

## Exhibit 12

### Non-Interference Compliance

Channel: 260

Reference to: FCC File Number: BLFT-20090727AAG Licensed Translator W258BJ E. Haven, Vermont Facility id 155261) This Application proposes a site modification to Lancaster, New Hampshire, a frequency change, up two channels, and designation of a new Commercial Primary Station. (WXXS-FM)

### Description of Exhibit 12 Contents

This exhibit will show that the proposed facility complies with contour overlap interference protection provisions in 47 CFR 74.1204.

Specifically we will show compliance because the Proposed ch. 260 Translator is fully spaced with all domestic and international stations, applications, and allotments.

The applicant certifies that should any actual interference occur, operation of the translator will be suspended in accordance with 47 CFR 74.1203.

Page 3, Exhibit 12(a), displays the F(50/50) 60 dbu of the proposed channel 260 Translator overlapping the F(50/50) 60 dbu of the original W258BJ Licensed Facilities, thus compliance with CFR, 74.1233(a) (2).

Please note that the Primary Station is (WXXS-FM), Lancaster, NH. Received Direct Off Air.

Page 4, Exhibit 12(b), is a Table showing the distance to the F (50/50) 60 dbu contour of the Proposed 99.9 Translator, prepared using ComStudy 2.2. \*(Also note the HAAT Column of this Exhibit for Reference)

Page 5, Exhibit 12(c), is a Table showing the distance to the Proposed ch. 260 Translator's F(50,10) 34 dBu Interfering Contour.

Page 6, Exhibit 12(d), is a Topographical map of the area around the proposed channel 260 translator site.

Since the proposed channel 260 translator is about 52 kilometers from the Canadian Border, the applicant certifies that the 50/10, 34 dbu contour does not extend beyond the U.S. Border, or exceed 60 kilometers in any direction, in compliance with CFR 47, Sec. 74.1235 (d)3, which states that "the distance to the 34 dbu interfering contour may not exceed 60 kilometers in any direction", and hence is in compliance with 47 CFR 74.1204(h). (see page 5, Exhibit 12(c) & Page 3, Exhibit 12 (a))

Cont...

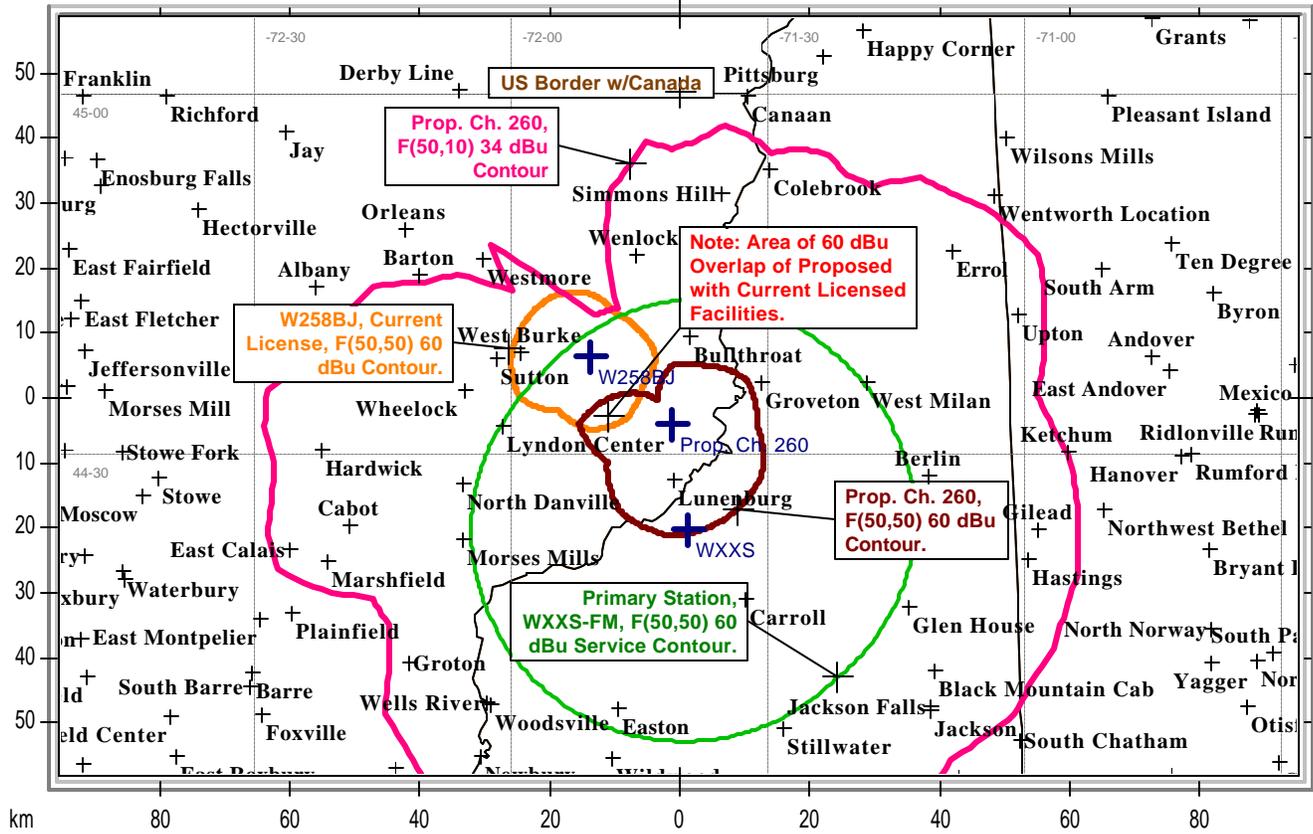
**Explanation of ComStudy Frequency Finder Results:**

