

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317HFC

Channel: 252

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 92 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 0.092kW at 121 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 117.3dBu 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 91.8 meters from the transmit antenna. Since the translator's center of radiation is 121 meters above ground level, the area of interference will be at least 29.2 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: 121m

Maximum ERP: 0.092kW

F(50,10) Interfering Contour: 117.3dBu

F(50,10) Max Distance: 91.8m

Antenna Manufacturer: SWR

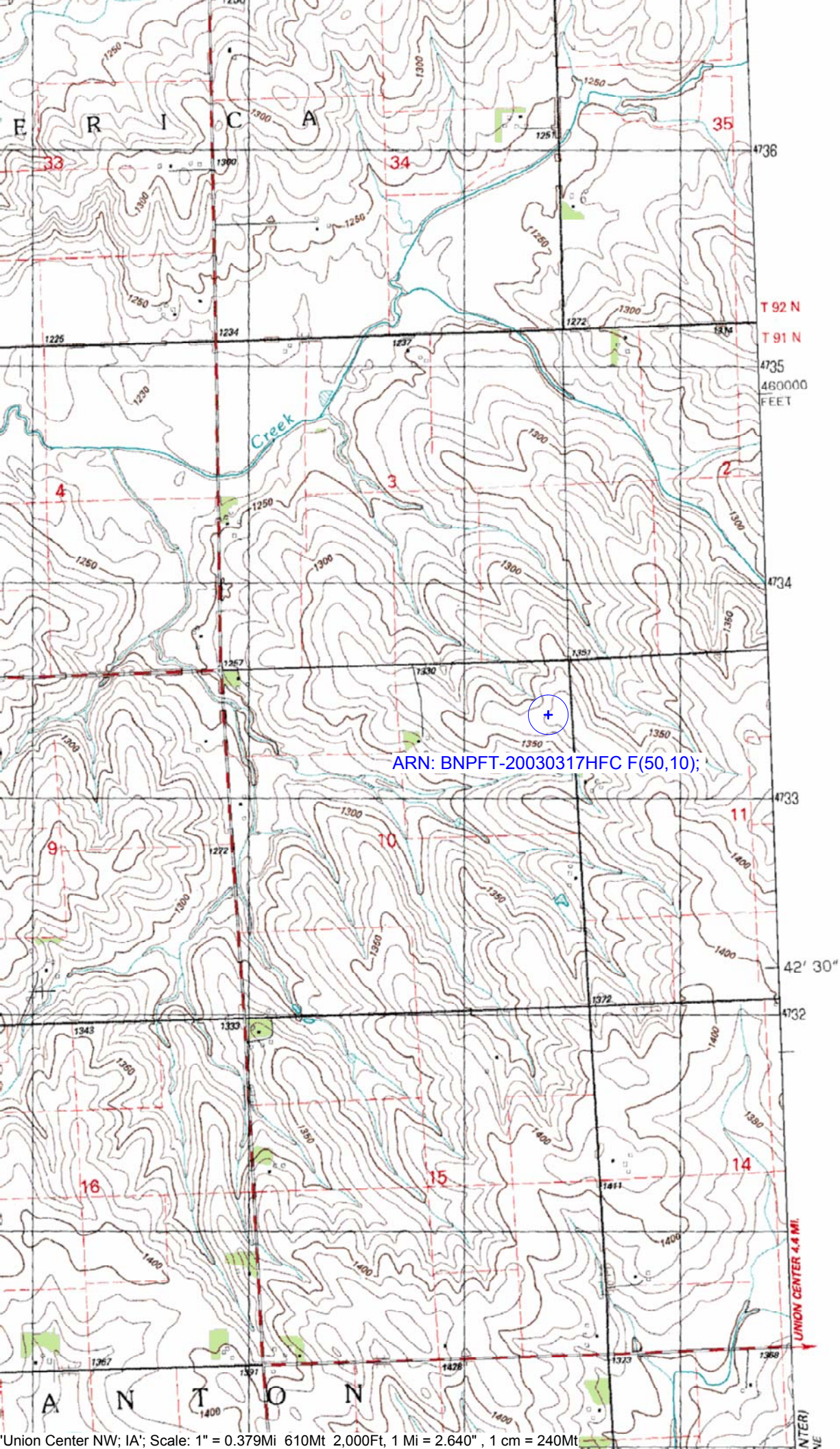
Antenna Model: FM1

F(50,10) Clearance above TGL: 29.2m

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
BLH19890313KB	KSEZ	77.8dBu	77.3dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			77.3dBu

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Facility_id	Class	Status	Distance_km	Clr
KSEZ	IA	SIOUX CITY	250	100000	CLEVELAND RADIO LICENSES, LLC	BLH19890313KB	10777	C1	LIC	28.13	-18.47 dB
NEW	IA	SIOUX CITY	255	19	EDGEWATER BROADCASTING INC.	BNPFT20030317EPD	152510	D	APP	26.51	13.40 dB
NEW	IA	STORM LAKE	252	100	ST. GABRIEL'S EDUCATIONAL RADIO ASSOCIATION	BNPL20010615ACE	133283	LP100	APP	79.88	14.09 dB
NEW	IA	SPENCER	252	170	RADIO ASSIST MINISTRY, INC.	BNPFT20030317HFU	152235	D	APP	94.3	14.36 dB
