

Exhibit 12

Non-Interference Compliance

Channel: 270

Reference to: FCC File Number: BLFT-20080228ABU (Licensed Translator)
W270BR (Current Call Sign). This Application Proposes to Modify Translator Site.

Description of Exhibit 12 Contents

This exhibit will show that the proposed facility complies with contour overlap interference protection provisions in 47 CFR 74.1204.

Specifically we will show compliance because the Proposed ch. 270 Translator is fully spaced with all domestic and international stations, applications, and allotments.

The applicant certifies that should any actual interference occur, operation of the translator will be suspended in accordance with 47 CFR 74.1203.

Page 3, Exhibit 12(a), displays the F(50/50) 60 dbu of the proposed channel 270 modified transmitter site, overlapping the F(50/50) 60 dbu of the original W270BR Licensed Facilities, thus compliance with CFR, 74.1233(a) (2).
Please note that the Primary Station is (WCKJ-FM)

Page 4, Exhibit 12(b), is a Table showing the distance to the F (50/50) 60 dbu contour of the Proposed 101.9 Translator, prepared using ComStudy 2.2. *(Also note the HAAT Column of this Exhibit for Reference)

Page 5, Exhibit 12(c), is a Table showing the distance to the Proposed ch. 270 Translator's F(50,10) 34 dBu Interfering Contour.

Page 6, Exhibit 12(d), is a Topographical map of the area around the proposed channel 270 translator site.

Since the proposed channel 270 translator is about 25 kilometers from the Canadian Border, the applicant certifies that the 50/10, 34 dbu contour does not extend beyond 60 kilometers in any direction, in compliance with CFR 47, Sec. 74.1235 (d)3, which states that "the distance to the 34 dbu interfering contour may not exceed 60 kilometers in any direction", and hence is in compliance with 47 CFR 74.1204(h). (see page 3, Exhibit 12(a), and page 5, Exhibit 12(c))

Cont...

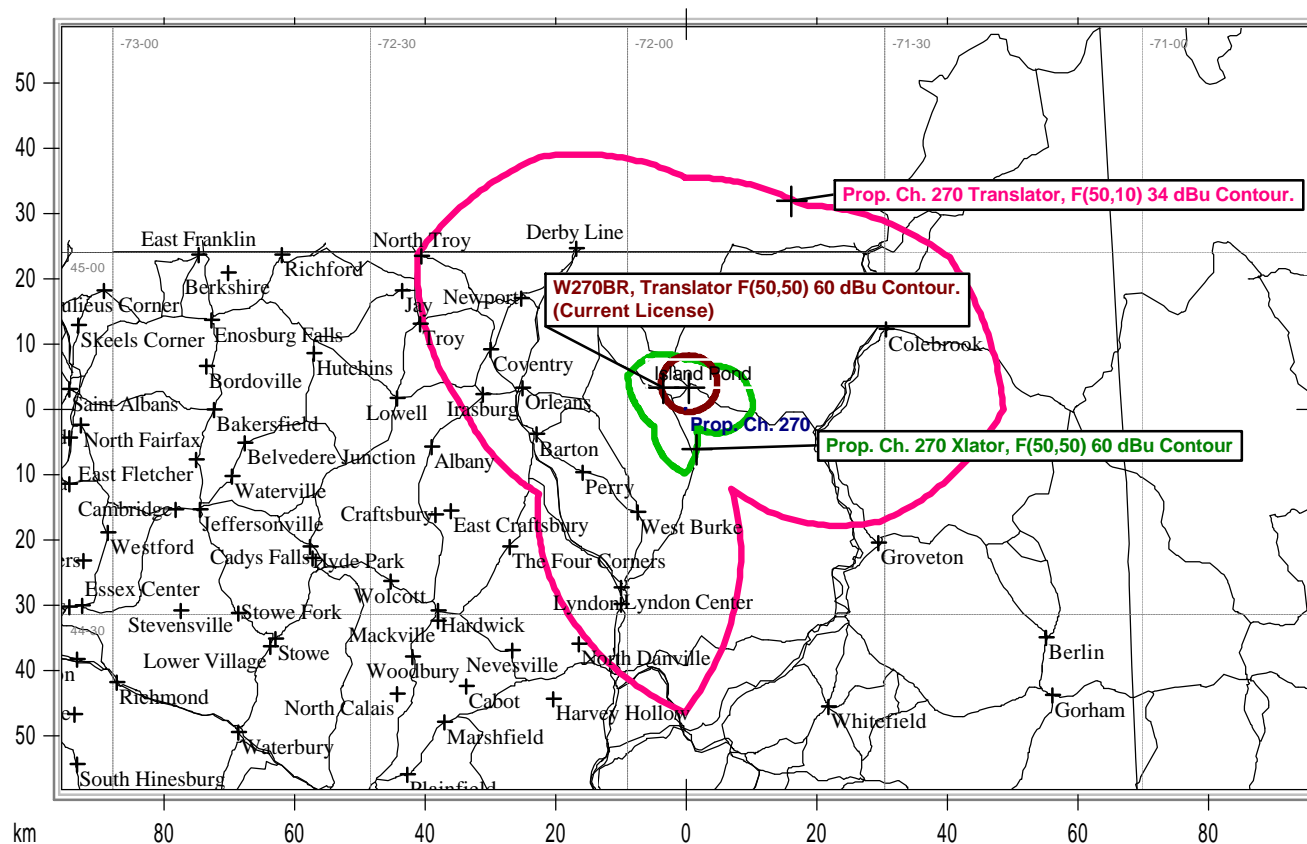
Explanation of ComStudy Frequency Finder Results:

