

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317DRE

Channel: 280

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 4 of this exhibit.

Page 3 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference protection provisions based on 47 CFR 74.1204(d), which states:

"an 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."

In addition, page 3 includes a tabulation of the second and third adjacent stations which this application is required to protect and the field strengths of those stations in the vicinity of the proposed translator. The field strengths given were based on contours predicted using FCC contour algorithms and 3 arc second terrain data.

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.

Page 4 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application had to consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

Page 5 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 min quadrangle at full scale with the calculated area of interference overlayed. 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 a free-space calculation (see FCC 98-117, Appendix A, pg. 41 for reference to the equation used).

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 10 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 red are those stations where there is overlap of predicted contours and lack of population has been demonstrated within the area of interference.

Compliance with 47 CFR 74.1204(d)

The proposed translator's Maximum Effective Radiated Power (ERP) is 0.01kW at 56 meters above ground level. According to 47 CFR, 74.1204(a), the desired to undesired ratio between 2nd/3rd adjacent stations is 40dB, making the proposed translator's interfering contour 113.5dBu F(50,10).

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), this proposed translator's F(50,10) interference contour was calculated and the maximum horizontal plane was plotted on the pertinent portion of a USGS quadrangle (page 5 of this exhibit). However, the proposed translator's area of interference extends a maximum of 46.9 meters from the transmit antenna. Since the translator's center of radiation is 56 meters above ground level, the area of interference will be at least 9.1 meters above tower ground level (TGL) at the lowest point. The applicant has taken into account USGS quadrangles and relevant aerial photography in stating that no structures, except possibly tower support structures, puncture the proposed area of interference. Hence, in accordance with 47 CFR 74.1204(d) and the clarification provided by the FCC in the decision Re: Living Way Ministries (FCC 02-244), there is a lack of population within the proposed area of interference and therefore this application is in full compliance with 47 CFR 74.1204.

CORAGL: 56m
Maximum ERP: 0.01kW

F(50,10) Interfering Contour: 113.5dBu
F(50,10) Max Distance: 46.9m

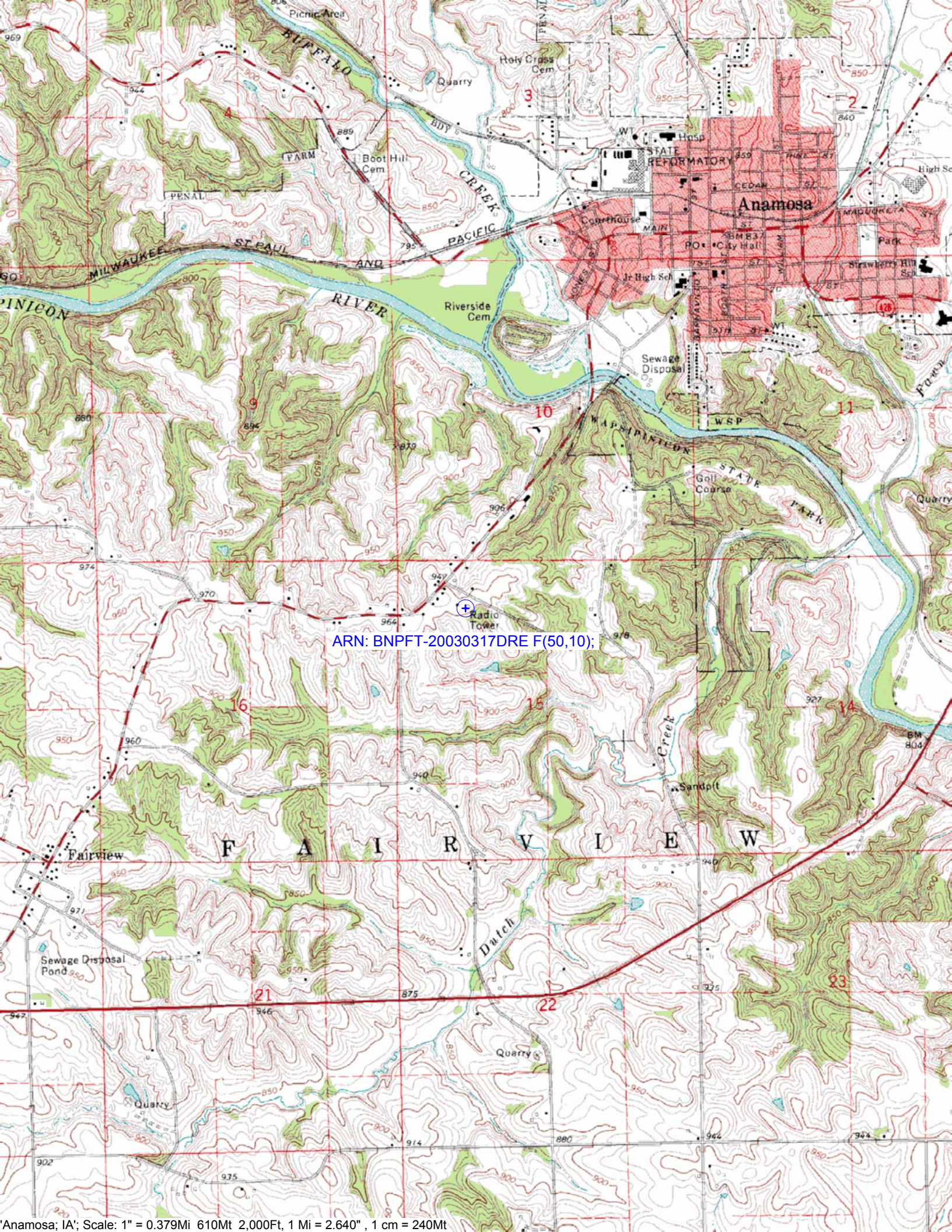
Antenna Manufacturer: SWR
Antenna Model: FM1

