

[Exhibit 12]

## **Non-Interference Compliance**

For an Open Site

Regarding FCC File Number: BNPFT-20030317FGR

### **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 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 "LPM 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.

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
WRNO-FM	LA	NEW ORLEANS	258	100000	CLEAR CHANNEL BROADCASTING LIC	BLH19860224KD	C	LIC	87.03	5.98 dB	54890
WNSL	MS	LAUREL	262	100000	CLEAR CHANNEL BROADCASTING LIC	BPH20020808ADP	C	APP	109.61	10.85 dB	16784
NEW	LA	SLIDELL	260	10	EDGEWATER BROADCASTING INC.	BNPFT20030317FHI	D	APP	54.64	11.82 dB	153132
WNSL	MS	LAUREL	262	100000	CLEAR CHANNEL BROADCASTING LIC	BLH19850701LE	C	LIC	109.61	14.46 dB	16784
NEW	LA	NEW ORLEANS	260	120	EDGEWATER BROADCASTING INC.	BNPFT20030317FHD	D	APP	90.51	18.95 dB	153127
NEW	LA	SLIDELL	261	80	CRISIS PREGNANCY HELP CENTER OF	BNPFT20030312BAQ	D	APP	50.9	24.59 dB	142403
WMXC	AL	MOBILE	260	94000	CLEAR CHANNEL BROADCASTING LIC	BLH19880509KE	C	LIC	195.18	26.09 dB	8696
KLRZ	LA	LAROSE	262	100000	COASTAL BROADCASTING OF LAROSE	BPH20011004AAL	C1	APP	156.4	27.74 dB	19212
WJMI	MS	JACKSON	259	98000	URBAN RADIO OF MISSISSIPPI, L.L.C.	BLH7788	C	LIC	172.68	28.63 dB	50408
WHER	MS	HEIDELBERG	257	50000	CLEAR CHANNEL BROADCASTING LIC	BLH19930114KC	C2	LIC	128.64	28.34 dB	52618
KLRZ	LA	LAROSE	262	100000	COASTAL BROADCASTING OF LAROSE	BPH20011004AAL	C1	APP	142.42	28.05 dB	19212
KTDY	LA	LAFAYETTE	260	100000	REGENT BROADCASTING OF LAFAYET	BLH19980323KF	C	LIC	193.76	30.58 dB	12674
NEW	LA	COVINGTON	262	100	COVINGTON HIGH SCHOOL	BNPL20000608ADY	LP100	CP	39.54	32.34 dB	124795
KLRZ	LA	LAROSE	262	50000	COASTAL BROADCASTING OF LAROSE	BLH19961004KA	C2	LIC	141.14	32.89 dB	19212
KTDY	LA	LAFAYETTE	260	100000	REGENT BROADCASTING OF LAFAYET	BXPH20011120AAO	C1	CP	193.76	33.46 dB	12674
NEW	LA	SLIDELL	262	80	SLIDELL MEDIA PARTNERSHIP	BNPFT20030317GFE	D	APP	54.64	37.20 dB	156125
WGON-LP	LA	SLIDELL	262	100	CRISIS PREGNANCY HELP CENTER OF	BPL20030310BKB	LP100	APP	50.9	39.76 dB	124637