

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 150562

Channel 237

### **Description of Exhibit 12 Contents**

This exhibit demonstrates that the proposed facility complies with contour overlap and interference protection provisions in all of the applicable rule sections and that this application for a construction permit is in full compliance with 47 C.F.R. § 74.1204.

**Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.**

Page 2 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference provisions based on 47 C.F.R. § 74.1204(d), which states:

*[A]n 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.*

Page 3 of this exhibit contains the tabulated data from the interference analysis, which shows all stations whose protected contours come within 50 km of the 34 dB $\mu$  F(50,10) contour of the proposed translator. These tabulated values were calculated using data from the FCC's CDBS files and 30 arc second terrain data. The column labeled "Adj" shows the number of channels difference between the entry and the proposed translator. The column labeled "Dist" shows the distance in km. The column labeled "Overlap" shows the area of contour overlap in square kilometers.

Page 4 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 minute quadrangle at full scale with the calculated area of interference overlaid. 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 the free space equation and 120 radials.

**Note: The quadrangle indicates the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision and therefore "lack of population" is demonstrated.**

## Compliance with 47 C.F.R. § 74.1204(d)

All authorized second and third adjacent stations with which the proposed translator has contour overlap are tabulated below. Column four show the station's signal level at the proposed translator's tower site, and column five gives the minimum value within the entire standard interfering contour of the proposed translator (100 dB $\mu$  for most classes, 94 for class B, 97 for class B1). The minimum second or third adjacent F(50,50) contour within the proposed translator's standard interfering contour was used to calculate the proposed translator's actual "worst-case" interfering contour.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1005414	BMLH20041227ACE	KIOK	61.5	61.1
37436	BLH19811222AI	KNLT	101.7	100.9

Minimum F(50,50) Contour of Adjacent Station within  
Proposed Translator's Standard Interfering Contour **61.1**

FCC 02-244 at Section II.A.5 states that "when demonstrating that 'no actual interference will occur due to . . . other factors,' pursuant to Section 74.1204(d), an applicant may use the undesired-to-desired signal ratio method." The undesired-to-desired ratio for second and third adjacent stations required by § 74.1204(a) is 40 dB. Since the minimum protected contour strength within the proposed translator's standard interference contour is **61.1 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **101.1 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **884.9 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population"). Hence, in accordance with 47 C.F.R. § 74.1204(d) and the clarification provided by the FCC in the decision *Re: Living Way Ministries* (FCC 02-244), a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

**Note: The quadrangle indicates the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision and therefore "lack of population" is demonstrated.**

**Antenna Manufacturer:** SCA  
**Antenna Model:** FMVMP  
**CORAGL:** 42 m  
**Maximum ERP:** 0.205 kW  
**Interfering Contour:** 101.1 dB $\mu$   
**Max Int. Contour Distance:** 884.9 m