The Interference analysis for the instant application was performed using data taken directly from the FCC's FM database, which looks for prohibited overlap with contours of adjacent stations, and prohibited proximity to stations 53 or 54 channels from the proposed translator station (IF) using 3 arc second terrain data and the FCC's contour algorithms. See results of analysis in Table on Page 7, Exhibit 12(e). (ComStudy uses the FCC's FM Database, thus the results included the proposed translator's currently licensed or applied for facilities. This line was deleted from the Table to save confusion) The results show the proposal is fully spaced to all domestic, and international stations, applications, and allotments.

The proposed channel 260 Translator can operate with an effective radiated power of 90-watts at 6 meters AGL. . (see page 3, Exhibit 12(a) Contour Study) (For reference HAAT on the 12 required radials, see page 3, Exhibit 12 (a) and note the HAAT column)

THE PROPOSED OPERATION OF CH. 260, FM TRANSLATOR IS EXEMPT FROM ROUTINE EVALUATION WITH RESPECT TO RADIOFREQUENCY RADIATION UNDER SECTION 1.1307(B) OF THE COMMISSION'S RULES, BECAUSE THE EFFECTIVE RADIATED POWER DOES NOT EXCEED 100 WATTS. THE APPLICANT WILL OPERATE THE PROPOSED FM TRANSLATOR AT REDUCED POWER, OR TEMPORARILY CEASE OPERATION, AS MAY BE REQUIRED TO PROTECT ALL WORKERS FROM EXPOSURE TO HAZARDOUS LEVELS OF RADIOFREQUENCY RADIATION.

Prop. Ch. 260 Xlator is fully spaced w/ Domestic & Intl. Stns. Applications & Allotments



60 dBu Contour of Prop. Xlator is within 60 dBu Contour of Primary Stn.

— National Borders    — State Borders    — Lat/Lon Grid

**Ch. 260 Lancaster, NH,  
Distance to 60 dBu Contour**

**Site: Prop. Ch. 260**  
**Coordinat 44-32-25.2 N, 71-41-08.2 W**  
**Freq: 99.90000 MHz**  
**ERP: 90.01 W**

<b>Bearing</b>	<b>ERP W</b>	<b>HAAT</b>	<b>DH</b>	<b>Distance</b>	<b>Lat</b>	<b>Lon</b>
0	26.74	148	210	9.05	44.62174	-71.6856
30	25.67	200	490	9.1	44.62215	-71.6836
60	27.73	324	450	9.14	44.62255	-71.6816
90	37.91	264	450	9.19	44.62292	-71.6795
120	59.64	310	750	9.24	44.62326	-71.6775
150	79.7	292	420	9.29	44.62357	-71.6754
180	88.4	292	280	9.33	44.62385	-71.6733
210	90.01	244	140	9.38	44.62412	-71.6712
240	86.98	135	310	9.43	44.62435	-71.669
270	75.36	224	360	9.48	44.62456	-71.6669
300	53.23	108	290	9.53	44.62473	-71.6647
330	33.93	-28	460	9.57	44.62488	-71.6625

**Ch. 260 Lancaster, NH,  
Distance to 34 dBu Contour**

**Site: Prop. Ch. 260**  
**Coordinates 44-32-25.2 N, 71-41-08.2 W**  
**Freq: 99.90000 MHz**  
**ERP: 90.00 W**

<b>Bearing</b>	<b>ERP W</b>	<b>HAAT</b>	<b>DH</b>	<b>Distance</b>	<b>Lat</b>	<b>Lon</b>
0	26.74	148	210	42.46	44.92225	-71.6856
30	25.67	200	490	42.64	44.92386	-71.6762
60	27.73	324	450	42.83	44.92537	-71.6666
90	37.91	264	450	43.02	44.92675	-71.657
120	59.64	310	750	43.2	44.92801	-71.6473
150	79.7	292	420	43.39	44.92915	-71.6376
180	88.4	292	280	43.58	44.93017	-71.6278
210	90.01	244	140	43.77	44.93106	-71.6179
240	86.98	135	310	43.95	44.93182	-71.6079
270	75.36	224	360	44.14	44.93245	-71.5979
300	53.23	108	290	44.33	44.93296	-71.5878
330	33.93	-28	460	44.51	44.93333	-71.5777

