

Exhibit 12

Non-Interference Compliance

Channel: 257

Reference to: FCC File Number: BLFT-20091019ACJ Licensed Translator W259BF, Jefferson, NH, Facility id 155261) This Application proposes a site modification to Berlin, New Hampshire, and frequency change, down two channel's. Designation of Commercial Primary Station changes to WKDR-AM.

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. 257 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 257 Translator overlapping the F(50/50) 60 dbu of the original W259BF Licensed Facilities, thus compliance with CFR, 74.1233(a) (2).

Please note that the Primary Station is (WKDR-AM), Berlin, NH. Received Via Internet.

Page 3, Exhibit 12(a) Shows that the F(50,50 60 dBu Contour of the Proposed Ch. 257 Translator, does not exceed the 2 mVm Daytime Contour of Primary Station WKDR-AM. (72 Radial Points were used in this portion of the study)

Page 4, Exhibit 12(b) Since the proposed channel 257 translator is about 64.7 kilometers from the Canadian Border, the applicant certifies that the 50/10, 34 dbu contour does not extend beyond the U.S. Border, and hence is in compliance with 47 CFR 74.1204(h). (see page 6, Exhibit 12(d) & Page 4, Exhibit 12 (b))

Page 5, Exhibit 12(c), is a Table showing the distance to the F (50/50) 60 dbu contour of the Proposed 99.3 Translator, prepared using ComStudy 2.2. *(Also note the HAAT Column of this Exhibit for Reference)

Page 6, Exhibit 12(d), is a Table showing the distance to the Proposed ch. 257 Translator's F(50,10) 34 dBu Interfering Contour.

Page 7, Exhibit 12(e), is a Topographical map of the area around the proposed channel 257 translator site.

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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 8, Exhibit 12(f). (ComStudy uses the FCC's FM Database, thus the results included the proposed translator's currently licensed or applied for facilities. 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 257 Translator can operate with an effective radiated power of 8-watts at 4 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 OPERATION OF CH. 257, FM TRANSLATOR IS EXEMPT FROM ROUTINE EVALUATION WITH RESPECT TO RADIOFREQUENCY RADIATION UNDER SECTION 1.1307(B) OF THE COMMISSION'S RULES, BECAUSE THE EFFECTIVE RADIATED POWER DOES NOT EXCEED 100 WATTS. THE APPLICANT WILL OPERATE THE PROPOSED FM TRANSLATOR AT REDUCED POWER, OR TEMPORARILY CEASE OPERATION, AS MAY BE REQUIRED TO PROTECT ALL WORKERS FROM EXPOSURE TO HAZARDOUS LEVELS OF RADIOFREQUENCY RADIATION.

