</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 **61.9 dBμ**, this makes the proposed translator's worst-case interfering contour **101.9 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **891.2 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 and an unoccupied communications building and an unoccupied storage shed so 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.**

**Antenna Manufacturer:** SCA  
**Antenna Model:** YA7-FML(V) @ 330°  
**CORAGL:** 12 m  
**Maximum ERP:** 0.25 kW  
**Interfering Contour:** 101.9 dBμ  
**Max Int. Contour Distance:** 891.2 m

## Adjacent Channel Study For Station K270CI, Facility\_id: 145133

### Co-channel through third adjacent:

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Char	Adj	Dist	Overlap
1352536	181248	BLFTB-20100108ABT	KJJJ-FM2	STEVEN M. GREELEY	D	KINGMAN	AZ	LIC	0.5	2352	272	2	17.1	0.2399
1601224	183358	BLH-20131118BJB	KXMK	COCHISE MEDIA LICENSES, LLC	C2	OATMAN	AZ	LIC	2.2	1352	267	3	34.8	0.2399
1327092	63410	BLH-20090820ABV	KJJJ	STEVEN M. GREELEY	C1	LAUGHLIN	NV	LIC	17	1367	272	2	34.8	0.2399
174349	9036	BLFT-19920608TA	K268AC	CAMERON BROADCASTING, INC.	D	KINGMAN	AZ	LIC	0.01	2569	268	2	18	0.0608
1742341	156670	BLFT-20161018AAU	K269GB	AIRCRAFT STORAGE SOLUTION:	D	CALNEVAIR	NV	LIC	0.25	1333	269	1	34.8	0
1754312	156670	BPFT-20170403AAO	K269GB	AIRCRAFT STORAGE SOLUTION:	D	CALNEVAIR	NV	CP	0.001	835	269	1	36.4	0
1747351	156491	BLFT-20161219ACO	K267CK	AIRCRAFT STORAGE SOLUTION:	D	KINGMAN	AZ	LIC	0.09	642	267	3	61.1	0
1352532	178460	BLFTB-20100108ABL	KJJJ-FM1	STEVEN M. GREELEY	D	LAKE HAVASU CI'	AZ	LIC	1	1442	272	2	73.1	0
1705372	178460	BPFTB-20151123AEF	KJJJ-FM1	STEVEN M. GREELEY	D	LAKE HAVASU CI'	AZ	CP	0.6	1437	272	2	73.1	0
1761018	30450	BPFT-20170714AAO	K270AD	DONALD F. HENDREN	D	LAKE HAVASU CI'	AZ	CP	0.099	1438	270	0	73.1	0
1697992	198736	BNPH-20150911AHS	NEW	RIVER RAT RADIO, LLC	C2	BAGDAD	AZ	CP	28	940	269	1	87.2	0
1487019	55503	BLH-20120214ACK	KWID	LOTUS BROADCASTING CORP.	C0	LAS VEGAS	NV	LIC	47	1370	270	0	123	0

### Intermediate Frequencies (53 and 54 channels difference):

App_id	Fac_id	File_Number	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
114473	67647	BLFT-19880623TA	K217BE	ADVANCED MINISTRIES, INC. D/E	D	KINGMAN	AZ	LIC	0.165	2352	217	53	16.9	6.9
1035032	48504	BLED-20041214AES	KNLB	NEW LIFE CHRISTIAN SCHOOL	C3	LAKE HAVASU CI'	AZ	LIC	8	650	216	54	80.7	68.7