F(50,10) Clearance above TGL: 9.1m

The F(50,50) signal strength of all relevant second and third adjacent stations have been examined, and are tabulated below. Column three shows the station's signal level at the proposed translator's tower site, and column four gives the minimum value within the entire proposed translator's standard F(50,10) contour (100 dBu for most classes, 94 dBu for class B's, 97 dBu for class B1's). For signal levels too great to determine, 999 was entered. The minimum F(50,50) contour within the proposed translator's standard F(50,10) contour was used to calculate the proposed translator's interference contour, thereby assuring a minimum undesired-to-desired ratio of 40dB for all relevant adjacent stations, as required in 47 CFR, 74.1204(a).

FCC File Number	Call Sign	F(50,50) Contour at Tower	Min. F(50,50) Contour
BLH5113	KDAT	74dBu	73.5dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			73.5dBu

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Facility_id	Class	Status	Distance_km	Clr
KDAT	IA	CEDAR RAPIDS	283	100000	CUMULUS LICENSING CORP.	BLH5113	54165	C1	LIC	46.91	-6.77 dB
WLLR-FM	IA	DAVENPORT	279	91000	CITICASTERS LICENSES, L.P.	BLH19821112AR	60361	C	LIC	93.88	3.97 dB
WJOD	IA	ASBURY	277	6600	CUMULUS LICENSING CORP.	BLH19940401KC	34596	C3	LIC	52.78	8.90 dB
NEW	IA	DUBUQUE	281	62	EDGEWATER BROADCASTING INC.	BNPFT20030317DEZ	151550	D	APP	39.87	13.56 dB
NEW	WI	PRAIRIE DU CHIEN	280	10	EDGEWATER BROADCASTING INC.	BNPFT20030317HCP	154162	D	APP	91.96	15.96 dB
NEW	IA	MAQUOKETA	281	75	EDGEWATER BROADCASTING INC.	BNPFT20030317DFS	151573	D	APP	47.79	15.21 dB
NEW	IA	HIAWATHA	281	140	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030313BLD	140542	D	APP	52.52	16.06 dB
NEW	IA	IOWA CITY	281	115	EDGEWATER BROADCASTING INC.	BNPFT20030317DFJ	151566	D	APP	59.68	17.62 dB
	IA	DUNKERTON	280	0			106498	A	APP	96.21	19.03 dB
NEW	IA	SPRINGVILLE	227	100	SPRINGVILLE COMMUNITY SCHOOL DISTRICT	BNPL20010615APT	135448	LP100	APP	29.8	22.8
NEW	IA	DECORAH	280	62	EDGEWATER BROADCASTING INC.	BNPFT20030317DER	151537	D	APP	132.49	23.98 dB
KNEI-FM	IA	WAUKON	278	37000	WENNES COMMUNICATIONS STATIONS, INC.	BLH20010627AAZ	15734	C2	LIC	123.19	28.40 dB
WZEE	WI	MADISON	281	12000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19980716KB	41980	B	LIC	165.37	28.03 dB
NEW	IA	MUSCATINE	281	92	EDGEWATER BROADCASTING INC.	BNPFT20030317DFY	151686	D	APP	85.46	28.11 dB
NEW	IA	DAVENPORT	281	15	EDGEWATER BROADCASTING INC.	BNPFT20030317DEN	151532	D	APP	93.89	29.96 dB
NEW	WI	PRAIRIE DU CHIEN	281	10	EDGEWATER BROADCASTING INC.	BNPFT20030317HCK	154158	D	APP	93.38	29.96 dB
NEW	IA	PELLA	280	115	HOLCOMB INTERNATIONAL MINISTRIES	BNPFT20030314BEA	144645	D	APP	169.89	29.58 dB