Proposed Channel 260 Translator, Site Topo Map

44-32-25.2 N, 71-41-08.2 W



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**Prop. Ch. 260, Lancaster, NH  
Frequency Separation Study (Table)**

**44-32-25.2 N, 71-41-08.2 W  
90 Watts ERP, @ 6 Meters AGL**

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
			100.5	261	0	B	APP	95.86	0	37.58 dB
NEW	NH	BERLIN	100.1	261	10	D	APP	40.21	0	6.77 dB
NEW	NH	BERLIN	100.3	262	10	D	APP	40.19	0	18.94 dB
NEW	NH	MANCHESTER	99.9	260	38	D	APP	178.3	0	31.02 dB
NEW	NH	NASHUA	99.9	260	10	D	APP	193.65	0	34.20 dB
NEW	VT	MONTPELIER	99.3	257	250	D	APP	77.11	0	36.67 dB
NEW	VT	ST JOHNSBURY	89.3	207	120	A	APP	16.89	10	6.9
NEW	VT	ST. JOHNSBURY	89.3	207	440	C3	APP	16.92	12	4.9
NEW	VT	WAITSFIELD	99.7	259	120	D	APP	99.59	0	29.33 dB
W257AU	VT	ST. JOHNSBURY, ETC.	99.3	257	5	D	LIC	26.85	0	14.54 dB
W258AZ	VT	NEWBURY	99.5	258	10	D	LIC	65.15	0	29.11 dB
W260AS	MA	LAWRENCE	99.9	260	10	D	LIC	201.95	0	34.37 dB
W260AS	MA	LAWRENCE	99.9	260	10	D	CP MOD	203.49	0	35.04 dB
W261CB	VT	NORWICH(WEST LEBANON	100.1	261	5	D	LIC	112.96	0	32.28 dB
W262AA	VT	MONTPELIER	100.3	262	100	D	LIC	75.28	0	34.11 dB
WBTZ	NY	PLATTSBURGH	99.9	260	0	C	USE	155.01	0	30.91 dB
WBTZ	NY	PLATTSBURGH	99.9	260	9900	C	LIC	155.01	0	17.64 dB
WBTZ	NY	PLATTSBURGH	99.9	260	9900	C	LIC	155.03	0	17.65 dB
WBTZ	NY	PLATTSBURGH	99.9	260	100000	C	LIC	155.04	0	10.99 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	212.98	0	38.79 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	212.98	0	38.79 dB
WCRB	MA	LOWELL	99.5	258	37000	B	LIC	212.98	0	37.90 dB
WEVJ	NH	JACKSON	99.5	258	4700	A	LIC	57.85	0	24.87 dB
WFRD	NH	HANOVER	99.3	257	6000	A	LIC	109.95	0	28.05 dB
WHEB	NH	PORTSMOUTH	100.3	262	50000	B	LIC	181.01	0	32.92 dB
WHEB	NH	PORTSMOUTH	100.3	262	50000	B	LIC	181.01	0	32.20 dB
WJPK	VT	BARTON	100.3	262	0	A	USE	45.3	0	35.19 dB
WJPK	VT	BARTON	100.3	262	100	A	LIC	44.73	0	36.19 dB

WNTK-FM	NH	NEW LONDON	99.7	259	0	A	USE	127.46	0	36.35 dB
WNTK-FM	NH	NEW LONDON	99.7	259	1450	A	LIC	124.58	0	29.63 dB
WNTK-FM	NH	CLAREMONT	99.7	259	55	D	LIC	139.97	0	38.24 dB
WPNH-FM	NH	PLYMOUTH	100.1	261	0	A	USE	86.6	0	25.03 dB
WPNH-FM	NH	PLYMOUTH	100.1	261	410	A	LIC	89.42	0	16.38 dB
WRAN-LP	VT	RANDOLPH	100.1	261	100	LP100	LIC	98.06	13	27.94 dB
WTHT	ME	AUBURN	99.9	260	0	B	USE	128.82	0	17.67 dB
WTHT	ME	AUBURN	99.9	260	28500	B	LIC	128.82	0	0.28 dB
WUMF-FM	ME	FARMINGTON	100.1	261	13	D	LIC	122.75	0	38.90 dB
WXRG	MA	ATHOL	99.9	260	0	A	USE	220.72	0	39.41 dB
WXRG	MA	ATHOL	99.9	260	1850	A	LIC	220.19	0	35.56 dB
WXXK	NH	LEBANON	100.5	263	22000	C3	LIC	109.81	0	24.97 dB

The Proposed channel 260 Translator is fully spaced (as indicated in the above study) to all Domestic, and International, Stations, Applications, and Allotments.