

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317IKQ

Channel: 234

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 4 of this exhibit.

Page 3 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference protection provisions based on 47 CFR 74.1204(d), which states:

"an 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."

In addition, page 3 includes a tabulation of the second and third adjacent stations which this application is required to protect and the field strengths of those stations in the vicinity of the proposed translator. The field strengths given were based on contours predicted using FCC contour algorithms and 3 arc second terrain data.

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.

Page 4 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application had to consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

Page 5 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 min 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 a free-space calculation (see FCC 98-117, Appendix A, pg. 41 for reference to the equation used).

Since the proposed translator is 256.4 km from the Canadian border, 47 CFR 74.1235(d) has been taken into account and this applicant certifies that in no direction does the 34 dBu F(50,10) extend beyond 60 km, and this application is therefore in full compliance with 47 CFR 74.1235(d)(3), which states that "the distance to the 34 dBu interfering contour may not exceed 60 km in any direction," and hence in compliance with 47 CFR 74.1204(h).

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 "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.

-Entries highlighted in red are those stations where there is overlap of predicted contours and lack of population has been demonstrated within the area of interference.

Compliance with 47 CFR 74.1204(d)

The proposed translator's Maximum Effective Radiated Power (ERP) is 0.01kW at 74 meters above ground level. According to 47 CFR, 74.1204(a), the desired to undesired ratio between 2nd/3rd adjacent stations is 40dB, making the proposed translator's interfering contour 106.3dBu F(50,10).

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), this proposed translator's F(50,10) interference contour was calculated and plotted on the pertinent portion of a USGS quadrangle (page 5 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the calculated area of interference (Note: FCC 02-244, II, A, 6 states that USGS quadrangles are sufficient for demonstrating lack of population). Hence, in accordance with 47 CFR 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 therefore this application is in full compliance with 47 CFR 74.1204.

CORAGL: 74m
Maximum ERP: 0.01kW

Antenna Manufacturer: SWR
Antenna Model: FM1

F(50,10) Interfering Contour: 106.3dBu
F(50,10) Max Distance: 107.4m

The F(50,50) signal strength of all relevant second and third adjacent stations have been examined, and are tabulated below. Column three shows the station's signal level at the proposed translator's tower site, and column four gives the minimum value within the entire proposed translator's standard F(50,10) contour (100 dBu for most classes, 94 dBu for class B's, 97 dBu for class B1's). For signal levels too great to determine, 999 was entered. The minimum F(50,50) contour within the proposed translator's standard F(50,10) contour was used to calculate the proposed translator's interference contour, thereby assuring a minimum undesired-to-desired ratio of 40dB for all relevant adjacent stations, as required in 47 CFR, 74.1204(a).

FCC File Number	Call Sign	F(50,50) Contour at Tower	Min. F(50,50) Contour
BLH19840416CF	WQKX	66.6dBu	66.3dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			66.3dBu

