

[Exhibit 12]

## **Non-Interference Compliance**

For an Open Site

Regarding FCC File Number: BNPFT-20030317DSE

### **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.

At the end of this exhibit are plots of the protected and interference contours of the proposed translator and any other stations from which the applicant is willing to accept interference. These contours were plotted using 3 arc second terrain data for the highest degree of accuracy possible.

**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.**

Since the proposed translator is 150.3 km from the Canadian border, 47 CFR 74.1235(d) has been taken into account and this applicant certifies that in no direction does the 34 dBu F(50,10) extend beyond 60 km, and this application is therefore in full compliance with 47 CFR 74.1235(d)(3), which states that "the distance to the 34 dBu interfering contour may not exceed 60 km in any direction," and hence in compliance with 47 CFR 74.1204(h).

## **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:

- Since the proposed station's Effective Radiated Power (ERP) is 75 watts, a negative value in km (no units listed in the table) does not represent a violation of the CFR, according to 47 CFR 1204(g), which states that "FM translator stations and booster stations operating with less than 100 watts ERP will be treated as class D stations and will not be subject to intermediate frequency separation requirements."

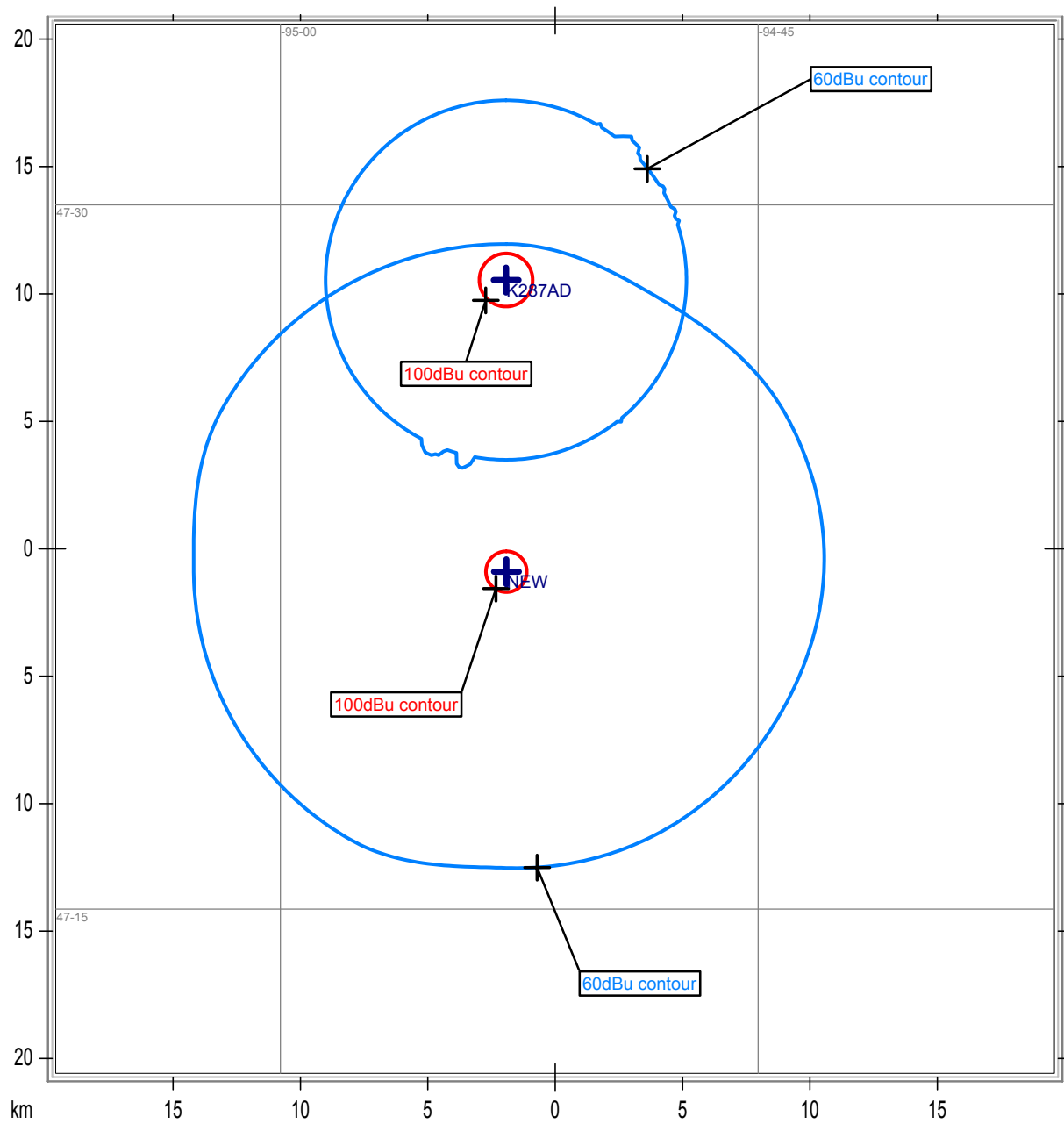
- A second or third adjacent LP100 station cannot represent a violation of the CFR, as 47 CFR 74.1204(a)(4) requires protection of only co-channel and first adjacent LP100 stations.

- 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 "LPFM 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.

- Entries highlighted in blue are those that were returned in the results because of interference caused to this proposed translator. Contours were plotted by RadioSoft's Comstudy, version 2.2, using the FCC's contour algorithms, and these are included at the end of this exhibit showing that interference is caused only to the proposed translator and not by it.

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
K287AD	MN	BEMIDJI	287	250	NORTHERN COMMUNITY RADIO, INC.	BLFT20000919AHI	D	LIC	11.51	-3.84 dB	49542
NEW	MN	WALKER	285	190	SHINE THE LIGHT, INC	BNPFT20030312ACK	D	APP	38.31	6.07 dB	138016
NEW	MN	BEMIDJI	281	250	EDGEWATER BROADCASTING INC.	BNPFT20030317DRZ	D	APP	25.43	11.10 dB	152416
	MN	BLACKDUCK	283	0		RM9487	A	APP	47.27	16.66 dB	0
NEW	MN	PARK RAPIDS	285	250	NORMIN BROADCASTING CO.	BNPFT20030313AJG	D	APP	49.97	17.86 dB	142821
NEW	MN	GRAND RAPIDS	284	140	EDGEWATER BROADCASTING INC.	BNPFT20030317DSN	D	APP	106.17	17.10 dB	152422

## World Radio Link



## Contour Analysis

State Borders      Lat/Lon Grid