NEW	IA	DAKOTA CITY	255	140	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030313BDS	144966	D	APP	28.91	15.37 dB
K252DG	SD	SIOUX FALLS	252	250	CHRISTIAN HERITAGE BROADCASTING, INC.	BLFT19970421TD	77798	D	LIC	109.2	18.62 dB
K249DL	IA	SPIRIT LAKE	252	185	LAKES AREA CHRISTIAN RADIO	BLFT19970731TG	83434	D	LIC	109.77	20.34 dB
NEW	NE	NORFOLK	252	250	VSS CATHOLIC COMMUNICATIONS, INC.	BNPFT20030317GQG	153332	D	APP	121.18	20.05 dB
KISD	MN	PIPESTONE	254	100000	WALLACE CHRISTENSEN	BLH19970506KE	70738	C	LIC	131.85	21.64 dB
KQKQ-FM	IA	COUNCIL BLUFFS	253	100000	WAITT RADIO, INC.	BLH20021211AAA	43238	C	LIC	157.13	24.13 dB
KSEZ	IA	SIOUX CITY	250	0	CLEVELAND RADIO LICENSES, LLC		10777	C1	USE	28.13	27.35 dB
KUQL	SD	WESSINGTON SPRINGS	252	100000	SAGA COMMUNICATIONS OF SOUTH DAKOTA, LLC	BLH19981127KB	42113	C1	LIC	217.74	28.61 dB
KQKQ-FM	IA	COUNCIL BLUFFS	253	44000	WAITT RADIO, INC.	BXLH19880930KA	43238	C	LIC	162.88	32.43 dB
KRKQ	IA	BOONE	252	41000	WILKS LICENSE CO., LLC	BLH19990831AAD	30116	C2	LIC	221.66	33.66 dB
KBBX-FM	NE	NEBRASKA CITY	249	99000	JOURNAL BROADCAST CORPORATION	BMLH19970604KA	47957	C1	LIC	202.95	35.78 dB
KFGE	NE	MILFORD	251	100000	MONTEREY LICENSES, LLC	BLH19960722KE	6490	C1	LIC	226.51	37.06 dB
NEW	IA	ONAWA	255	170	EDGEWATER BROADCASTING INC.	BNPFT20030317EOE	152482	D	APP	77	37.78 dB
NEW	MN	NEW ULM	252	250	NORTHWESTERN COLLEGE	BNPFT20030314CHF	139125	D	APP	226.43	38.35 dB



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