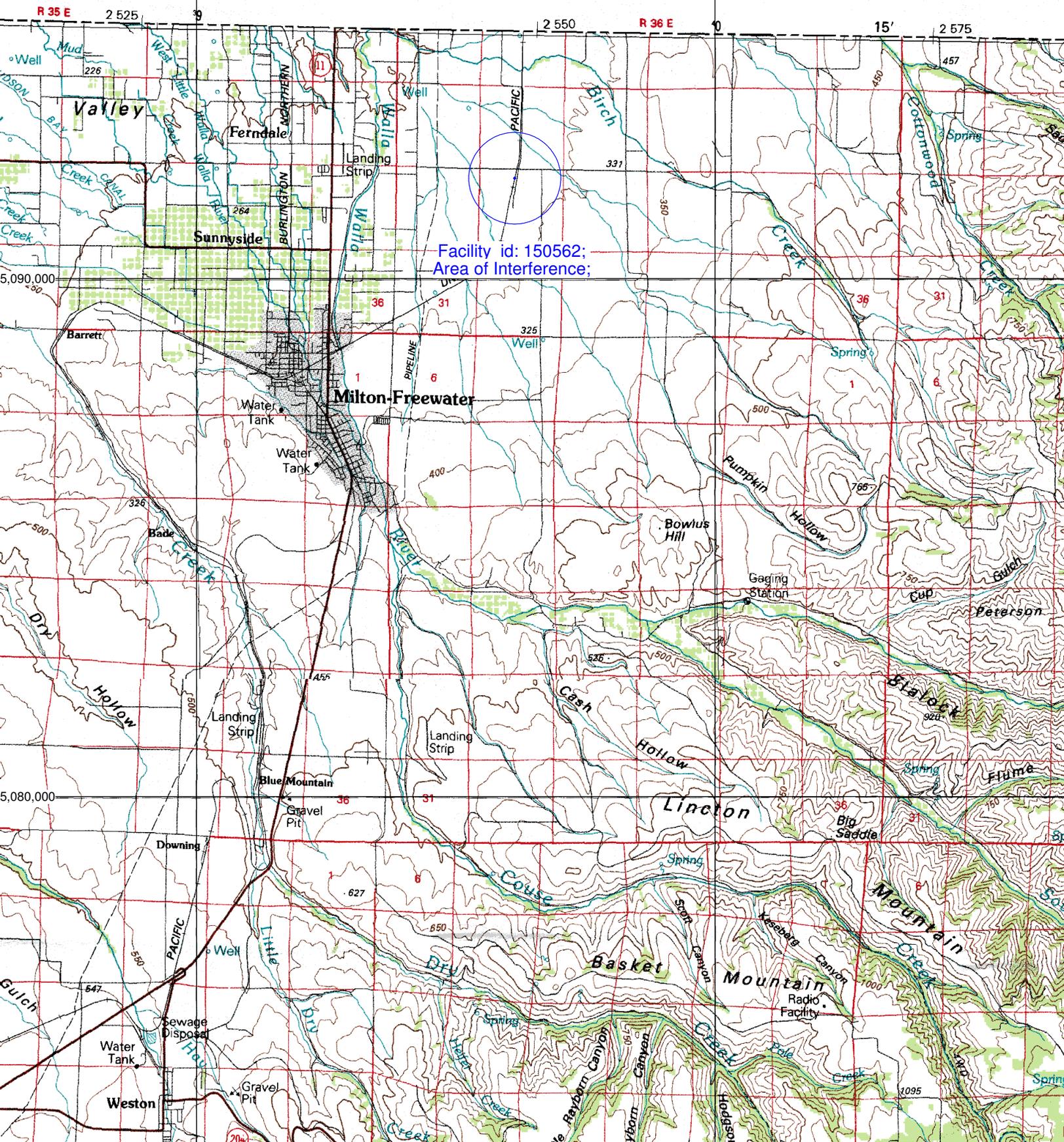
## Adjacent Channel Study For Station K237DM, Facility\_id: 150562

### Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
37436	35717	BLH	19811222AI	KNLT	KUJ LIMITED PARTNERSHIP	C	WALLA WALLA	WA	LIC	94	1221	239	2	13.3	1.2233
1005414	12455	BMLH	20041227ACE	KIOK	NEW NORTHWEST BROADCASTERS LLC	C	RICHLAND	WA	LIC	100	736	235	2	67.2	1.2233
74032	12455	BLH	19841113KW	KIOK	TRIATHLON B/C OF TRI-CITIES LIC INC	C	RICHLAND	WA	LIC	4.6	130	235	2	65.6	0
1131219	150553	BLFT	20060524AHZ	K237DP	JEFF HUFFMAN	D	KENNEWICK	WA	LIC	0.034	379	237	0	66.1	0
682928	147992	BNPFT	20030828ACF	K237DS	EDGEWATER BROADCASTING, INC.	D	HERMISTON	OR	CP	0.075	293	237	0	69.3	0
1132161	12455	BXPH	20060605ABO	KIOK	NEW NORTHWEST BROADCASTERS LLC	C	RICHLAND	WA	CP	4.6	170.1	235	2	70.7	0
210445	70757	BLFT	19950615TD	K234AD	WALLOWA VALLEY TV ASSOCIATION, INC.	D	ENTERPRISE	OR	LIC	0.01	2103	234	3	97.9	0

### Intermediate Frequencies (53 and 54 channels difference):

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
1104995	164224	BLH	20051006ABI	KRJT	PACIFIC EMPIRE RADIO CORP.	A	ELGIN	OR	LIC	0.115	1641	290	53	68.9	58.9
683420	150548	BNPFT	20030828BCL	K291BE	EDGEWATER BROADCASTING, INC.	D	CONNELL	WA	CP	0.19	372	291	54	88.3	78.3



Facility id: 150562;  
Area of Interference;