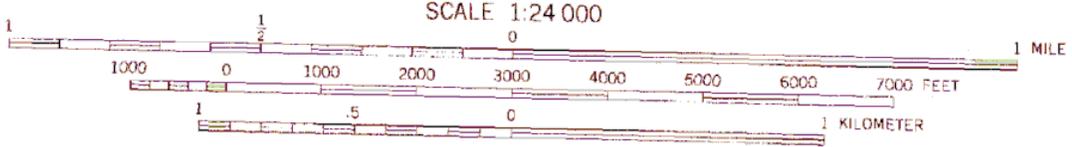
Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
WQKX	PA	SUNBURY	231	16000	SUNBURY BROADCASTING CORPORA	BLH19840416CF	B	LIC	41.49	-12.94 dB	63890
NEW	PA	WILLIAMSPORT	235	250	CLEAR CHANNEL BROADCASTING LIC	BNPFT20030317AQF	D	APP	19.07	3.03 dB	149112
WRBT	PA	HARRISBURG	235	25000	CLEAR CHANNEL BROADCASTING LIC	BMLH20020131AAD	B	LIC	93.11	5.08 dB	54019
WBLJ-FM	PA	SHAMOKIN	237	1250	CLEAR CHANNEL BROADCASTING LIC	BMLH20030328ABU	A	LIC	48.97	10.01 dB	47286
WMTT	PA	TIOGA	234	12000	EUROPA COMMUNICATIONS, INC.	BLH19971219KD	B1	LIC	111.23	13.78 dB	19858
WRBT	PA	HARRISBURG	235	2900	CLEAR CHANNEL BROADCASTING LIC	BXLH20020917AAY	B	LIC	93.15	14.86 dB	54019
NEW	PA	HAZLETON	234	10	KEVIN M. FITZGERALD	BNPFT20030317KYZ	D	APP	74.71	15.27 dB	157407
NEW	PA	SHAMOKIN	233	10	FOUR RIVERS COMMUNITY BROADCA	BNPFT20030317KUF	D	APP	50.7	17.71 dB	157311
NEW	PA	SCRANTON	234	10	KEVIN M. FITZGERALD	BNPFT20030317MQH	D	APP	96.33	19.24 dB	156236
WDAC	PA	LANCASTER	233	19000	WDAC RADIO COMPANY	BLH19880620KA	B	LIC	147.33	20.22 dB	71309
WLTS	PA	STATE COLLEGE	233	1900	FOREVER OF PA, LLC	BLH20020128AAI	A	LIC	90.43	21.70 dB	38271
WMTT	PA	TIOGA	234	0	EUROPA COMMUNICATIONS, INC.		B1	USE	85.33	21.69 dB	19858
NEW	PA	BERWICK	233	10	EDGEWATER BROADCASTING INC.	BNPFT20030317JIV	D	APP	51.62	23.43 dB	146386
WBRX-FM1	PA	ALTOONA	234	54	SHERLOCK BROADCASTING, INC	BLFTB19930527TD	D	LIC	151.39	24.65 dB	33972
WBLJ-FM	PA	SHAMOKIN	237	0	CLEAR CHANNEL BROADCASTING LICENSES, INC.		A	USE	48.97	26.78 dB	47286
WZZO	PA	BETHLEHEM	236	30000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19890830KD	B	LIC	140.95	26.51 dB	14375
W235AA	PA	WILKES-BARRE	235	250	TEMPLE U. OF THE COMMONWEALTH	BPFT20000629AEZ	D	CP	77.1	27.32 dB	65185
WQKX	PA	SUNBURY	231	0	SUNBURY BROADCASTING CORPORATION		B	USE	41.49	27.40 dB	63890
WYYY	NY	SYRACUSE	233	100000	CLEAR CHANNEL BROADCASTING LIC	BMLH19841219KW	B	LIC	207.66	29.98 dB	48725
WYYY	NY	SYRACUSE	233	100000	CLEAR CHANNEL BROADCASTING LIC	BPH20020916AAP	B	CP	207.84	30.01 dB	48725
WZWW	PA	BELLEFONTE	237	790	FIRST MEDIA RADIO, LLC	BLH20020110AAO	A	LIC	92.66	30.22 dB	64572
W235AD	PA	POTTSVILLE	235	120	NORTHEASTERN PENNSYLVANIA ED T	BLFT19971020TK	D	LIC	73.8	30.13 dB	84035
NEW	PA	PUNXSUTAWNEY	234	250	PRIORITY COMMUNICATIONS, INC.	BNPFT20030317MVO	D	APP	173.47	31.38 dB	158508
WTTC-FM	PA	TOWANDA	237	3000	WATS BROADCASTING, INC.	BLH7188	A	LIC	73.82	31.81 dB	68614
WRBT	PA	HARRISBURG	235	0	CLEAR CHANNEL BROADCASTING LICENSES, INC.		B	USE	93.15	32.00 dB	54019
WNED-FM	NY	BUFFALO	233	105000	WESTERN NEW YORK PUBLIC B/C ASS	BMLH19981124KC	B	LIC	231.58	33.86 dB	27669
WTHK	NJ	TRENTON	233	50000	NASSAU BROADCASTING II, L.L.C.	BLH19921116KD	B	LIC	192.5	33.84 dB	25013
WIYN	NY	DEPOSIT	234	770	BANJO COMMUNICATIONS GROUP, INC	BLH19910124KB	A	LIC	148.53	33.45 dB	16441
WTHK	NJ	TRENTON	233	50000	NASSAU BROADCASTING II, L.L.C.	BLH19910307KA	B	LIC	197.56	33.32 dB	25013



ARN: BNPFT-20030317IKQ F(50,10);

2 250 000 FEET 346 50' WASHINGTONVILLE 10 MI. 347 (MILTON) 5666 III SE 6 MI. TO INTERSTATE 80 349 47'30" 350



CONTOUR INTERVAL 20 FEET

'Muncy; PA'; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640" , 1 cm = 240Mt METRIC VERTICAL DATUM OF 1929