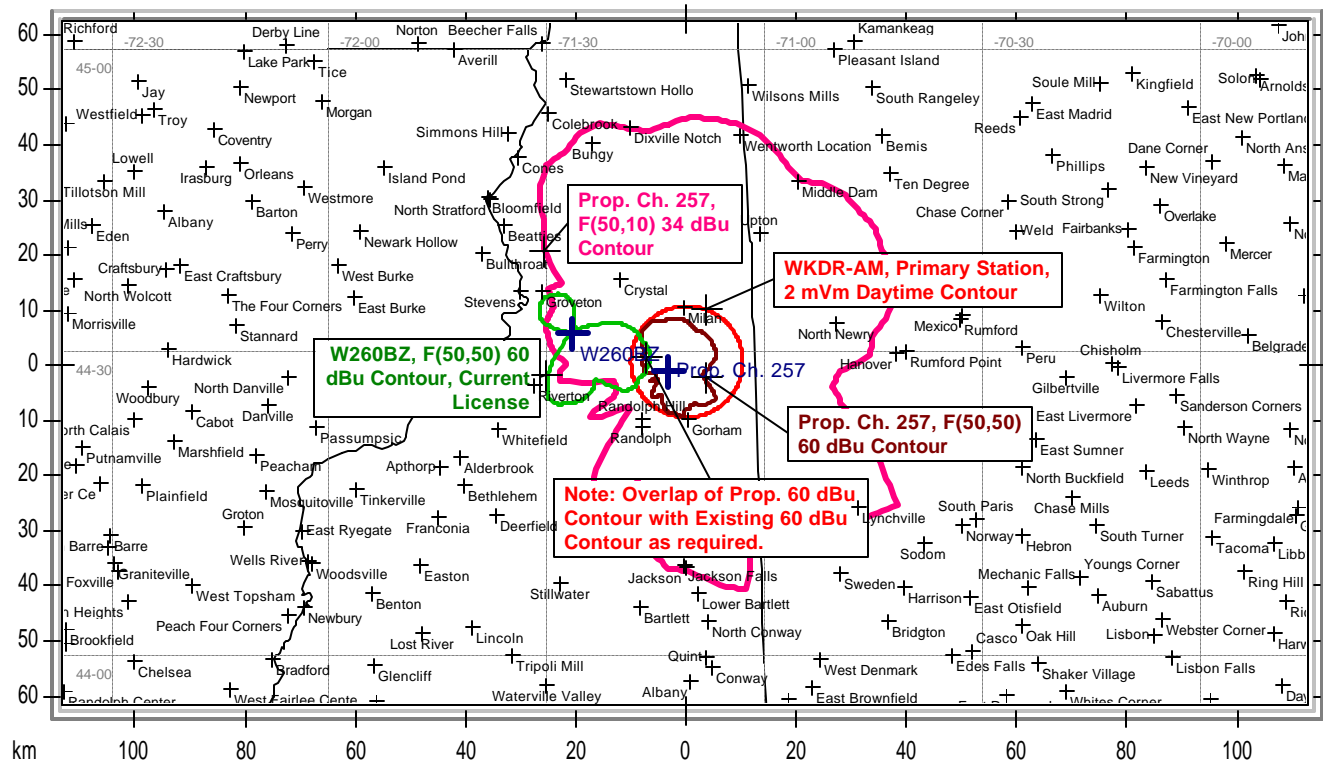
 State Borders
 Lat/Lon Grid

Prop. Ch. 257 Translator

Berlin, New Hampshire

8 Watts ERP @ 4 Meters AGL

Prop. Ch. 257, F(50,50) 60 dbu Contour Overlaps Existing W260BZ License.



Prop. ch. 257 Translator F(50,10) 34 dBu does not cross the US-Canadian Border.

State Borders Lat/Lon Grid

Prop. Ch. 257, Berlin, NH
Distance to 60 dBu Contour

Site: Prop. Ch. 257
Coordinates 44-28-00.0 N, 71-13-16.0 W
Freq: 99.30000 MHz
ERP: 8.0 Watts

<u>Bearing</u>	<u>ERP W</u>	<u>HAAT</u>	<u>DH</u>	<u>Distance</u>	<u>Lat</u>	<u>Lon</u>
0	6.54	336	360	9.54	44.552464	-71.2211
30	7.63	289	240	9.53	44.55237	-71.219
60	7.93	301	740	9.52	44.55225	-71.2169
90	7.8	148	580	9.51	44.552104	-71.2148
120	7.1	366	340	9.5	44.551932	-71.2127
150	5.4	254	700	9.49	44.551734	-71.2107
180	3.43	292	560	9.48	44.551511	-71.2086
210	2.47	176	470	9.48	44.551262	-71.2065
240	2.26	80	270	9.47	44.550987	-71.2045
270	2.34	108	390	9.46	44.550687	-71.2024
300	2.91	140	600	9.45	44.550362	-71.2004
330	4.56	368	650	9.44	44.550003	-71.1984

Prop. Ch. 257, Berlin, NH
Distance to 34 dBu Contour

Site: Prop. Ch. 257
Coordinat 44-28-00.0 N, 71-13-16.0 W
Freq: 99.30000 MHz
ERP: 8.0 Watts

<u>Bearing</u>	<u>ERP W</u>	<u>HAAT</u>	<u>DH</u>	<u>Distance</u>	<u>Lat</u>	<u>Lon</u>
0	6.54	336	360	45.34	44.874447	-71.2211
5	6.8	350	310	45.64	44.877091	-71.211
10	7.02	348	150	45.94	44.879608	-71.2008
15	7.22	346	200	46.24	44.882004	-71.1904
20	7.39	337	150	46.54	44.884258	-71.1799
25	7.51	314	120	46.84	44.886387	-71.1693
30	7.63	289	240	46.88	44.886034	-71.1589
35	7.71	275	160	46.92	44.885561	-71.1485
40	7.79	304	270	46.97	44.884949	-71.1381
45	7.84	315	390	47.01	44.884215	-71.1278
50	7.88	312	410	47.05	44.883352	-71.1174
55	7.9	318	380	47.08	44.882261	-71.1071
60	7.93	301	740	47.11	44.881041	-71.0968
65	7.93	300	550	47.14	44.879692	-71.0865
70	7.93	298	570	47.17	44.878214	-71.0763
75	7.92	258	550	47.2	44.876616	-71.0661
80	7.9	214	630	47.11	44.873862	-71.0563
85	7.85	204	480	47.02	44.870981	-71.0466
90	7.8	148	580	46.93	44.867986	-71.0371
95	7.76	136	600	46.84	44.864875	-71.0276
100	7.66	155	520	46.75	44.861652	-71.0182
105	7.57	187	320	46.44	44.856397	-71.01
110	7.43	240	260	46.12	44.85105	-71.0019
115	7.28	295	270	45.8	44.845632	-70.9941
120	7.1	366	340	45.48	44.840128	-70.9865
125	6.89	334	400	45.16	44.834552	-70.979
130	6.64	314	380	44.84	44.828889	-70.9718
135	6.37	270	560	44.52	44.823161	-70.9648
140	6.07	226	740	44.2	44.817361	-70.958
145	5.74	216	640	43.88	44.81151	-70.9514
150	5.4	254	700	43.55	44.805595	-70.945
155	5.04	238	750	43.37	44.800712	-70.9379
160	4.69	344	780	43.19	44.795757	-70.931
165	4.34	330	670	43.01	44.790731	-70.9242
170	4.02	304	1040	42.83	44.785637	-70.9176
175	3.71	289	600	42.65	44.780471	-70.9111
180	3.43	292	560	43.08	44.779697	-70.9002
185	3.2	256	350	43.51	44.778746	-70.8893
190	2.99	179	700	43.94	44.777618	-70.8783
195	2.82	110	1210	44.38	44.77631	-70.8673
200	2.68	131	1010	44.81	44.774821	-70.8562

