

[Exhibit 12]

## **Non-Interference Compliance**

For an Open Site

Regarding FCC File Number: BNPFT-20030317CXZ

### **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.

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.

## **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:

- 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.

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Sep	Clr	Facility_id
NEW	CO	GREELEY	280	140	HORIZON CHRISTIAN FELLOWSHIP	BNPFT20030317AXA	D	APP	90.37	0	13.03 dB	141905
NEW	CO	EVANS	280	50	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	BNPFT20030312AWT	D	APP	90.11	0	15.52 dB	140284
NEW	CO	ARVADA	280	250	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030313BKO	D	APP	96.66	0	16.08 dB	140515
KRFX	CO	DENVER	278	100000	JACOR BROADCASTING OF COLORADO, INC.	BPH20030424AAO	C	APP	142.11	0	17.85 dB	29731
NEW	CO	WESTMINSTER	280	250	EDGEWATER BROADCASTING INC.	BNPFT20030317CYX	D	APP	113.46	0	18.98 dB	151281
NEW	CO	MEAD	280	80	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	BNPFT20030312ADA	D	APP	115.8	0	20.73 dB	140248
NEW	CO	STERLING	279	250	HORIZON CHRISTIAN FELLOWSHIP	BNPFT20030317AWX	D	APP	69.06	0	20.19 dB	141906
KJCD	CO	LONGMONT	282	91000	JEFFERSON-PILOT COMMUNICATIONS COMPANY OF COLORADO	BLH19991214ABH	C1	LIC	138.22	0	20.06 dB	71767
KRFX	CO	DENVER	278	100000	JACOR BROADCASTING OF COLORADO, INC.	BLH4823	C	LIC	142.16	0	20.54 dB	29731
NEW	CO	MARSHALL	280	10	WAY-FM MEDIA GROUP, INC.	BNPFT20030310AXN	D	APP	140.31	0	21.42 dB	140166
NEW	CO	FORT COLLINS	280	10	EDGEWATER BROADCASTING INC.	BNPFT20030317CYC	D	APP	132.6	0	21.47 dB	151251
NEW	CO	LONGMONT	280	4	HORIZON CHRISTIAN FELLOWSHIP	BNPFT20030317AZL	D	APP	121.81	0	22.40 dB	140185
	WY	CHEYENNE	280	0		RMspm94	C1	APP	120.36	0	22.76 dB	0
NEW	CO	FT. COLLINS	280	10	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	BNPFT20030312ADT	D	APP	129.82	0	23.10 dB	140262
	CO	AKRON	279	0		RM10630	C1	APP	65.21	0	24.70 dB	0
KYZX	CO	PUEBLO WEST	280	1750	COLORADO SPRINGS RADIO B/CASTRS, INC	BLH19990428KE	C2	LIC	191.8	0	25.82 dB	53845
NEW	WY	CHEYENNE	280	100	GREENE VALLEY CHURCH, INC.	BNPL20000831ABC	LP100	APP	139.06	24	25.03 dB	126459
NEW	CO	PLEASANT VIEW	280	5	MARY V. GUTHRIE	BNPFT20030317BTF	D	APP	143.26	0	25.74 dB	153977
	WY	CHEYENNE	280	0		RM9071	C2	APP	138.79	0	26.15 dB	0
	WY	CHEYENNE	280	0		RMspm94	C2	APP	138.79	0	26.15 dB	0
	CO	AKRON	279	0		RM10630	C0	APP	71.16	0	26.20 dB	0
NEW	CO	SEDALIA	280	100	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	BNPFT20030312ALY	D	APP	148.1	0	26.95 dB	138290
NEW	CO	GOLDEN	280	11	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	BNPFT20030312AGT	D	APP	151.2	0	26.97 dB	140234
	WY	CHEYENNE	280	0		RM10630	C1	APP	150.15	0	28.15 dB	0
NEW	CO	BLACK HAWK	280	13	KEVIN NELSON	BNPFT20030317HJN	D	APP	165.54	0	29.49 dB	154318
KOZY-FM NE	GERING		280	7000	TRACY BROADCASTING CORPORATION	BLH19960807KE	C3	LIC	182.87	0	30.14 dB	67473
DK280AU CO	COLORADO SPRIN		280	115	CLASSICAL COMMUNICATIONS, INC.	BLFT286	D	LIC	188.92	0	31.36 dB	11866
K280BM WY	LARAMIE		280	80	LARAMIE PLAINS ANTENNA TV ASSN., INC	BLFT19840723MU	D	LIC	187.44	0	32.40 dB	36554
KOZY-FM NE	GERING		280	0	TRACY BROADCASTING CORPORATION		C3	USE	178.94	0	33.06 dB	67473
KNAB-FM CO	BURLINGTON		281	51000	KNAB, INC.	BLH19900222KD	C1	LIC	160.1	0	33.32 dB	35205
NEW	NE	CHAPPELL	281	250	TRI-STATE BROADCASTING ASSOCIATION, INC.	BNPFT20030317LKG	D	APP	141.84	0	37.98 dB	152935
KYZX	CO	PUEBLO WEST	280	0	COLORADO SPRINGS RADIO B/CASTRS, INC		C2	USE	195.37	0	38.31 dB	53845
NEW	WY	WARREN AFB	279	34	EDGEWATER BROADCASTING INC.	BNPFT20030317BVB	D	APP	147.88	0	39.30 dB	154329
NEW	WY	WARREN AFB	281	34	EDGEWATER BROADCASTING INC.	BNPFT20030317BVA	D	APP	147.88	0	39.30 dB	154336