

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 150669

Channel 209

### **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.

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 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. The zone of predicted interference extends 150.7m from the proposed transmit site on Shelton Auto salvage yard. The nearest buildings are 194m away to the east, so 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.**

## 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>
1017980	BLED20040927ALP	WABE	64.5	64.5
1198644	BPED20070820ABQ	WABE	67.3	67.2

Minimum F(50,50) Contour of Adjacent Station within  
Proposed Translator's Standard Interfering Contour **64.5**

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 **64.5 dBμ**, this makes the proposed translator's worst-case interfering contour **104.5 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **150.7 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").

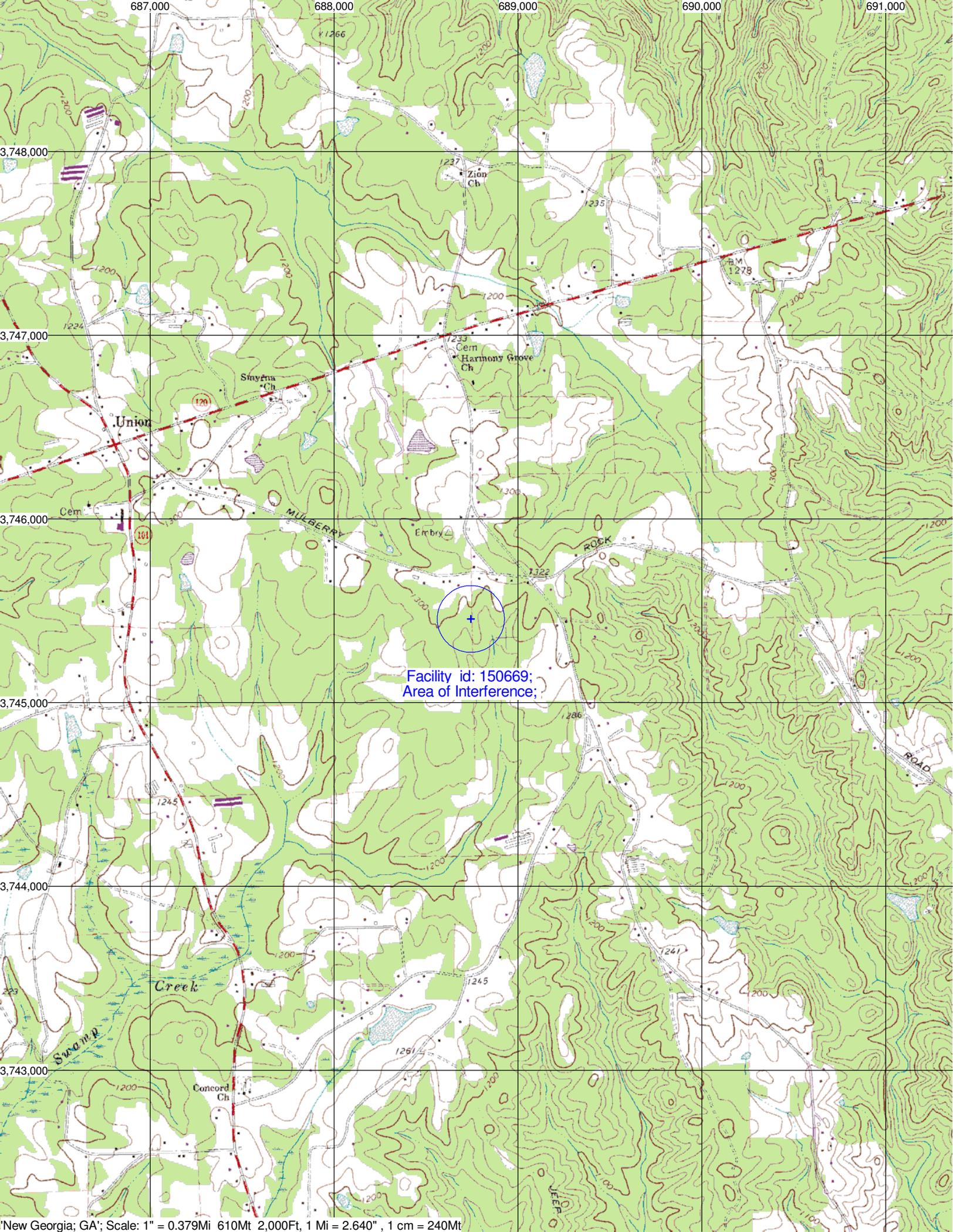
**Note: The quadrangle and aerial photo indicate the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision. The zone of predicted interference extends 150.7m from the proposed transmit site on Shelton Auto salvage yard. The nearest buildings are 194m away to the east, so 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.**

