

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030825AGD

Channel: 255

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	Clr	Facility_id
KRDF-FM	TX	SPEARMA	252	17600	SPEARHE	BPH20030	C2	CP	56.31	0.84 dB	61684
KPRF	TX	AMARILLC	254	100000	CAPSTAR	BLH19781	C1	LIC	73.46	1.90 dB	9307
K201AY	TX	BORGER	201	67	TOP O' TE	BLFT1992	D	LIC	5.43	5.4	72170
KEFH	TX	CLAREND	257	44000	ROHO BR	BLH19990	C2	LIC	78.16	15.81 dB	77849
990830MJ	TX	PAMPA	201	6500	SALT & LI	BPED1999	C3	APP	33.4	21.4	94206
NEW	TX	PAMPA	252	75	RADIO AS	BNPFT200	D	APP	41.27	24.94 dB	154954
NEW	TX	PAMPA	252	75	RADIO AS	BNPFT200	D	APP	41.27	24.94 dB	154954
KRDF-FM	TX	SPEARMA	252	3000	SPEARHE	BLH7429	A	LIC	65.63	26.20 dB	61684
NEW	TX	DUMAS	252	92	RADIO AS	BNPFT200	D	APP	59.76	31.52 dB	154898
NEW	TX	PAMPA	201	10000	GREAT PL	BNPED200	C3	APP	43.1	31.1	123060
NEW	TX	CHILDRE	255	75	EDGEWA	BNPFT200	D	APP	171.72	32.78 dB	154969
NEW	TX	CHILDRE	255	75	EDGEWA	BNPFT200	D	APP	171.72	32.78 dB	154969
KPRF	TX	AMARILLC	254	0	CAPSTAR	TX LIMITE	C1	USE	73.46	33.34 dB	9307
KTIJ	OK	ELK CITY	253	100000	FUCHS R/	BLH19990	C	LIC	195.22	34.38 dB	70631
KJIL	KS	COPELAN	256	100000	GREAT PL	bled1992	C1	LIC	214.89	35.74 dB	24987
NEW	TX	DUMAS	252	10	RADIO AS	BNPFT200	D	APP	59.76	36.55 dB	154898
NEW	TX	AMARILLC	252	250	GRACE C	BNPFT200	D	APP	61.6	38.96 dB	142017