NEW	IA	SOUTH CLINTON	281	250	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030317FZK	145082	D	APP	89.01	29.36 dB
NEW	IA	DAVENPORT	281	250	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030313BEE	144980	D	APP	86.74	29.01 dB
NEW	WI	LA CROSSE	280	10	EDGEWATER BROADCASTING INC.	BNPFT20030317HBN	154120	D	APP	176.84	31.38 dB
NEW	IA	OTTUMWA	280	15	EDGEWATER BROADCASTING INC.	BNPFT20030317DGE	151695	D	APP	174.24	31.38 dB
NEW	IL	ROCKFORD	280	250	CATHOLIC DIOCESE OF ROCKFORD	BNPFT20030317BIR	153348	D	APP	173.72	31.38 dB
NEW	IL	ROCKFORD	280	250	SISTER GRACE, INC.	BNPFT20030317AWC	152773	D	APP	170.44	31.38 dB
NEW	IL	ROCKFORD	280	55	NORTHWESTERN COLLEGE	BNPFT20030314CEW	139265	D	APP	173.01	31.38 dB
	WI	WESTBY	280	0		RM9170	0	A	APP	160.56	31.38 dB
WLLR-FM	IA	DAVENPORT	279	0	CITICASTERS LICENSES, L.P.		60361	C	USE	93.88	32.00 dB
NEW	IA	DUBUQUE	282	200	E-STRING WIRELESS, LTD	BNPFT20030317HNQ	156474	D	APP	54.22	33.32 dB
NEW	IA	DUBUQUE	282	250	STARBOARD MEDIA FOUNDATION, INC.	BNPFT20030311ALR	142465	D	APP	50.55	33.76 dB
KAZR	IA	PELLA	277	100000	SAGA COMMUNICATIONS OF IOWA, LLC	BPH20011101AAX	28882	C0	CP	195.02	33.82 dB
NEW	IA	DUBUQUE	282	250	FRIENDSHIP COMMUNICATIONS, INC.	BNPFT20030313AJM	144087	D	APP	46.77	33.76 dB
NEW	IA	VICTOR	279	100	IOWA DEPARTMENT OF TRANSPORTATION	BNPL20010615AHJ	133668	LP100	APP	115.58	34.03 dB
NEW	IA	DECORAH	281	115	EDGEWATER BROADCASTING INC.	BNPFT20030317DEU	151543	D	APP	116.83	34.03 dB
	MN	LANESBORO	280	0			94776	A	APP	185.31	35.10 dB
NEW	MN	ST. CHARLES	280	140	EDGEWATER BROADCASTING INC.	BNPFT20030317DUB	152440	D	APP	199.14	35.10 dB
KAZR	IA	PELLA	277	100000	SAGA COMMUNICATIONS OF IOWA, LLC	BMLH19931025KA	28882	C1	LIC	193.06	35.34 dB
NEW	IL	DUNLAP	280	19	ILLINOIS ASSOCIATION OF SEVENTH-DAY ADVENTISTS	BNPFT20030314CIJ	141895	D	APP	200.63	36.97 dB
K280EI	MN	WINONA	280	140	MARATHON MEDIA GROUP, L.L.C.	BLFT19950811TA	63808	D	LIC	204.9	36.97 dB
NEW	IA	DUBUQUE	282	13	NORTHWESTERN COLLEGE	BNPFT20030314CHD	139153	D	APP	55.79	37.61 dB
NEW	IL	STERLING	281	10	EDGEWATER BROADCASTING INC.	BNPFT20030317DLD	151884	D	APP	132.6	37.98 dB
KDAT	IA	CEDAR RAPIDS	283	0	CUMULUS LICENSING CORP.		54165	C1	USE	46.91	37.74 dB
WZCH	IL	DUNDEE	280	2550	ENTRAVISION HOLDINGS, LLC	BLH19930222KC	3135	A	LIC	230.36	38.70 dB
NEW	IA	CEDAR RAPIDS	226	100	QUEEN OF PEACE EDUCATIONAL ASSOCIATION	BNPL20010613AFO	133408	LP100	APP	45.09	38.1
KLTI-FM	IA	AMES	281	100000	SAGA COMMUNICATIONS OF IOWA, LLC	BLH19861229KC	7823	C	LIC	229.86	38.49 dB
WZEE	WI	MADISON	281	0	CAPSTAR TX LIMITED PARTNERSHIP		41980	B	USE	166.06	39.38 dB
NEW	IA	MARSHALLTOWN	279	50	EDGEWATER BROADCASTING INC.	BNPFT20030317DFW	151684	D	APP	148.23	39.89 dB



ARN: BNPFT-20030317DRE F(50,10);