

Non-Interference Compliance

Regarding Facility id 150493

Channel 240

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 dBμ 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.

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 dBμ 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
148538	BLH19900518KD	KSCS	68	68
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				68

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 **68 dBμ**, this makes the proposed translator's worst-case interfering contour **108 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **441.5 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.

Antenna Manufacturer:	NIC
Antenna Model:	BKG88
CORAGL:	20 m
Maximum ERP:	0.25 kW
Interfering Contour:	108 dBμ
Max Int. Contour Distance:	441.5 m

Adjacent Channel Study **For Station K240DS, Facility_id: 150493**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
148538	71201	BLH	19900518KD	KSCS	WBAP-KSCS OPERATING, LTD.	C	FORT WORTH	TX	LIC	99	680	242	2	65.6	1.4918
630426	139510	BNPFT	20030313BMS	NEW	EDUCATIONAL MEDIA FOUNDATION	D	LANCASTER	TX	APP	0.25	215	239	1	49.1	0
1003816	156925	BNPFT	20030829BBA	NEW	E-STRING WIRELESS, LTD	D	CANTON	TX	APP	0.25	226	239	1	55.6	0
650219	156925	BNPFT	20030317JMB	NEW	E-STRING WIRELESS, LTD	D	CANTON	TX	APP	0.25	226	239	1	55.6	0
634126	142322	BNPFT	20030317KZZ	NEW	TEXAS CHRISTIAN UNIVERSITY	D	DALLAS	TX	APP	0.09	260	238	2	56.8	0
157391	24176	BMLH	19910214KA	KSCH	NINETY-FIVE NINE, INC.	A	SULPHUR SPRINGS	TX	LIC	6	236	240	0	76.7	0
1214038	9715	BSTA	20071018ALQ	KCKL	LAKE COUNTRY RADIO, LP	A	MALAKOFF	TX	APP	0.445	148.5	240	0	80.1	0
177833	9715	BLH	19921013KI	KCKL	CEDAR CREEK RADIO COMPANY, INC.	A	MALAKOFF	TX	LIC	6	198	240	0	80.1	0
631232	140032	BNPFT	20030314BNJ	NEW	EDUCATIONAL MEDIA FOUNDATION	D	VENUS	TX	APP	0.092	339	238	2	85.4	0
630995	41328	BLH	20030305AAB	KHYI	METRO BROADCASTERS-TEXAS, INC.	C2	HOWE	TX	LIC	15	487	237	3	85.8	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
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