The Interference analysis for the instant application was performed using data taken directly from the FCC's FM database, which looks for prohibited overlap with contours of adjacent stations, and prohibited proximity to stations 53 or 54 channels from the proposed translator station (IF) using 3 arc second terrain data and the FCC's contour algorithms. See results of analysis in Table on Page 7, Exhibit 12(e). (ComStudy uses the FCC's FM Database, thus the results included the proposed translator. This line was deleted from the Table to save confusion) The results show the proposal is fully spaced to all domestic, and international stations, applications, and allotments.

The proposed channel 270 Translator can operate with an effective radiated power of 10-watts at 11 meters AGL. . (see page 3, Exhibit 12(a) Contour Study) (For reference HAAT on the 12 required radials, see page 3, Exhibit 12 (a) and note the HAAT column)

The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). (See page 8, Exhibit 12(f), RF Worksheet)

Proposal is fully spaced to all Domestic & International Stations, Applications, and Allotments



Note: 60 dBu Contour of Proposed, Overlaps 60 dBu Contour of Current License.

State Borders Highways Lat/Lon Grid

Ch. 270 Island Pond, Vt.
Distance to F(50,50) 60 dBu Contour

Site: Prop. Ch. 270
Coordinate 44-47-02.0 N, 71-53-14.0 W
Freq: 101.90000 MHz
ERP: 10.00 W

Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0	10	166	250	7.49	44.851284	-71.887222
30	10	172	240	7.5	44.85131	-71.885562
60	10	292	300	7.5	44.851324	-71.883901
90	10	320	540	7.51	44.851308	-71.882238
120	10	158	390	7.51	44.851281	-71.880575
150	10	-36	480	7.51	44.851224	-71.878912
180	10	293	270	7.52	44.851156	-71.877249
210	10	174	190	7.53	44.851067	-71.875587
240	10	91	240	7.53	44.850948	-71.873928
270	10	152	270	7.53	44.850818	-71.87227
300	10	302	200	7.54	44.850658	-71.870615
330	10	266	250	7.54	44.850486	-71.868962

