

[Exhibit 12]

## **Non-Interference Compliance**

Regarding FCC File Number: BNPFT-20030317DDD

Channel: 282

### **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 5 of this exhibit.

Pages 3 and 4 of this exhibit contain 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 4 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.**

Pages 5 through 7 include a plot and a tabulation of the vertical radiation pattern for the antenna used in this application. These were provided by the antenna manufacturer.

Page 8 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 9 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).

Page 10 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.

At the end of this exhibit are plots of the protected and interference contours of the proposed translator and any other stations from which the applicant is willing to accept interference. These contours were plotted using 3 arc second terrain data for the highest degree of accuracy possible.

## 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.

- Entries highlighted in blue are those that were returned in the results because of interference caused to this proposed translator. Contours were plotted by RadioSoft's Comstudy, version 2.2, using the FCC's contour algorithms, and these are included at the end of this exhibit showing that interference is caused only to the proposed translator and not by it.

## Compliance with 47 CFR 74.1204(d)

The proposed translator's Maximum Effective Radiated Power (ERP) is 0.01kW at 140 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 104.9dBu F(50,10). (See the next page for more discussion on the determination of the signal strength of the proposed translator's area of interference.)

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), the 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 6 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated below at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free space calculation that neglects any loss due to reflection (equation referenced in FCC 98-117, Appendix A, pg. 41), the vertical ground clearance of the proposed application's F(50,10) interference contour at each angle has been tabulated. As shown below, the area of interference clears the ground by 94.5 meters 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.

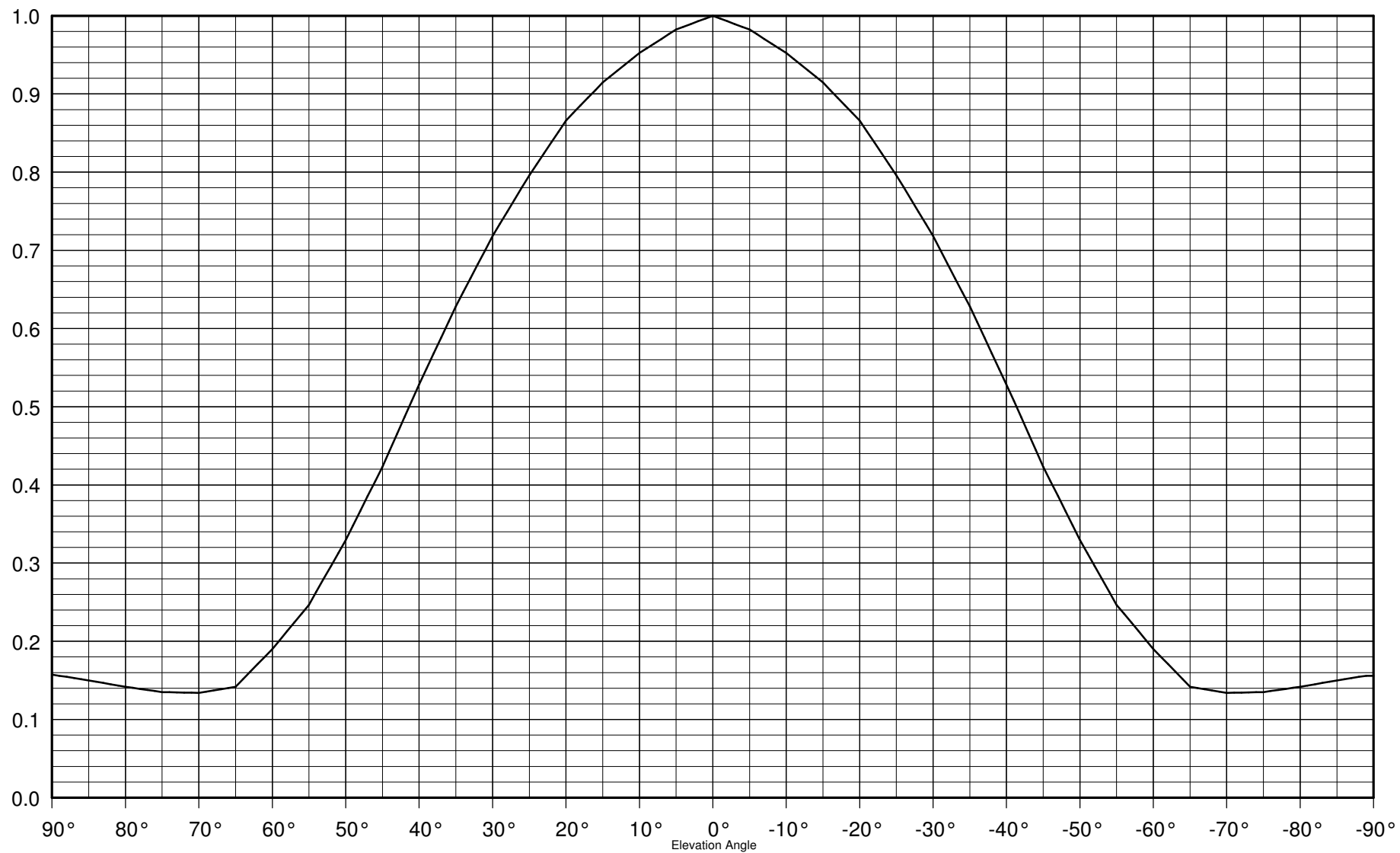
<b>Antenna Manufacturer:</b>	SCA	<b>Maximum ERP:</b>	10 watts
<b>Antenna Model Number:</b>	CA5-FM/CP/RM	<b>CORAGL:</b>	140 m
<b>Antenna Rotation:</b>	290	<b>F(50,10) Contour:</b>	104.9 dBu