**Antenna Manufacturer: NIC**  
**Antenna Model: BLD1/P**  
**CORAGL: 23 m**  
**Maximum ERP: 0.013 kW**  
**Interfering Contour: 104.5 dBμ**  
**Max Int. Contour Distance: 150.7 m**

**Adjacent Channel Study  
For Station W209CG, Facility\_id: 150669**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1017980	3538	BLED	20040927ALP	WABE	BOARD OF EDUCATION OF THE CITY OF ATLANTA	C1	ATLANTA	GA	LIC	96	531.2	211	2	59	0.0895
1198644	3538	BPED	20070820ABQ	WABE	BOARD OF EDUCATION OF THE CITY OF ATLANTA	C0	ATLANTA	GA	CP	100	615	211	2	59.1	0.0895
1314989	148550	BLFT	20090528AKZ	W207CA	EDGEWATER BROADCASTING, INC.	D	TALLAPOOSA	GA	LIC	0.022	394	207	2	8.7	0
606608	123241	BNPFT	20000417AAK	NEW	FAITH PLEASES GOD CHURCH CORP.	D	CARROLLTON	GA	APP	0.027	394	210	1	26.3	0
1208875	173263	BNPED	20071012AFG	NEW	SOUTHWEST RADIO CHURCH OF THE AIR, INC	A	CEDARTOWN	GA	APP	1	347	208	1	36.7	0
701533	93444	BLED	20040217ABU	WWBM	BEST MEDIA, INC.	A	YATES	GA	LIC	1	351	209	0	41.8	0
1271242	177189	BNPED	20071022BHR	NEW	HARVEST CHRISTIAN FELLOWSHIP, INC.	C3	PIEDMONT	AL	APP	7.1	379	208	1	46.5	0
220459	64263	BLFT	19960213TD	W212AR	WAY-FM MEDIA GROUP, INC.	D	LINDALE	GA	LIC	0.01	434	212	3	50.7	0
1061697	92876	BLED	20050512ADF	WKNG-FM	COVENANT COMMUNICATIONS INC.	A	HEFLIN	AL	LIC	0.25	533	206	3	54.9	0
1198365	171676	BNPED	20071015ABB	NEW	ALABAMA CHRISTIAN RADIO INC	A	PIEDMONT	AL	APP	0.3	278	208	1	57.6	0
493583	122883	BNPFT	20000301ABT	NEW	WAY- FM MEDIA GROUP, INC.	D	BUCKHEAD	GA	APP	0.01	494	209	0	58	0
493593	122887	BNPFT	20000301ABU	NEW	WAY-FM MEDIA GROUP, INC.	D	LA VISTA	GA	APP	0.01	494	209	0	58	0
1208736	54585	BLED	20071001DQH	WRFG	RADIO FREE GEORGIA BROADCASTING FOUNDATION	C1	ATLANTA	GA	LIC	65	432	207	2	58.1	0
1213398	175734	BNPED	20071017ABV	NEW	JOY CHRISTIAN COMMUNICATIONS, INC	A	PIEDMONT	AL	APP	0.5	256	208	1	58.9	0
432237	82705	BLED	20000203AAC	WTBB	TRINITY CHRISTIAN ACADEMY	C3	GADSDEN	AL	LIC	4.8	390	210	1	99.2	0
1262048	65216	BMLD	20080815ABL	WDYN	TENNESSEE TEMPLE UNIVERSITY	C1	CHATTANOOGA	TN	LIC	100	655	209	0	152.1	0



Facility id: 150669;  
Area of Interference;

