

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 150219

Channel 288

### **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 $\mu$  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.

**Note: The quadrangle indicates the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision and therefore "lack of population" is demonstrated.**

## 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1062789	BPH20040719AAA	KLAZ	91.9	91
130192	BLH19890619KC	KLAZ	70	69.6
666376	BMLH20030612ADV	KMJX	66.3	65.6
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>65.6</b>

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 **65.6 dBμ**, this makes the proposed translator's worst-case interfering contour **105.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **480 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population"). 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.

**Note: The quadrangle indicates the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision and therefore "lack of population" is demonstrated.**

**Antenna Manufacturer:** ERI  
**Antenna Model:** 100-1  
**CORAGL:** 89 m  
**Maximum ERP:** 0.17 kW  
**Interfering Contour:** 105.6 dBμ  
**Max Int. Contour Distance:** 480 m

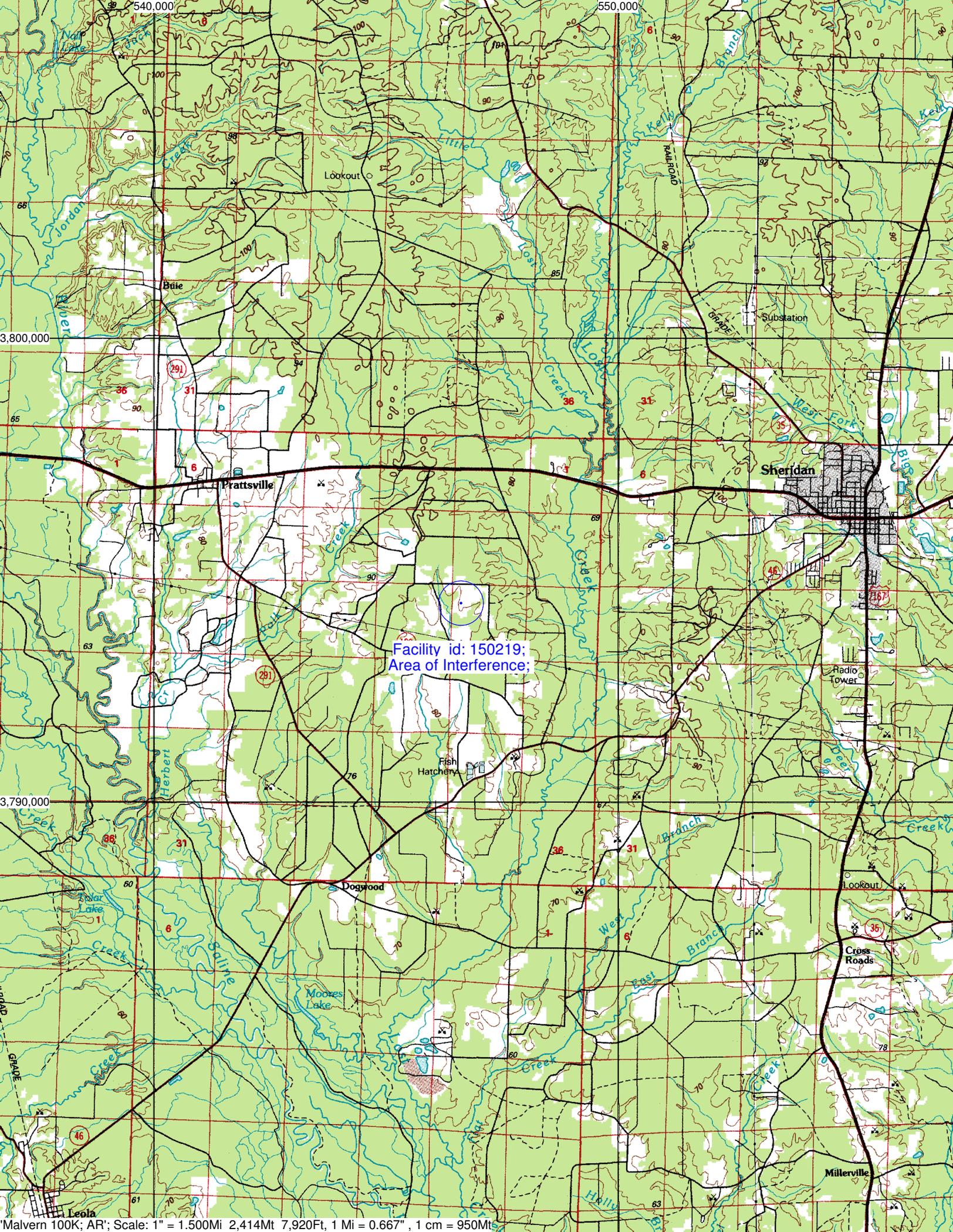
## Adjacent Channel Study For Station K288FP, Facility\_id: 150219

### Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1062789	48947	BPH	20040719AAA	KLAZ	NOALMARK BROADCASTING CORPORATION	C1	HOT SPRINGS	AR	CP	100	385	290	2	16.4	1.0144
130192	48947	BLH	19890619KC	KLAZ	NOALMARK BROADCASTING CORPORATION	C1	HOT SPRINGS	AR	LIC	95	465	290	2	51.7	1.0144
666376	39689	BMLH	20030612ADV	KMJX	CLEAR CHANNEL BROADCASTING LICENSES, INC	C1	CONWAY	AR	LIC	79	448	286	2	56.4	1.0144
681897	150214	BNPFT	20030826AEK	K288EZ	RADIO ASSIST MINISTRY, INC.	D	LITTLE ROCK	AR	CP	0.25	167	288	0	53.3	0
1081465	39689	BXLH	20050927ALE	KMJX	CLEAR CHANNEL BROADCASTING LICENSES, INC	C1	CONWAY	AR	LIC	16.5	425	286	2	56.4	0
1134392	150197	BMPFT	20060616ACA	K288FD	RADIO ASSIST MINISTRY INC.	D	ARKADELPHIA	AR	CP MOD	0.115	204	288	0	61	0
300768	52651	BLH	7115	KWRF-FM		A	WARREN	AR	LIC	3	135	288	0	83.1	0
1081162	150203	BMPFT	20050824AAG	K288FC	RADIO ASSIST MINISTRY INC.	D	CAMDEN	AR	CP MOD	0.25	125	288	0	85.2	0
107871	2775	BLH	19871221KE	KWAK-FM	ARKANSAS COUNTY BROADCASTERS, INC.	A	STUTT GART	AR	LIC	2.7	162	288	0	98.3	0
644708	151624	BNPFT	20030317ANE	NEW	SISTER GRACE, INC.	D	DUMAS	AR	APP	0.25	74	287	1	104.4	0
259422	48740	BLH	19971217KE	KHPA	NEWPORT BROADCASTING COMPANY	A	HOPE	AR	LIC	6	195	285	3	111.3	0
618345	76511	BLH	20021114ABC	KYEL	DANVILLE FM, INC.	A	DANVILLE	AR	LIC	4.4	247	288	0	112.8	0
1115440	164210	BMPH	20060221ADI	KKSJ	MALVERN ENTERTAINMENT CORPORATION	C3	KENSETT	AR	CP MOD	15	229.2	289	1	129.1	0
1097386	54822	BPH	20051027ACK	KNAS	ARKLATEX RADIO, INC.	A	NASHVILLE	AR	CP	6	209	288	0	130.2	0
62623	22426	BLFT	19831031NO	K288CH	FRED H. BAKER, JR.	D	BOONEVILLE, ETC.	AR	LIC	0.218	1369	288	0	145.6	0
1104195	50405	BPH	20051221ALW	KXRR	OPUS BROADCASTING MONROE LLC	C	MONROE	LA	APP	100	476	291	3	185.2	0

### Intermediate Frequencies (53 and 54 channels difference):

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
171953	61366	BLH	19920326KC	KHLR	CLEAR CHANNEL RADIO LICENSES, INC.	C	MAUMELLE	AR	LIC	96	646	235	53	30.5	1.5



Facility id: 150219;  
Area of Interference;