Depression Angle (from COR)	Antenna Relative Field	ERP (watts)	Distance to F(50,10) Interfering Contour from Antenna (m)	Horizontal Distance of F(50,10) Interfering Contour from Tower (m)	Vert. Clearance of F(50,10) Interfering Contour above TGL (m)
5	0.982	9.64	123.9	123.4	129.2
10	0.952	9.06	120.1	118.3	119.1
15	0.915	8.37	115.5	111.5	110.1
20	0.866	7.50	109.3	102.7	102.6
25	0.796	6.34	100.4	91.0	97.6
30	0.718	5.16	90.6	78.5	94.7
35	0.628	3.94	79.2	64.9	94.5
40	0.528	2.79	66.6	51.0	97.2
45	0.423	1.79	53.4	37.7	102.3
50	0.329	1.08	41.5	26.7	108.2
55	0.247	0.61	31.2	17.9	114.5
60	0.19	0.36	24.0	12.0	119.2
65	0.142	0.20	17.9	7.6	123.8
70	0.134	0.18	16.9	5.8	124.1
75	0.135	0.18	17.0	4.4	123.5
80	0.142	0.20	17.9	3.1	122.4
85	0.15	0.23	18.9	1.6	121.1
90	0.157	0.25	19.8	0.0	120.2

Minimum F(50,10) Clearance above TGL **94.5 m**

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
BPH20030925AQU	WSIS	87.2dBu	86.6dBu
BLH19991015ACI	WSIS	65dBu	64.9dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			<b>64.9dBu</b>



CA5-FM/CP/RM FM CP Yagi Antenna

Max Gain: 6.0 dBd

Power-x: 3.98

Circular Polarization

Vertical Plane Pattern



Post Office Box 4580 Phone:(541) 779-6500  
Medford, OR 97501 (USA) Fax:(541) 779-3991  
<http://www.kathrein-scala.com>

CA5-FM/CP/RM FM CP Yagi Antenna  
 Max Gain: 6.0 dBd  
 Power-x: 3.98  
 Circular Polarization  
 Vertical Plane Pattern