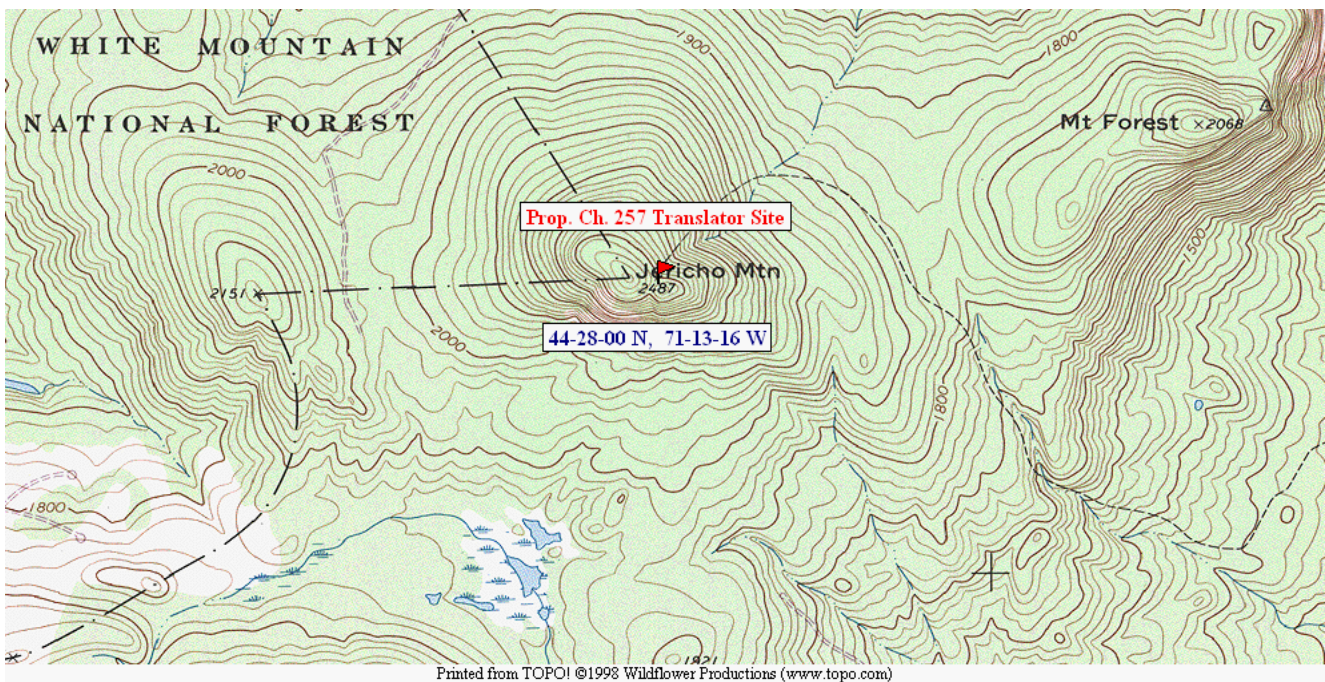
205	2.56	151	810	44.99	44.771432	-70.8472
210	2.47	176	470	45.16	44.767919	-70.8382
215	2.4	152	600	45.34	44.764277	-70.8294
220	2.36	72	610	45.52	44.760505	-70.8205
225	2.31	-18	650	45.7	44.756604	-70.8118
230	2.29	18	300	45.67	44.751262	-70.805
235	2.27	68	300	45.64	44.745835	-70.7984
240	2.26	80	270	45.6	44.740331	-70.792
245	2.26	38	450	45.57	44.734751	-70.7856
250	2.26	23	580	45.54	44.729096	-70.7795
255	2.27	-23	610	45.63	44.724095	-70.7722
260	2.28	12	660	45.73	44.718992	-70.765
265	2.3	110	470	45.83	44.713788	-70.7579
270	2.34	108	390	45.92	44.708485	-70.7509
275	2.38	96	520	46.02	44.703088	-70.7441
280	2.44	120	450	45.77	44.695874	-70.741
285	2.52	132	580	45.52	44.688656	-70.7381
290	2.62	144	490	45.27	44.681435	-70.7354
295	2.75	146	650	45.03	44.674216	-70.7329
300	2.91	140	600	44.78	44.667	-70.7307
305	3.11	164	480	44.77	44.660801	-70.726
310	3.34	145	500	44.75	44.654547	-70.7215
315	3.6	222	330	44.74	44.648239	-70.7172
320	3.9	255	380	44.72	44.641881	-70.713
325	4.21	332	350	44.71	44.635473	-70.7089
330	4.56	368	650	44.68	44.628967	-70.7052
335	4.9	364	430	44.65	44.62242	-70.7017
340	5.26	387	520	44.62	44.615834	-70.6983
345	5.6	382	320	44.6	44.609212	-70.6951
350	5.93	352	430	44.57	44.602554	-70.692
355	6.25	326	380	43.98	44.594263	-70.6958

