

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 147568

Channel 236

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.

Note: The quadrangle and aerial photo indicate the presence of a county road in the area of interference. It is apparent that this is not a major road, e.g. interstate highway, as described in the Living Way decision and therefore "lack of population" is demonstrated.

Since the proposed translator is within 320 km of the Canadian border, 47 C.F.R. § 74.1235(d) has been taken into account and this applicant certifies that in no direction does the 34 dB μ F(50,10) extend beyond 60 km, and this application is therefore in full compliance with 47 C.F.R. § 74.1235(d)(3), which states that "the distance to the 34 dB μ interfering contour may not exceed 60 km in any direction," and hence complies with 47 C.F.R. § 74.1204(h).

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 dB μ 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 |
|---|--------------------|-----------------|-------------------------|---------------------|
| 65524 | BLH19840120AE | WLHT-FM | 80.2 | 80 |
| 67517 | BLH19840309AR | WTNR | 64.3 | 64.3 |
| Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour | | | | 64.3 |

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 **64.3 dB μ** , this makes the proposed translator's worst-case interfering contour **104.3 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **154.2 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.

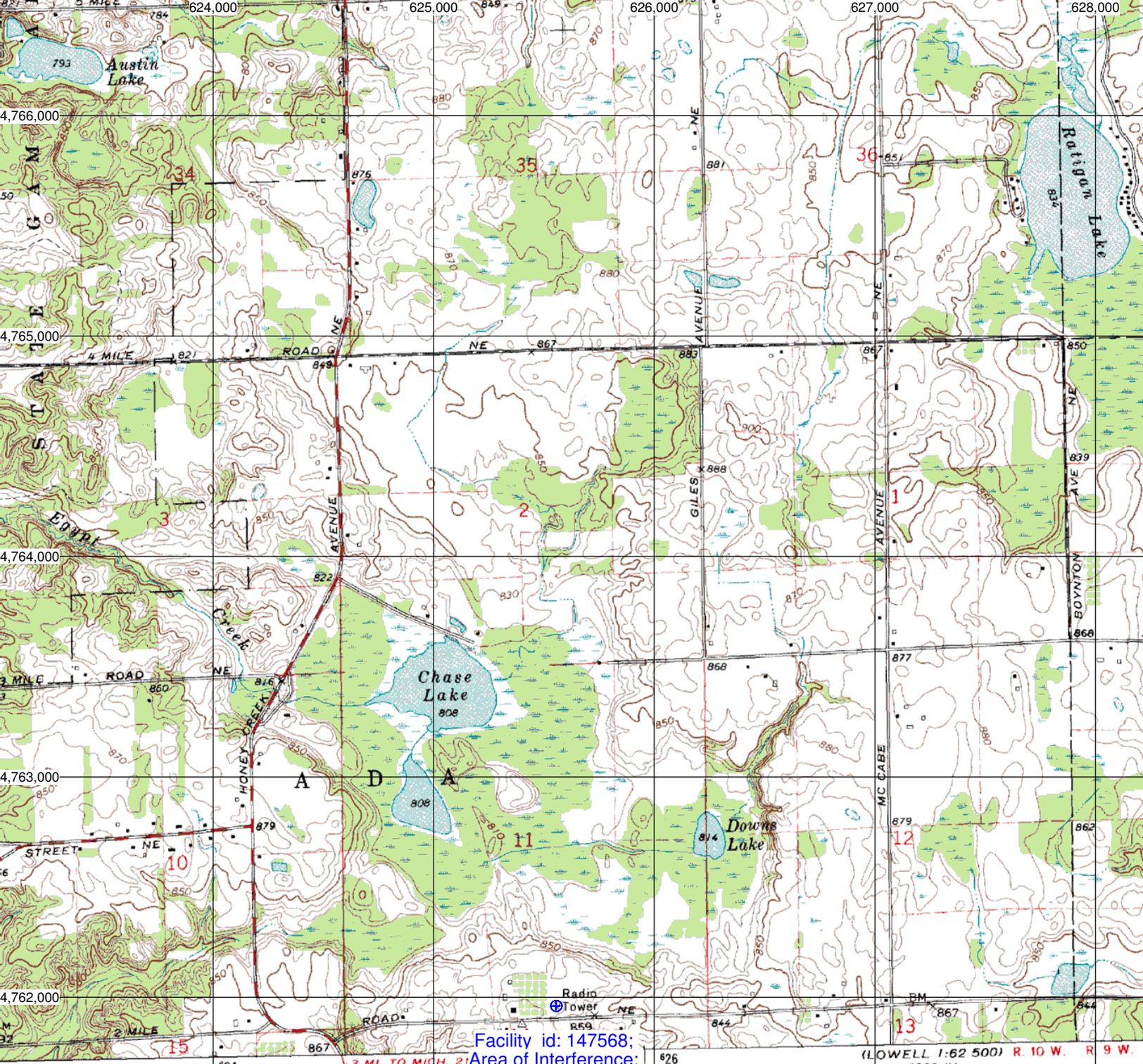
Note: The quadrangle and aerial photo indicate the presence of a county road in the area of interference. It is apparent that this is not a major road, e.g. interstate highway, as described in the Living Way decision and therefore "lack of population" is demonstrated.

