

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 139101

Channel 247

### **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 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Pages 4 through 6 include a plot and a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 7 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 8 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.

Page 9 of this exhibit is a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by the U.S. Geological Survey's National Aerial Photography Program. It has been included to provide clarification of the nature of the buildings in the vicinity.

**Note: The USGS Quadrangle and the aerial photo show the presence of buildings within the zone of predicted interference that are approximately 20 to 25 ft in height. The calculated ground clearance is 9m (29.5ft) which is more than adequate to provide the necessary clearance.**

## 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 dB $\mu$  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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1130215	BLH20060727AAL	WINK-FM	94.5	94.1
492179	BLH20000120ABH	WTLQ-FM	64.1	64.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>64.1</b>

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 **64.1 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **104.1 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **218.8 m** from the transmit antenna.

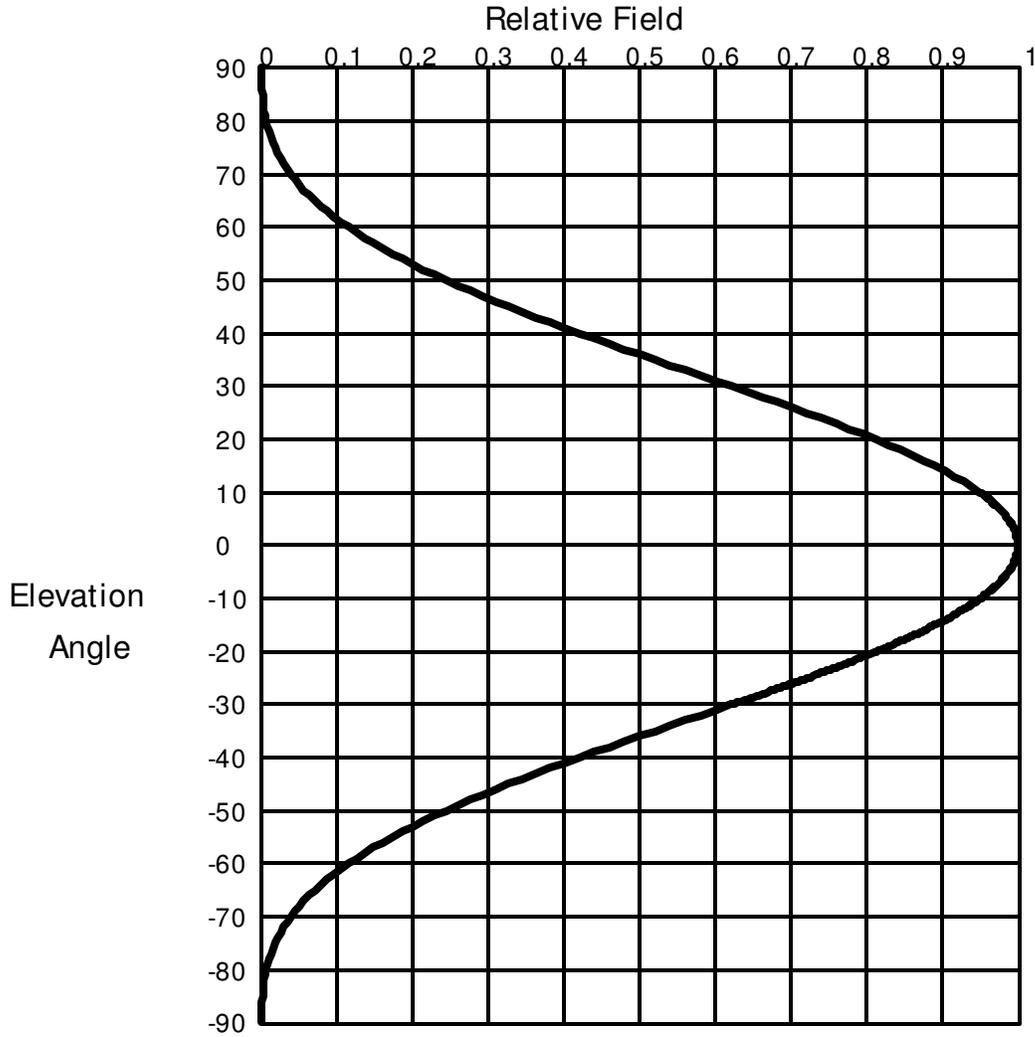
The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated on the following page at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free-space calculation that neglects any loss due to reflection, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the tower ground level (TGL) by **9 m** at the lowest point. The applicant has taken into account USGS quadrangles and relevant aerial photography in stating that no structures, except possibly tower support structures, puncture the area of interference. 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:** SWR  
**Antenna Model:** 2FM1-0.5  
**CORAGL:** 77 m  
**Maximum ERP:** 0.025 kW  
**Interfering Contour:** 104.1 dB $\mu$   
**Max Int. Contour Distance:** 218.8 m  
**Min Ground Clearance:** 9 m

**Note: The USGS Quadrangle and the aerial photo show the presence of buildings within the zone of predicted interference that are approximately 20 to 25 ft in height. The calculated ground clearance is 9m (29.5ft) which is more than adequate to provide the necessary clearance.**



