

Non-Interference Compliance

Regarding Facility id 154842

Channel 254

Description of Exhibit 12 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 dBμ 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.

Since the proposed translator is within 320 km of the Mexican border, 47 C.F.R. § 74.1235(d) has been taken into account and this applicant certifies that in the direction of the Mexican border, the proposed translator's 60 dBμ F(50,50) contour does not lie within 116.3 km of the Mexican border. This application is therefore in full compliance with 47 C.F.R. § 74.1235(d)(2), which states that for translators between 125 and 320 km from the border, "in no event shall the location of the 60 dBμ contour lie within 116.3 km of the Mexican border," and hence complies with 47 C.F.R. § 74.1204(h).

Note: The quadrangle indicates the presence of a county road in the area of interference. It is apparent that this is not a major road, e.g. interstate highway, as described in the Living Way decision and therefore "lack of population" is demonstrated.

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
594596	BLH20020220AAD	KRYS-FM	70.1	70.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				70.1

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 **70.1 dBμ**, this makes the proposed translator's worst-case interfering contour **110.1 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **219.3 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: The quadrangle indicates the presence of a county road in the area of interference. It is apparent that this is not a major road, e.g. interstate highway, as described in the Living Way decision and therefore "lack of population" is demonstrated.

Antenna Manufacturer:	NIC
Antenna Model:	BKG77
CORAGL:	94 m
Maximum ERP:	0.1 kW
Interfering Contour:	110.1 dBμ
Max Int. Contour Distance:	219.3 m

Adjacent Channel Study **For Station K254AZ, Facility_id: 154842**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
594596	55162	BLH	20020220AAD	KRYS-FM	CAPSTAR TX LIMITED PARTNERSHIP	C1	CORPUS CHRISTI	TX	LIC	100	302	256	2	48.6	0.5967
242226	12170	BLH	19970306KF	KLHB	COASTAL DIGITAL BROADCASTING, L.P.	C2	ODEM	TX	LIC	50	137	252	2	67.2	0
631228	140029	BNPFT	20030314BMP	NEW	EDUCATIONAL MEDIA FOUNDATION	D	BEEVILLE	TX	APP	0.075	255	251	3	88.9	0
48848	19544	BLH	19821108BB	KRRG	GUERRA ENTERPRISES	C1	LAREDO	TX	LIC	96	362	251	3	139.3	0
299947	95454	Null	Null	XHNKFM		B	NUEVO LAREDO	TA		9.55	0	257	3	139.4	0
293486	95454	Null	Null	XHNKFM		B	NUEVO LAREDO	TA		0	0	257	3	139.4	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
1052946	91069	BPED	19980701MB	KKWV	BROADCASTING FOR THE CHALLENGED, INC.	C2	ARANSAS PASS	TX	CP	45	145	201	53	99.2	84.2

