

[Exhibit 12]

## **Non-Interference Compliance**

Regarding FCC File Number: BNPFT-20030317KEA

Channel: 250

### **Description of Exhibit 12 Contents**

This exhibit demonstrates that the proposed facility complies with contour overlap and interference protection provisions in all the applicable rule sections and that this application for a construction permit is in full compliance with 47 CFR 74.1204.

Page 2 of this exhibit is an explanation of the tabulated data, which is included as evidence on page 4 of this exhibit.

Page 3 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference protection provisions based on 47 CFR 74.1204(d), which states:

*"an 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."*

In addition, page 3 includes a tabulation of the second and third adjacent stations which this application is required to protect and the field strengths of those stations in the vicinity of the proposed translator. The field strengths given were based on contours predicted using FCC contour algorithms and 3 arc second terrain data.

**Let it be noted that should any actual real world interference occur, the applicant certifies that it will promptly suspend operation of this translator in accordance with 47 CFR 74.1203.**

Page 4 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application had to consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

Page 5 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 min quadrangle at full scale with the calculated area of interference overlayed. 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 a free-space calculation (see FCC 98-117, Appendix A, pg. 41 for reference to the equation used).

## Explanation of Frequency Finder Results

The interference analysis for this application was performed using the "Frequency Finder" module in RadioSoft's Comstudy, version 2.2.

Frequency Finder analyzes data taken directly from the FCC's FM database and looks for prohibited overlap with contours of adjacent stations and prohibited proximity to stations 53 or 54 channels from the proposed station (IF) using 3 arc second terrain data and the FCC's contour algorithms. The results tabulated are the stations returned from that analysis. (Note: Because Comstudy was looking at the FCC's FM database, it took into account the proposed translator when doing the analysis and returned it in the tabulated results. For the sake of simplicity, that record has been deleted from all tabulated results.)

The first several columns of the table are self-explanatory. They give various data on the stations in question. The column labeled "Clr" gives the proposed translator's "clearance" with respect to the tabulated station, either in dB or km. The values listed with no units are given in km and are for stations located on an IF to the proposed site's channel.

**A negative value in the "Clr" column does NOT necessarily represent prohibited contour overlap, as explained below.**

A negative value listed in the "Clr" column would indicate either overlap of interference and protected contours or prohibited proximity to an IF station except in the following situations:

- Since the proposed station's Effective Radiated Power (ERP) is 10 watts, a negative value in km (no units listed in the table) does not represent a violation of the CFR, according to 47 CFR 1204(g), which states that "FM translator stations and booster stations operating with less than 100 watts ERP will be treated as class D stations and will not be subject to intermediate frequency separation requirements."

- A second or third adjacent LP100 station cannot represent a violation of the CFR, as 47 CFR 74.1204(a)(4) requires protection of only co-channel and first adjacent LP100 stations.

- 47 CFR 74.1204(a) requires only the protection of "AUTHORIZED commercial or noncommercial educational FM broadcast stations, FM translators, ..." Any entry with a status listed as "RSV," "USE" or "APP" does not represent an authorized station and therefore is not protected under 47 CFR 74.1204. The one exception is the case of LP100 applications. The note to 47 CFR 74.1204(a)(4) states that "LPFM applications and permits that have not yet been licensed must be considered as operating with the maximum permitted facilities." Therefore, any first adjacent or co-channel LP100 station, no matter the status, is protected.

- Entries highlighted in red are those stations where there is overlap of predicted contours and lack of population has been demonstrated within the area of interference.

## Compliance with 47 CFR 74.1204(d)

The proposed translator's Maximum Effective Radiated Power (ERP) is 0.01kW at 230 meters above ground level. According to 47 CFR, 74.1204(a), the desired to undesired ratio between 2nd/3rd adjacent stations is 40dB, making the proposed translator's interfering contour 111.4dBu F(50,10).