Proposed Ch. 257 Translator, Site Topo Map

44-28-00.0 N

71-13-16.0 W

Note: This site is outside the White Mountain National Forest, on Jericho Mountain.



Prop. Ch. 257, Berlin, NH
Frequency Separation Study (Table)

44-28-00 N, 71-13-16 W
8 Watts ERP @ 4 Meters AGL

<u>Callsign</u>	<u>State</u>	<u>City</u>	<u>Freq</u>	<u>Channel</u>	<u>ERP w</u>	<u>Class</u>	<u>Status</u>	<u>Distance kr</u>	<u>Sep</u>	<u>Clr</u>
	QU	WINDSOR	99.3	257	0	A		136.8	0	34.84 dB
850712GK	ME	KENNEBUNK	99.3	257	0	A	USE	135.67	0	36.92 dB
871029MI	NH	JACKSON	99.5	258	0	A	USE	30.07	0	10.36 dB
CJAN-FM	QC	ASBESTOS	99.3	257	11100	B1		153.71	0	32.49 dB
NEW	ME	BRUNSWICK	99.5	258	10	D	APP	114.84	0	39.87 dB
NEW	ME	LEWISTON	99.5	258	13	D	APP	96.52	0	35.10 dB
NEW	ME	OLD TOWN	99.3	257	250	D	APP	209.64	0	36.97 dB
NEW	VT	MONTPELIER	99.3	257	250	D	APP	109.92	0	22.02 dB
W257AU	VT	ST. JOHNSBURY, ETC	99.3	257	5	D	LIC	59.97	0	18.77 dB
W257BI	ME	CAMDEN	99.3	257	250	D	LIC	173.85	0	32.36 dB
WBQQ	ME	KENNEBUNK	99.3	257	3000	A	LIC	133.75	0	29.01 dB
WBTZ	NY	PLATTSBURGH	99.9	260	100000	C	LIC	192.86	0	34.79 dB
WCLZ	ME	NORTH YARMOUTH	98.9	255	48000	B	LIC	114.84	0	21.16 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	201.4	0	34.41 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	201.4	0	34.41 dB
WCRB	MA	LOWELL	99.5	258	37000	B	LIC	201.4	0	33.58 dB
WEVJ	NH	JACKSON	99.5	258	4700	A	LIC	32.68	0	4.97 dB
WFRD	NH	HANOVER	99.3	257	6000	A	LIC	124.77	0	35.48 dB
WKTJ-FM	ME	FARMINGTON	99.3	257	0	A	USE	84.07	0	21.65 dB
WKTJ-FM	ME	FARMINGTON	99.3	257	1500	A	LIC	84.07	0	16.92 dB
WNYN-FM	NH	WHITEFIELD	99.1	256	460	A	LIC	43.04	0	5.29 dB
WNYN-FM	NH	WHITEFIELD	99.1	256	0	A	USE	24.35	0	19.90 dB
WOKO	VT	BURLINGTON	98.9	255	100000	C1	LIC	157.31	0	33.99 dB
WHTT	ME	AUBURN	99.9	260	28500	B	LIC	93.47	0	13.70 dB
WTTT	NH	BRETTON WOODS	98.7	254	0	A	RSV	24.74	0	25.06 dB
WTTT	NH	BRETTON WOODS	98.7	254	40	A	APP	22.78	0	0.87 dB
WTTT	NH	STRATFORD	98.7	254	143	A	CP	38.63	0	6.08 dB
WTTT*	NH	STRATFORD	98.7	254	0	A	USE	40.4	0	18.33 dB
WVPA	VT	ST. JOHNSBURY	88.5	203	850	C2	APP	54.73	15	39.7