

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 155068

Channel 250

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 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 a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by the U.S. Geological Survey's National Aerial Photography Program. It has been included to provide clarification of the nature of the buildings in the vicinity.

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
154521	BLH19901121KD	KQYB	71.7	71.5
971437	BPH20030715ABJ	KQYB	71.9	71.7
997581	BMPH20040608AAY	KQYB	78.8	78.6
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				71.5

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 **71.5 dBμ**, this makes the proposed translator's worst-case interfering contour **111.5 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **59 m** from the transmit antenna.

The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). However, since the area of interference extends a maximum of **59 m** from the transmit antenna and the transmit antenna is **160 m** above tower ground level (TGL), the area of interference will be at least **101 m** above 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 area of interference. 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.

Antenna Manufacturer: SWR
Antenna Model: FM1
CORAGL: 160 m
Maximum ERP: 0.01 kW
Interfering Contour: 111.5 dBμ
Max Int. Contour Distance: 59 m
Min Ground Clearance: 101 m

**Adjacent Channel Study
For Station NEW, Facility_id: 155068**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
997581	63804	BMPH	20040608AAY	KQYB	FAMILY RADIO, INC.	C2	SPRING GROVE	MN	APP	14.1	598	252	2	20.9	0.0597
971437	63804	BPH	20030715ABJ	KQYB	FAMILY RADIO, INC.	C2	SPRING GROVE	MN	CP	50	459	252	2	30.4	0.0597
154521	63804	BLH	19901121KD	KQYB	MARATHON MEDIA OF MINNESOTA, L.P., A	C2	SPRING GROVE	MN	LIC	33	506	252	2	34.2	0.0597
681227	152179	BNPFT	20030825AEW	K250AH	RADIO ASSIST MINISTRY, INC.	D	DECORAH	IA	CP	0.004	515	250	0	71	0
284797	68823	BLH	19990505KB	KNXR	UNITED AUDIO CORPORATION	C	ROCHESTER	MN	LIC	100	671	248	2	82.1	0
555401	1130	BMLH	20010312AAA	WISM-FM	ALPENGLOW COMMUNICATIONS, INC.	C3	ALTOONA	WI	LIC	10	331	251	1	108.4	0
277576	33052	BMPH	19981125IB	WGLR-FM	QUEENB RADIO WISCONSIN, INC.	C3	LANCASTER	WI	CP MOD	11.5	443	249	1	117.7	0
431312	33052	BLH	20000119AAI	WGLR-FM	QUEENB RADIO WISCONSIN, INC.	C3	LANCASTER	WI	LIC	11.5	443	249	1	121.4	0



50'
4854
4853
4851
4850
47'30"
4849
4848

7771 IV SW
(MOUND PRAIRIE)

Facility id: 155068;
Area of Interference;

