

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317JYC

Channel: 296

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:

- Since the proposed station's Effective Radiated Power (ERP) is 19 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.

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Cir	Facility_id
	WI	MARSHFIELD	293	100000	NEWRADIO GROUP, LLC	BLH19800212AD	C1	LIC	83.08	6.15 dB	24444
	WI	TIGERTON	295	0		RM10561	A	APP	21.46	12.80 dB	0
WJLW	WI	ALLOUEZ	294	25000	CUMULUS LICENSING CORP	BLH19970102KA	C3	LIC	72.09	13.44 dB	31912
WOCO-FM	WI	OCONTO	296	3000	LAMARDO INC.	BLH4131	A	LIC	71.8	14.78 dB	36465
WXWX	WI	BRILLION	298	3600	CUMULUS LICENSING CORP.	BLH19990521KC	C3	LIC	73.85	14.70 dB	6861
NEW	WI	STEVENS POINT	296	80	WRVM, INC.	BNPFT20030313AWN	D	APP	67.69	15.76 dB	140995
NEW	WI	STEVENS POINT	296	13	RADIO ASSIST MINISTRY INC.	BNPFT20030317JVS	D	APP	64.28	17.55 dB	155983
NEW	WI	WAUPACA	297	55	EVANGEL MINISTRIES, INC.	BNPFT20030317KTM	D	APP	40.3	20.70 dB	144858
KFIZ-FM	WI	FOND DU LAC	296	3000	RBH ENTERPRISES, INC.	BLH3824	A	LIC	98.62	20.54 dB	36420
WOCO-FM	WI	OCONTO	296	0	LAMARDO INC.		A	USE	71.8	21.19 dB	36465
NEW	WI	NEKOOSA	296	38	RADIO ASSIST MINISTRY INC.	BNPFT20030317JWL	D	APP	95.14	24.83 dB	155972
NEW	WI	APPLETON	295	38	FAMILY ED BROADCASTING CORPORATION OF DOOR COUNTY WISCONSIN	BNPFT20030311AST	D	APP	52.92	25.75 dB	139290
NEW	WI	MARSHFIELD	296	27	RADIO ASSIST MINISTRY INC.	BNPFT20030317JWS	D	APP	104.19	27.14 dB	155971
WCCN-FM	WI	NEILLSVILLE	298	100000	CENTRAL WISCONSIN B/CG INC.	BLH19980513KC	C1	LIC	144.1	28.37 dB	10029
KFIZ-FM	WI	FOND DU LAC	296	0	RBH ENTERPRISES, INC.		A	USE	98.62	28.00 dB	36420
W296AD	WI	EAGLE RIVER	296	55	CROSS COMMUNICATIONS, INC.	BPFT20030529AMP	D	APP	138.48	31.08 dB	14549
WLBI-LP	WI	TOMAHAWK	296	100	TOMAHAWK LIGHT BROADCASTING, INC.	BNPL20010122AKX	LP100	CP	113.83	31.15 dB	132459
NEW	WI	STEVENS POINT	295	13	RADIO ASSIST MINISTRY INC.	BNPFT20030317JVX	D	APP	64.28	31.55 dB	155981
WCCN-FM	WI	NEILLSVILLE	298	100000	CENTRAL WISCONSIN B/CG INC.	BMLH19960227KC	C1	LIC	141.76	31.87 dB	10029
NEW	WI	CASHTON	296	250	PENE L. KUNAU	BNPFT20030317MUC	D	APP	188.68	33.11 dB	156249
NEW	WI	WAUTOMA	297	27	WRVM, INC.	BNPFT20030313AUQ	D	APP	74.5	33.55 dB	143483
W296AD	WI	EAGLE RIVER, ET	296	23	CROSS COMMUNICATIONS, INC.	BLFT19850204TB	D	LIC	138.34	34.95 dB	14549
WVCY-FM	WI	MILWAUKEE	299	43000	VCY AMERICA, INC.	BLED20010710AAS	B	LIC	198.57	35.69 dB	73059
WSJY	WI	FORT ATKINSON	297	26000	MARATHON MEDIA GROUP, L.L.C.	BLH19900817KC	B	LIC	208.58	36.06 dB	24442
NEW	WI	APPLETON	293	250	SISTER GRACE, INC.	BNPFT20030317FPU	D	APP	56.23	37.61 dB	156054
WNNO-FM	WI	WISCONSIN DELL	295	6000	MAGNUM COMMUNICATIONS, INC.	BMLH20020318AAS	A	LIC	135.76	39.29 dB	2806
NEW	WI	ANTIGO	294	100	ST. JOHN EDUCATIONAL ASSOCIATION	BNPL20010122AFY	LP100	APP	55.74	39.51 dB	132163