

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 149509

Channel 248

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: There are no occupied buildings nor major roads within the zone of predicted interference which is located in an oil field 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
1113673	BMLH20050324ADQ	KODM	67.1	67.1
1132915	BLH20060613ACA	KMCM	70.8	70.3
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				67.1

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 **67.1 dB μ** , this makes the proposed translator's worst-case interfering contour **107.1 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **489.7 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"). Hence, 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.

Note: There are no occupied buildings nor major roads within the zone of predicted interference which is located in an oil field 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: RFT
Antenna Model: FM-FD
CORAGL: 9 m
Maximum ERP: 0.25 kW
Interfering Contour: 107.1 dB μ
Max Int. Contour Distance: 489.7 m

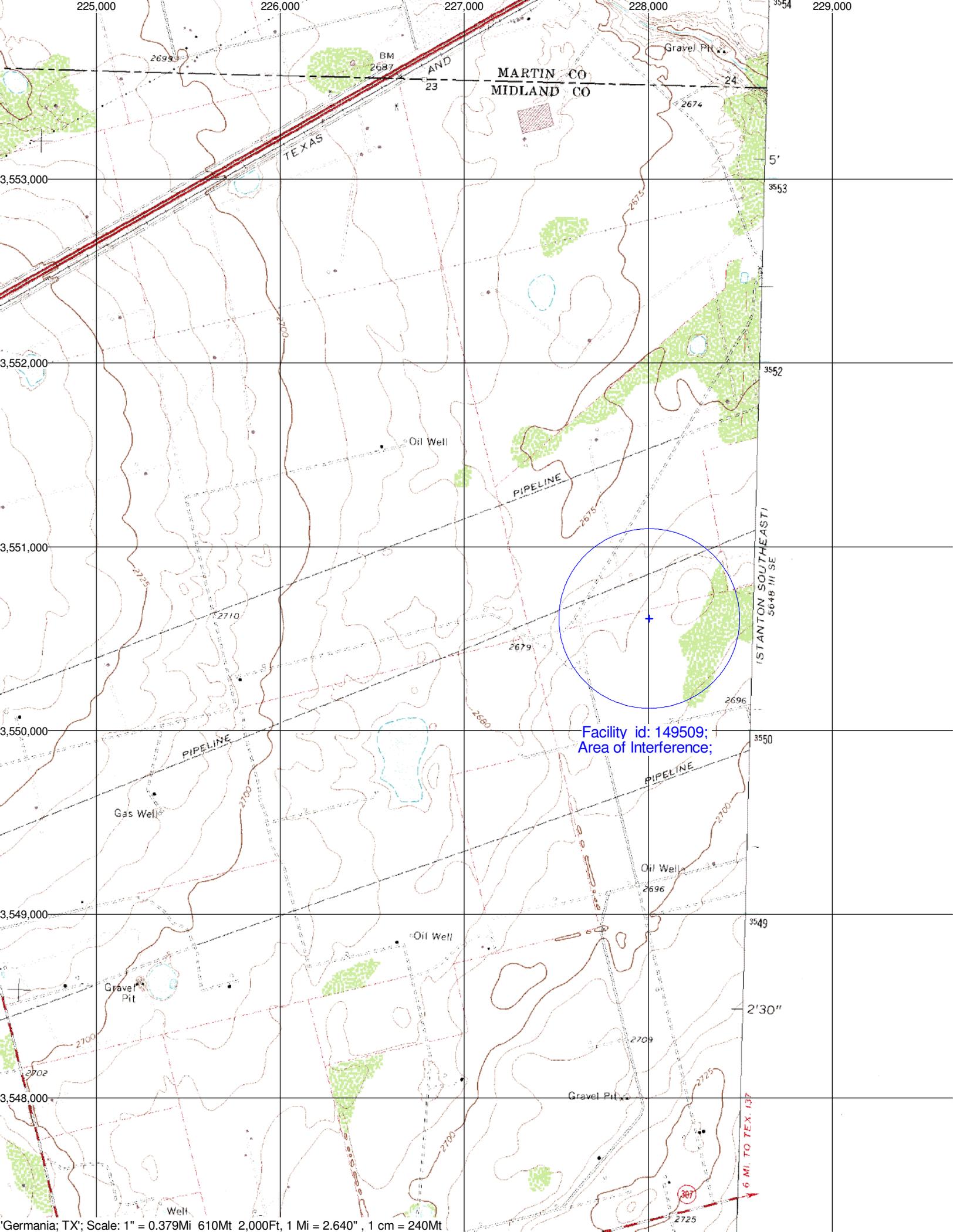
Adjacent Channel Study For Station K248AR, Facility_id: 149509

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1132915	65306	BLH	20060613ACA	KMCM	TOWNSQUARE MEDIA ODESSA-MIDLAND LICEI	C1	ODESSA	TX	LIC	100	1025	245	3	38.3	1.4918
292488	65306	Null	Null	KMCM	TOWNSQUARE MEDIA ODESSA-MIDLAND LICEI	C1	ODESSA	TX	USE	0	0	245	3	38.4	1.4918
1113673	48435	BMLH	20050324ADQ	KODM	CUMULUS LICENSING LLC	C1	ODESSA	TX	LIC	100	975	250	2	40.8	1.4918
292911	48435	Null	Null	KODM	CUMULUS LICENSING LLC	C1	ODESSA	TX	USE	0	0	250	2	40.9	1.4918
1172388	140699	BLFT	20070208AAP	K247AZ	EDUCATIONAL MEDIA FOUNDATION	D	SAND SPRINGS	TX	LIC	0.14	872	247	1	44	0
588039	0	RM	10380	Null		A	O'DONNELL	TX	VAC	0	0	249	1	97.9	0
592305	0	RM	10469	Null		A	BIG LAKE	TX	USE	0	0	246	2	108.9	0
1433483	189530	BNPH	20110630AIX	NEW	PANTHER COMMUNICATIONS LLC	A	BIG LAKE	TX	CP	6	914	246	2	110.5	0
1424902	76852	Null	Null	KGEE	CUMULUS LICENSING LLC	C1	PECOS	TX	USE	0	0	247	1	137.8	0
1424447	76852	BPH	20110422ABZ	KGEE	CUMULUS LICENSING LLC	C1	PECOS	TX	CP	100	930	247	1	137.8	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
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MARTIN CO
MIDLAND CO

TEXAS

Facility id: 149509;
Area of Interference;



Google earth

feet
km



4000

1

