

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317FNM

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 3 of this exhibit.

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

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.

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:

- 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 "LPMF 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.

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Facility_id	Class	Status	Distance_km	Clr
	CO	PALISADE	253	0			106509	C3	APP	15.67	-56.92 dB
NEW	CO	CEDAREGE	254	250	PROFESSIONAL ANTENNA, TOWER AND TRANSLATOR SERVICE (PATTS)	BNPFT20030314BOW	147382	D	APP	48.4	1.68 dB
K256AD	CO	PALISADE	256	10	NORTH FORK VALLEY PUBLIC RADIO, INC.	BLFT19960430TC	49229	D	LIC	24.4	3.97 dB
NEW	CO	MONTROSE	254	170	RADIO ASSIST MINISTRY, INC.	BNPFT20030317FRJ	151567	D	APP	65.01	4.89 dB
K252BP	CO	MESA	252	10	MESA BROADCASTING CO	BPFT19831006QB	41272	D	CP	25.46	4.00 dB
	CO	FRUITA	255	0		RMbg-57	0	C3	APP	34.4	11.47 dB
KAFM	CO	GRAND JUNCTIO	201	350	GRAND VALLEY PUBLIC RADIO CO, INC	BPED20030226AAA	24780	A	APP	22.86	12.9
KAFM	CO	GRAND JUNCTIO	201	16	GRAND VALLEY PUBLIC RADIO CO, INC	BLED19990304KC	24780	A	LIC	22.86	12.9
NEW	CO	RIFLE	254	75	RADIO ASSIST MINISTRY, INC.	BNPFT20030317FRW	151574	D	APP	82.5	12.18 dB
DK244DB	CO	NEW CASTLE	254	10	COLORADO WEST BROADCASTING INC.	BMJPFT20030310AYL	12307	D	APP	102.54	18.80 dB
KAYW	CO	MEEKER	251	100000	WESTERN SLOPE COMMUNICATIONS LLC	BLH20001219ACK	84266	C	LIC	112.9	19.11 dB
NEW	CO	MONTROSE	253	41	EDGEWATER BROADCASTING INC.	BNPFT20030317DET	148151	D	APP	78.22	23.65 dB
NEW	CO	MONTROSE	253	41	RADIO ASSIST MINISTRY, INC.	BNPFT20030317FRE	151562	D	APP	78.22	23.65 dB
KRTZ	CO	CORTEZ	254	27000	WINTON ROAD BROADCASTING CO., LLC	BLH19831129AA	16435	C	LIC	201.38	27.35 dB
NEW	CO	SNOWMASS	254	5	PITKIN COUNTY TRANSLATOR DEPARTMENT	BNPFT20030312ART	138104	D	APP	137.11	27.35 dB
NEW	CO	LAKE CITY	254	10	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	BNPFT20030317BRU	154499	D	APP	152.43	28.98 dB
NEW	CO	AVON	254	23	PROFESSIONAL ANTENNA, TOWER AND TRANSLATOR SERVICE (PATTS)	BNPFT20030314BPE	147757	D	APP	171.58	29.10 dB
NEW	CO	ASPEN	254	250	CIMARRON COMMUNICATIONS CO, LLC	BNPFT20030314CKZ	148669	D	APP	136.33	29.26 dB
NEW	CO	GUNNISON	254	50	RADIO ASSIST MINISTRY, INC.	BNPFT20030317FOO	151542	D	APP	148.01	29.26 dB
NEW	CO	ASPEN	254	11	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	BNPFT20030317BQJ	154235	D	APP	145.04	31.13 dB
NEW	UT	MOAB	255	250	DAVID B. SMITH	BNPFT20030317LVE	156788	D	APP	104.19	33.03 dB
NEW	CO	CRAIG	255	19	PROFESSIONAL ANTENNA, TOWER AND TRANSLATOR SERVICE (PATTS)	BNPFT20030314BGE	139406	D	APP	139.39	35.32 dB
KMTS	CO	ENWOOD SPRIN	256	10000	COLORADO WEST BROADCASTING, INC.	BLH19960426KC	12378	C3	LIC	114.4	36.72 dB
KDEA-LP	CO	DELTA	256	100	COLORADO, STATE OF, TELECOM SERVS	BLL20030123ABB	131687	LP100	LIC	47.45	37.74 dB
K251AF	CO	MONTROSE	251	232	PROFESSIONAL ANTENNA, TOWER & TRANS	BLFT19960604TB	76228	D	LIC	76.93	38.63 dB
KURA-LP	CO	OURAY	255	100	OURAY SCHOOL DISTRICT R1	BLL20020812ABP	131909	LP100	LIC	131.28	38.17 dB
NEW	CO	MEEKER	253	19	RADIO ASSIST MINISTRY, INC.	BNPFT20030317FQH	151552	D	APP	123.55	39.75 dB
K255AF	CO	CRESTED BUTTE	255	780	JAY J. O'NEAL	BLFT19940718TB	30588	D	LIC	133.26	39.72 dB
NEW	CO	REDDALE	252	10	PROFESSIONAL ANTENNA, TOWER AND TRANSLATOR SERVICE (PATTS)	BNPFT20030317KHR	157077	D	APP	81.83	39.20 dB