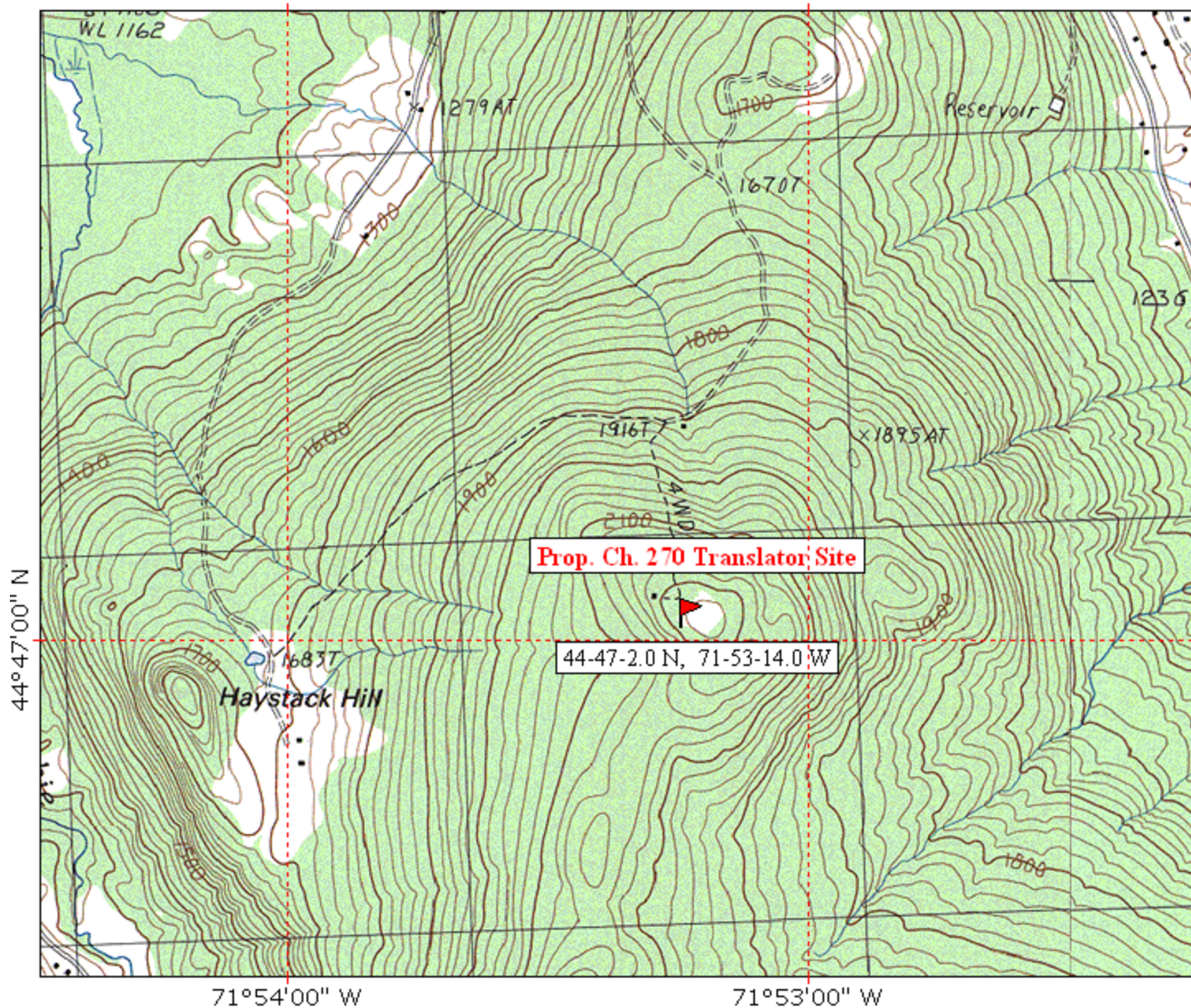
Ch. 270, Island Pond, Vt.
Distance to F(50,10) 34 dBu Contour

Site: Prop. Ch. 270
Coordinates: 44-47-02.0 N, 71-53-14.0 W
Freq: 101.90000 MHz
ERP: 10.00 W

Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0	10	166	250	35.42	45.102489	-71.887222
30	10	172	240	35.44	45.10262	-71.87934
60	10	292	300	35.46	45.102663	-71.871451
90	10	320	540	35.48	45.102607	-71.863558
120	10	158	390	35.5	45.102445	-71.855663
150	10	-36	480	35.52	45.102193	-71.847768
180	10	293	270	35.55	45.101844	-71.839876
210	10	174	190	35.57	45.101387	-71.831991
240	10	91	240	35.59	45.100841	-71.824112
270	10	152	270	35.61	45.100197	-71.816244
300	10	302	200	35.63	45.099447	-71.80839
330	10	266	250	35.65	45.098607	-71.80055

Topo Map of Prop. Ch. 270 Translator Site.
44-47-2.0 N, 71-53-14.0 W

TOPO! map printed on 09/02/08 from "NVermont.tpo" and "Untitled.tpg"
71°54'00" W 71°53'00" W



MN
16 1/2°



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Proposed Channel 270 Translator
Island Pond, Vermont
Frequency Separation Study