Angle	Field	Rel dB	PWR mult	dBd	Angle	Field	Rel dB	PWR mult	dBd
90	.157	-16.06	.10	-10.06	45	.423	-7.47	.71	-1.47
89	.156	-16.14	.10	-10.14	44	.444	-7.05	.79	-1.05
88	.154	-16.23	.09	-10.23	43	.465	-6.64	.86	-.64
87	.153	-16.31	.09	-10.31	42	.486	-6.26	.94	-.26
86	.151	-16.39	.09	-10.39	41	.507	-5.89	1.02	.11
85	.150	-16.48	.09	-10.48	40	.528	-5.54	1.11	.46
84	.148	-16.58	.09	-10.58	39	.548	-5.22	1.20	.78
83	.147	-16.67	.09	-10.67	38	.568	-4.91	1.29	1.09
82	.145	-16.77	.08	-10.77	37	.588	-4.61	1.38	1.39
81	.143	-16.87	.08	-10.87	36	.608	-4.32	1.47	1.68
80	.142	-16.97	.08	-10.97	35	.628	-4.04	1.57	1.96
79	.140	-17.06	.08	-11.06	34	.646	-3.79	1.66	2.21
78	.139	-17.14	.08	-11.14	33	.664	-3.55	1.76	2.45
77	.138	-17.22	.08	-11.22	32	.682	-3.32	1.85	2.68
76	.136	-17.31	.07	-11.31	31	.700	-3.09	1.95	2.91
75	.135	-17.39	.07	-11.39	30	.718	-2.87	2.05	3.13
74	.135	-17.41	.07	-11.41	29	.734	-2.69	2.14	3.31
73	.135	-17.42	.07	-11.42	28	.749	-2.51	2.24	3.49
72	.134	-17.43	.07	-11.43	27	.765	-2.33	2.33	3.67
71	.134	-17.44	.07	-11.44	26	.780	-2.15	2.42	3.85
70	.134	-17.46	.07	-11.46	25	.796	-1.98	2.52	4.02
69	.136	-17.36	.07	-11.36	24	.810	-1.83	2.61	4.17
68	.137	-17.26	.07	-11.26	23	.824	-1.68	2.70	4.32
67	.139	-17.16	.08	-11.16	22	.838	-1.54	2.80	4.46
66	.140	-17.07	.08	-11.07	21	.852	-1.39	2.89	4.61
65	.142	-16.97	.08	-10.97	20	.866	-1.25	2.99	4.75
64	.151	-16.40	.09	-10.40	19	.876	-1.15	3.05	4.85
63	.161	-15.86	.10	-9.86	18	.885	-1.06	3.12	4.94
62	.171	-15.36	.12	-9.36	17	.895	-.96	3.19	5.04
61	.180	-14.88	.13	-8.88	16	.905	-.87	3.26	5.13
60	.190	-14.42	.14	-8.42	15	.915	-.77	3.33	5.23
59	.201	-13.92	.16	-7.92	14	.922	-.70	3.39	5.30
58	.213	-13.45	.18	-7.45	13	.930	-.63	3.44	5.37
57	.224	-13.00	.20	-7.00	12	.937	-.56	3.50	5.44
56	.235	-12.57	.22	-6.57	11	.945	-.49	3.55	5.51
55	.247	-12.16	.24	-6.16	10	.952	-.42	3.61	5.58
54	.263	-11.59	.28	-5.59	9	.958	-.37	3.66	5.63
53	.280	-11.07	.31	-5.07	8	.964	-.32	3.70	5.68
52	.296	-10.57	.35	-4.57	7	.970	-.26	3.75	5.74
51	.313	-10.09	.39	-4.09	6	.976	-.21	3.79	5.79
50	.329	-9.65	.43	-3.65	5	.982	-.15	3.84	5.85
49	.348	-9.17	.48	-3.17	4	.986	-.12	3.87	5.88
48	.367	-8.71	.54	-2.71	3	.989	-.09	3.90	5.91
47	.386	-8.27	.59	-2.27	2	.993	-.06	3.93	5.94
46	.405	-7.86	.65	-1.86	1	.996	-.03	3.95	5.97

CAS-FM/CP/RM FM CP Yagi Antenna  
 Max Gain: 6.0 dBd  
 Power-x: 3.98  
 Circular Polarization  
 Vertical Plane Pattern