Antenna Manufacturer: ERI
Antenna Model: 100-1
CORAGL: 63 m
Maximum ERP: 0.013 kW
Interfering Contour: 104.3 dB μ
Max Int. Contour Distance: 154.2 m

**Adjacent Channel Study
For Station W237BW, Facility_id: 147568**

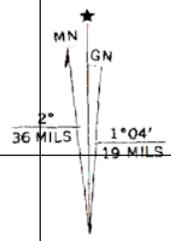
Co-channel through third adjacent:

| Application_id | Facility_id | Prefix | ARN | Call | Licensee | Class | City | State | Status | ERP | RCAMSL | Channel | Adj | Dist | Overlap |
|----------------|-------------|--------|-------------|---------|------------------------------------|-------|--------------|-------|--------|-------|--------|---------|-----|-------|---------|
| 65524 | 37457 | BLH | 19840120AE | WLHT-FM | CAPSTAR TX LIMITED PARTNERSHIP | B | GRAND RAPIDS | MI | LIC | 40 | 397 | 239 | 3 | 19.5 | 0.3088 |
| 67517 | 41678 | BLH | 19840309AR | WTNR | MICHIGAN MEDIA, INC. | B | HOLLAND | MI | LIC | 50 | 353 | 233 | 3 | 44 | 0.3088 |
| 681186 | 147577 | BNPFT | 20030825AEG | K237DB | EDGEWATER BROADCASTING, INC. | D | HUDSONVILLE | MI | CP | 0.055 | 259 | 237 | 1 | 34.5 | 0 |
| 629243 | 138661 | BNPFT | 20030310BBP | NEW | CALVARY CHAPEL OF TWIN FALLS, INC. | D | SPRING LAKE | MI | APP | 0.019 | 280 | 235 | 1 | 56 | 0 |
| 643238 | 150284 | BNPFT | 20030317JEZ | NEW | RADIO ASSIST MINISTRY, INC. | D | GRAND HAVEN | MI | APP | 0.08 | 234.3 | 235 | 1 | 61.6 | 0 |
| 48801 | 33696 | BLH | 19821105AF | WGVS-FM | GRAND VALLEY STATE UNIVERSITY | A | WHITEHALL | MI | LIC | 2 | 304 | 237 | 1 | 80.5 | 0 |
| 1036817 | 142077 | BLFT | 20041228AAQ | W236AV | FAMILY LIFE BROADCASTING SYSTEM | D | KALAMAZOO | MI | LIC | 0.036 | 324 | 236 | 0 | 82.4 | 0 |
| 294551 | 37461 | BLH | 6625 | WBXX | | A | BATTLE CREEK | MI | LIC | 3 | 362 | 237 | 1 | 83 | 0 |
| 166428 | 24641 | BLH | 19911106KF | WMMQ | LIGGETT BROADCAST, INC. | B | EAST LANSING | MI | LIC | 50 | 421 | 235 | 1 | 83.3 | 0 |
| 1146666 | 145136 | BLFT | 20060830AAF | W238AL | MIDWEST COMMUNICATIONS, INC. | D | PORTAGE | MI | LIC | 0.13 | 308 | 238 | 2 | 85.6 | 0 |
| 1026762 | 39546 | BPH | 20031103ACY | WCFX | GRENAX BROADCASTING, LLC | A | CLARE | MI | CP | 6 | 358 | 237 | 1 | 97.9 | 0 |
| 155827 | 39546 | BMLH | 19901227KB | WCFX | MACKIN-HULTS BROADCASTING, INC. | A | CLARE | MI | LIC | 6 | 355 | 237 | 1 | 98.2 | 0 |
| 1051916 | 60787 | BMLH | 20041124AGB | WCEN-FM | NM LICENSING LLC | C1 | HEMLOCK | MI | LIC | 100 | 519 | 233 | 3 | 106.2 | 0 |

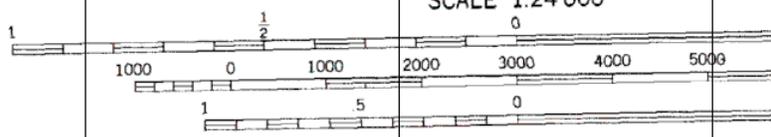


Facility id: 147568;
Area of Interference;

published by the Geological Survey
of the State of Michigan agencies
GC&GS
Symmetric methods from aerial
photographs. Field checked 1972
North American datum
on Michigan coordinate system, south zone
transverse Mercator grid ticks,



UTM GRID AND 1972 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET



SCALE 1:24 000

CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON, D. C.
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE

85.4596

43.0019

43.0019