44-47-2.0 N **10 Watts ERP**
71-53-14.0 W **10 Meters AGL**

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
	QC	CHATEAUGUAY	101.9	270	0	A1		157.48	0	38.24 dB
	QU	BEDFORD	101.9	270	0	A		94.08	0	24.12 dB
	QU	CANDIAC	101.9	270	0	A1		145.23	0	35.05 dB
	QU	VICTORIAVILLE	101.9	270	0	A		139.24	0	36.87 dB
880720ML	NH	LANCASTER	102.3	272	0	C3	USE	52.59	0	39.76 dB
CHAIMF	QU	CHATEAUGUAY	101.9	270	50	D		157.48	0	35.30 dB
CHAIMF*	QU	CHATEAUGUAY	101.9	270	0	A1		157.48	0	38.24 dB
NEW	QU	SHERBROOKE	102.1	271	23000	B		73.67	0	11.57 dB
W270AH	NH	PETERBOROUGH	101.9	270	250	D	LIC	211.54	0	38.49 dB
WCPV	NY	ESSEX	101.3	267	1000	A	LIC	129.89	0	39.27 dB
WCVR-FM	VT	RANDOLPH	102.1	271	11000	C3	LIC	108.38	0	28.72 dB
WCVT	VT	STOWE	101.7	269	0	C3	USE	53.84	0	24.03 dB
WCVT	VT	STOWE	101.7	269	400	C3	APP	84.93	0	14.42 dB
WCVT	VT	STOWE	101.7	269	500	C3	LIC	84.93	0	13.46 dB
WKCG	ME	AUGUSTA	101.3	267	41000	B	CP	171.69	0	32.54 dB
WKCG	ME	AUGUSTA	101.3	267	50000	B	LIC	171.29	0	32.14 dB
WLFE-FM	VT	GRAND ISLE	102.3	272	20000	C3	CP	134.63	0	30.82 dB
WLFE-FM	VT	ST. ALBANS	102.3	272	440	A	LIC	93.22	0	37.02 dB
WPOR	ME	PORTLAND	101.9	270	0	B	USE	168.63	0	37.93 dB
WPOR	ME	PORTLAND	101.9	270	33000	B	LIC	168.63	0	24.51 dB
WPOR	ME	PORTLAND	101.9	270	35000	B	CP	179.37	0	30.28 dB
WRNH	NH	GROVETON	101.5	268	6000	A	CP	50.1	0	19.96 dB
WRNH*	NH	GROVETON	101.5	268	0	A	APP	39.99	0	32.34 dB
WXXS	NH	LANCASTER	102.3	272	1500	C3	LIC	47.05	0	7.31 dB
WYKR-FM	NH	HAVERHILL	101.3	267	3000	A	LIC	74.86	0	24.68 dB

RF Worksheet #1 – FM (including translators & boosters)

PLEASE COPY BEFORE USING. THE DETERMINATION OF COMPLIANCE MAY INVOLVE REPEATED CALCULATIONS. IF LOCATED ON A MULTIPLE FM USER TOWER, PLEASE COMPLETE RF WORKSHEET 1A BEFORE PROCEEDING.

EFFECTIVE RADIATION CENTER HEIGHT

Enter proposed "height of radiation center above ground" OR as listed in Line 1 11 m (1)
of Worksheet 1A.

Is antenna supporting structure located on the roof of a building? (check one)

☐ Yes ☒ No (2)

If Line 2 is "Yes" enter the building height measured at the base of the antenna supporting structure in Line 3

If Line 2 is "No" enter "0" in Line 3..... 0 m (3)
Subtract Line (3) from Line (1)..... 11 m (4)
Subtract the value 2.0 from Line (4)..... 9 m (5)

TOTAL EFFECTIVE RADIATED POWER

(If "beam tilt" is utilized, list maximum values)

List Effective Radiated Power in the Horizontal Plane..... .01 kW (6)
List Effective Radiated Power in the Vertical Plane..... .01 kW (7)
Add Lines (6) and (7) OR list value from Line 2 in Worksheet 1A..... .02 kW (8)

PERCENTAGE OF FCC RF LIMIT(S) FOR MAXIMUM PERMISSIBLE EXPOSURE

Multiply Line (8) by 33.41668 (9)
Multiply the value listed in Line (5) by itself..... .81 (10)
Divide Line (9) by Line (10)008 (11)
Multiply Line (11) by (100)80 (12)

DETERMINATION OF COMPLIANCE WITH CONTROLLED/OCCUPATIONAL LIMIT

Does Line (12) exceed 100%..... ☐ Yes ☒ No (13)

IF YOU ANSWERED "YES" IN LINE (13), THE WORKSHEETS MAY NOT BE USED IN THIS CASE.*

IF YOU ANSWERED "NO" IN LINE (13), THEN THE SITE SHOULD COMPLY WITH THE FCC'S CONTROLLED/OCCUPATIONAL RF EXPOSURE LIMITS FOR GROUND LEVEL EXPOSURE

*In this case, you may need to prepare an Environmental Assessment. See Instructions for Section III-C FCC Form 301.

DETERMINATION OF COMPLIANCE WITH THE UNCONTROLLED/GENERAL POPULATION LIMIT

Does Line (12) exceed 20%..... ☐ Yes ☐ No (14)