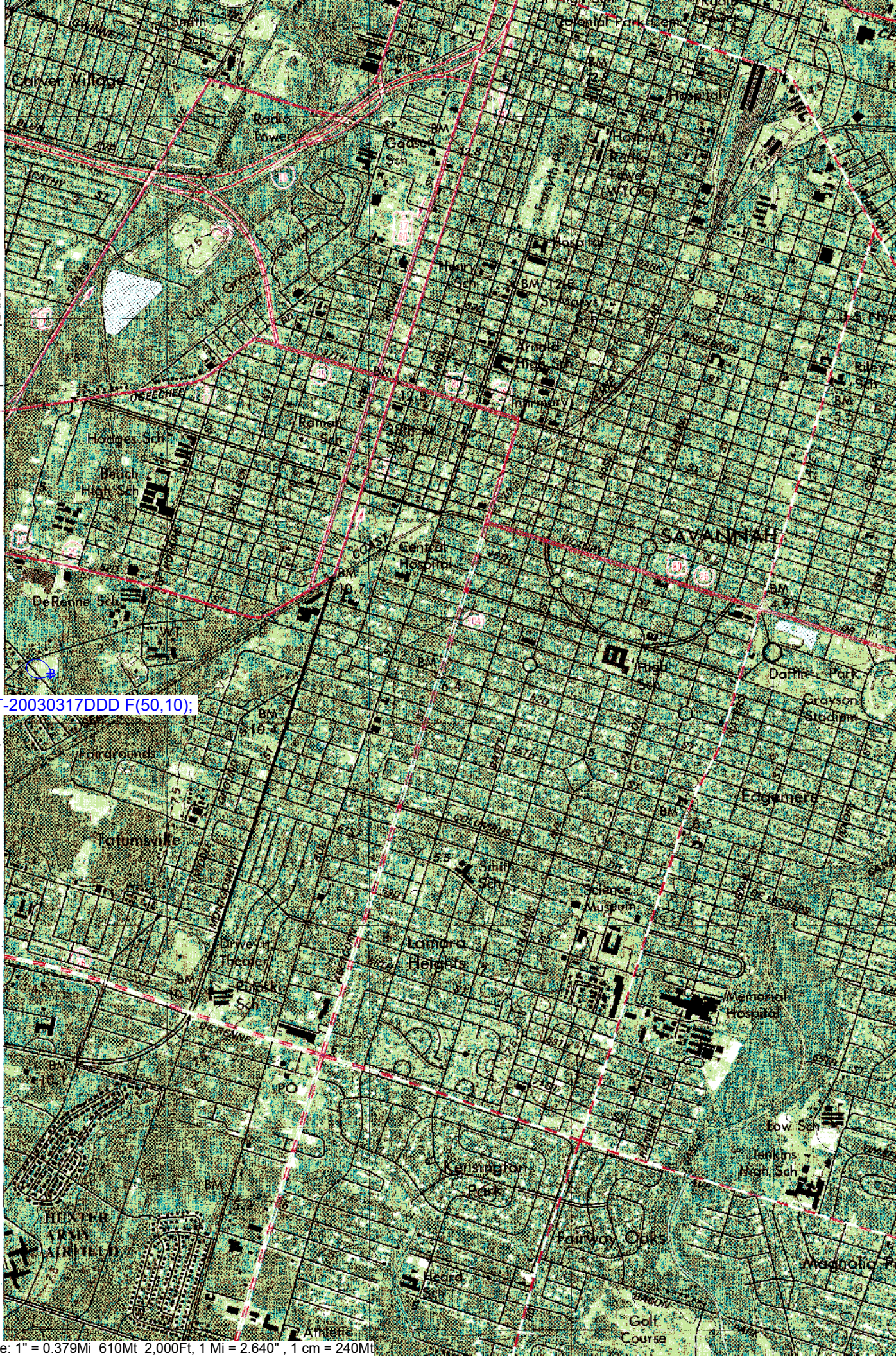
Angle	Field	Rel dB	PWR mult	dBd	Angle	Field	Rel dB	PWR mult	dBd
0	1.000	.00	3.98	6.00	-45	.423	-7.47	.71	-1.47
-1	.996	-.03	3.95	5.97	-46	.405	-7.86	.65	-1.86
-2	.993	-.06	3.93	5.94	-47	.386	-8.27	.59	-2.27
-3	.989	-.09	3.90	5.91	-48	.367	-8.71	.54	-2.71
-4	.986	-.12	3.87	5.88	-49	.348	-9.17	.48	-3.17
-5	.982	-.15	3.84	5.85	-50	.329	-9.65	.43	-3.65
-6	.976	-.21	3.79	5.79	-51	.313	-10.09	.39	-4.09
-7	.970	-.26	3.75	5.74	-52	.296	-10.57	.35	-4.57
-8	.964	-.32	3.70	5.68	-53	.280	-11.07	.31	-5.07
-9	.958	-.37	3.66	5.63	-54	.263	-11.59	.28	-5.59
-10	.952	-.42	3.61	5.58	-55	.247	-12.16	.24	-6.16
-11	.945	-.49	3.55	5.51	-56	.235	-12.57	.22	-6.57
-12	.937	-.56	3.50	5.44	-57	.224	-13.00	.20	-7.00
-13	.930	-.63	3.44	5.37	-58	.213	-13.45	.18	-7.45
-14	.922	-.70	3.39	5.30	-59	.201	-13.92	.16	-7.92
-15	.915	-.77	3.33	5.23	-60	.190	-14.42	.14	-8.42
-16	.905	-.87	3.26	5.13	-61	.180	-14.88	.13	-8.88
-17	.895	-.96	3.19	5.04	-62	.171	-15.36	.12	-9.36
-18	.885	-1.06	3.12	4.94	-63	.161	-15.86	.10	-9.86
-19	.876	-1.15	3.05	4.85	-64	.151	-16.40	.09	-10.40
-20	.866	-1.25	2.99	4.75	-65	.142	-16.97	.08	-10.97
-21	.852	-1.39	2.89	4.61	-66	.140	-17.07	.08	-11.07
-22	.838	-1.54	2.80	4.46	-67	.139	-17.16	.08	-11.16
-23	.824	-1.68	2.70	4.32	-68	.137	-17.26	.07	-11.26
-24	.810	-1.83	2.61	4.17	-69	.136	-17.36	.07	-11.36
-25	.796	-1.98	2.52	4.02	-70	.134	-17.46	.07	-11.46
-26	.780	-2.15	2.42	3.85	-71	.134	-17.44	.07	-11.44
-27	.765	-2.33	2.33	3.67	-72	.134	-17.43	.07	-11.43
-28	.749	-2.51	2.24	3.49	-73	.135	-17.42	.07	-11.42
-29	.734	-2.69	2.14	3.31	-74	.135	-17.41	.07	-11.41
-30	.718	-2.87	2.05	3.13	-75	.135	-17.39	.07	-11.39
-31	.700	-3.09	1.95	2.91	-76	.136	-17.31	.07	-11.31
-32	.682	-3.32	1.85	2.68	-77	.138	-17.22	.08	-11.22
-33	.664	-3.55	1.76	2.45	-78	.139	-17.14	.08	-11.14
-34	.646	-3.79	1.66	2.21	-79	.140	-17.06	.08	-11.06
-35	.628	-4.04	1.57	1.96	-80	.142	-16.97	.08	-10.97
-36	.608	-4.32	1.47	1.68	-81	.143	-16.87	.08	-10.87
-37	.588	-4.61	1.38	1.39	-82	.145	-16.77	.08	-10.77
-38	.568	-4.91	1.29	1.09	-83	.147	-16.67	.09	-10.67
-39	.548	-5.22	1.20	.78	-84	.148	-16.58	.09	-10.58
-40	.528	-5.54	1.11	.46	-85	.150	-16.48	.09	-10.48
-41	.507	-5.89	1.02	.11	-86	.151	-16.39	.09	-10.39
-42	.486	-6.26	.94	-.26	-87	.153	-16.31	.09	-10.31
-43	.465	-6.64	.86	-.64	-88	.154	-16.23	.09	-10.23
-44	.444	-7.05	.79	-1.05	-89	.156	-16.14	.10	-10.14

# Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Cir	Facility_id
WSIS	GA	TYBEE ISLAND	280	50000	CUMULUS LICENSING CORP.	BPH20030925AQU	C2	CP	10.2	-27.50 dB	14069
WSIS	GA	SPRINGFIELD	280	14000	CUMULUS LICENSING CORP.	BLH19991015ACI	C3	LIC	26.92	-5.24 dB	14069
NEW	GA	SAVANNAH	229	10	RADIO ASSIST MINISTRY INC.	BNPFT20030317DNS	D	APP	0	0	145130
NEW	GA	SAVANNAH	282	100	SAVANNAH COLLEGE OF ART AND DESIGN	BNPL20000602AGN	LP100	APP	14.37	1.10 dB	124472
WWVV	SC	RIDGELAND	285	16000	MONTEREY LICENSES, LLC	BLH19940705KC	C3	LIC	47.26	4.15 dB	40705
NEW	SC	HILTON HEAD ISL	282	38	EDGEWATER BROADCASTING INC.	BNPFT20030317FQZ	D	APP	35.45	5.48 dB	153405
NEW	SC	HILTON HEAD ISL	282	13	EDGEWATER BROADCASTING INC.	BNPFT20030828ACG	D	APP	35.45	10.14 dB	153405
NEW	GA	PEMBROKE	282	55	RADIO TRAINING NETWORK, INC.	BNPFT20030317BDF	D	APP	51.76	10.21 dB	153539
WSGA	GA	HINESVILLE	284	12000	BULLIE BROADCASTING CORPORATION	BLH19931210KC	C3	LIC	62.17	10.76 dB	7816
NEW	GA	PEMBROKE	282	55	RADIO TRAINING NETWORK, INC.	BNPFT20030822AHW	D	APP	51.76	10.21 dB	153539
	GA	TYBEE ISLAND	280	0		RM10694	C2	RSV	26.41	26.61 dB	0
WRFQ	SC	MOUNT PLEASAN	283	100000	CITICASTERS LICENSES, L.P.	BPH20030210AAE	C1	CP	148.28	27.66 dB	38901



4748 ft. SW  
(GARDEN CITY)  
11 KM. TO INTERSTA  
HIGHWAY 45 KM.  
SILK HOPE 6.9 KM.



ARN: BNPFT-20030317DDD F(50,10);

3545

2'30"

3544

3543

3542





-81.1224



-81.1224