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), this proposed translator's F(50,10) interference contour was calculated and the maximum horizontal plane was plotted on the pertinent portion of a USGS quadrangle (page 5 of this exhibit). However, the proposed translator's area of interference extends a maximum of 59.7 meters from the transmit antenna. Since the translator's center of radiation is 230 meters above ground level, the area of interference will be at least 170.3 meters above tower ground level (TGL) at the lowest point. The applicant has taken into account USGS quadrangles and relevant aerial photography in stating that no structures, except possibly tower support structures, puncture the proposed area of interference. Hence, in accordance with 47 CFR 74.1204(d) and the clarification provided by the FCC in the decision Re: Living Way Ministries (FCC 02-244), there is a lack of population within the proposed area of interference and therefore this application is in full compliance with 47 CFR 74.1204.

CORAGL: 230m

Maximum ERP: 0.01kW

F(50,10) Interfering Contour: 111.4dBu

F(50,10) Max Distance: 59.7m

Antenna Manufacturer: SWR

Antenna Model: FM1

**F(50,10) Clearance above TGL: 170.3m**

The F(50,50) signal strength of all relevant second and third adjacent stations have been examined, and are tabulated below. Column three shows the station's signal level at the proposed translator's tower site, and column four gives the minimum value within the entire proposed translator's standard F(50,10) contour (100 dBu for most classes, 94 dBu for class B's, 97 dBu for class B1's). For signal levels too great to determine, 999 was entered. The minimum F(50,50) contour within the proposed translator's standard F(50,10) contour was used to calculate the proposed translator's interference contour, thereby assuring a minimum undesired-to-desired ratio of 40dB for all relevant adjacent stations, as required in 47 CFR, 74.1204(a).

FCC File Number	Call Sign	F(50,50) Contour at Tower	Min. F(50,50) Contour
BLH19901121KD	KQYB	71.7dBu	71.4dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			<b>71.4dBu</b>

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
KQYB	MN	SPRING GROVE	252	50000	FAMILY RADIO, INC.	BPH20030715ABJ	C2	APP	30.51	-12.90 dB	63804
KQYB	MN	SPRING GROVE	252	33000	FAMILY RADIO, INC.	BLH19901121KD	C2	LIC	34.22	-11.58 dB	63804
KNXR	MN	ROCHESTER	248	100000	UNITED AUDIO CORPORATION	BLH19990505KB	C	LIC	82.35	4.49 dB	68823
NEW	IA	DECORAH	250	62	RADIO ASSIST MINISTRY, INC.	BNPFT20030317HEG	D	APP	71.04	7.12 dB	152179
WISM-FM	WI	ALTOONA	251	25000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BPH20000128ADA	C3	CP	108.42	24.58 dB	1130
WSPT-FM	WI	STEVENS POINT	250	100000	AMERICUS COMMUNICATIONS, LLC	BLH19961015KB	C1	LIC	163.56	24.34 dB	2104
WGLR-FM	WI	LANCASTER	249	11500	QUEENB RADIO WISCONSIN, INC.	BMPH19981125IB	C3	CP MOI	117.69	28.69 dB	33052
WGLR-FM	WI	LANCASTER	249	11500	QUEENB RADIO WISCONSIN, INC.	BLH20000119AAI	C3	LIC	117.69	28.69 dB	33052
KQYB	MN	SPRING GROVE	252	0	FAMILY RADIO, INC.		C2	USE	32.92	29.40 dB	63804
WMGN	WI	MADISON	251	38000	MID-WEST MANAGEMENT, INC.	BLH19830502AE	B	LIC	186.36	30.34 dB	41900
KCMR	IA	MASON CITY	250	6000	TLC BROADCASTING CORPORATION	BLH19920121KB	A	LIC	166.32	31.87 dB	67199
WISM-FM	WI	ALTOONA	251	10000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BMLH20010312AAA	C3	LIC	108.33	31.93 dB	1130
KTIS-FM	MN	MINNEAPOLIS	253	100000	NORTHWESTERN COLLEGE	BMLD20030304AAJ	C	LIC	197.35	34.79 dB	49787
WGLR-FM	WI	LANCASTER	249	3480	QUEENB RADIO WISCONSIN, INC.	BXMLH20000214AAU	C3	LIC	121.38	36.99 dB	33052
WSPT-FM	WI	STEVENS POINT	250	0	AMERICUS COMMUNICATIONS, LLC		C1	USE	163.56	36.23 dB	2104