Depression Angle Below Horizontal	Antenna Relative Field	ERP (watts)	Distance to Interfering Contour from Antenna (m)	Horizontal Distance of Interfering Contour from Tower (m)	Vertical Clearance of Interfering Contour above TGL (m)
5	.987	24.4	215.9	215.1	58.2
10	.950	22.6	207.8	204.7	40.9
15	.890	19.8	194.7	188.1	26.6
20	.812	16.5	177.6	166.9	16.2
25	.721	13.0	157.7	142.9	10.3
30	.622	9.7	136.1	117.8	9.0
35	.520	6.8	113.8	93.2	11.8
40	.420	4.4	91.9	70.4	17.9
45	.327	2.7	71.5	50.6	26.4
50	.244	1.5	53.4	34.3	36.1
55	.173	0.7	37.8	21.7	46.0
60	.115	0.3	25.2	12.6	55.2
65	.070	0.1	15.3	6.5	63.1
70	.039	0.0	8.5	2.9	69.0
75	.018	0.0	3.9	1.0	73.2
80	.006	0.0	1.3	0.2	75.7
85	.001	0.0	0.2	0.0	76.8
90	.000	0.0	0.0	0.0	77.0
Minimum Clearance above TGL:					<b>9 m</b>



## Elevation Pattern

Scale: Linear

Units: Field, Relative

### Systems With Reliability Inc.

CLIENT: *General*

Date: 11/10/03

ANTENNA TYPE: FM1/2 HWS

FREQUENCY: 98.1

PATTERN POL.: Circular

DIRECTIVITY(Peak): 1.39/ 1.43 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 1.39/ 1.43 dBd

Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
3.2	.995 (-0.046)	-4.4	.99 (-0.086)	-12.0	.929 (-0.644 )
3.0	.995 (-0.04)	-4.6	.989 (-0.094)	-12.2	.926 (-0.666 )
2.8	.996 (-0.035)	-4.8	.988 (-0.103)	-12.4	.924 (-0.688 )
2.6	.997 (-0.03)	-5.0	.987 (-0.111)	-12.6	.921 (-0.711 )
2.4	.997 (-0.026)	-5.2	.986 (-0.121)	-12.8	.919 (-0.733 )
2.2	.998 (-0.022)	-5.4	.985 (-0.13)	-13.0	.917 (-0.757 )
2.0	.998 (-0.018)	-5.6	.984 (-0.14)	-13.2	.914 (-0.78 )
1.8	.998 (-0.014)	-5.8	.983 (-0.15)	-13.4	.912 (-0.804 )
1.6	.999 (-0.011)	-6.0	.982 (-0.161)	-13.6	.909 (-0.828 )
1.4	.999 (-0.009)	-6.2	.98 (-0.171)	-13.8	.906 (-0.853 )
1.2	.999 (-0.006)	-6.4	.979 (-0.183)	-14.0	.904 (-0.878 )
1.0	.999 (-0.004)	-6.6	.978 (-0.194)	-14.2	.901 (-0.904 )
.8	1.00 (-0.003)	-6.8	.977 (-0.206)	-14.4	.899 (-0.929 )
.6	1.00 (-0.002)	-7.0	.975 (-0.219)	-14.6	.896 (-0.956 )
.4	1.00 (-0.001)	-7.2	.974 (-0.231)	-14.8	.893 (-0.982 )
.2	1.00 (0)	-7.4	.972 (-0.244)	-15.0	.89 (-1.009 )
.0	1.00 (0)	-7.6	.971 (-0.258)	-15.2	.888 (-1.036 )
-.2	1.00 (0)	-7.8	.969 (-0.272)	-15.4	.885 (-1.064 )
-.4	1.00 (-0.001)	-8.0	.968 (-0.286)	-15.6	.882 (-1.092 )
-.6	1.00 (-0.002)	-8.2	.966 (-0.3)	-15.8	.879 (-1.12 )
-.8	1.00 (-0.003)	-8.4	.964 (-0.315)	-16.0	.876 (-1.149 )
-1.0	.999 (-0.004)	-8.6	.963 (-0.33)	-16.2	.873 (-1.178 )
-1.2	.999 (-0.006)	-8.8	.961 (-0.346)	-16.4	.87 (-1.208 )
-1.4	.999 (-0.009)	-9.0	.959 (-0.362)	-16.6	.867 (-1.238 )
-1.6	.999 (-0.011)	-9.2	.957 (-0.378)	-16.8	.864 (-1.268 )
-1.8	.998 (-0.014)	-9.4	.956 (-0.395)	-17.0	.861 (-1.299 )
-2.0	.998 (-0.018)	-9.6	.954 (-0.412)	-17.2	.858 (-1.33 )
-2.2	.998 (-0.022)	-9.8	.952 (-0.429)	-17.4	.855 (-1.361 )
-2.4	.997 (-0.026)	-10.0	.95 (-0.447)	-17.6	.852 (-1.393 )
-2.6	.997 (-0.03)	-10.2	.948 (-0.465)	-17.8	.849 (-1.425 )
-2.8	.996 (-0.035)	-10.4	.946 (-0.483)	-18.0	.846 (-1.457 )
-3.0	.995 (-0.04)	-10.6	.944 (-0.502)	-18.2	.842 (-1.49 )
-3.2	.995 (-0.046)	-10.8	.942 (-0.521)	-18.4	.839 (-1.524 )
-3.4	.994 (-0.052)	-11.0	.94 (-0.541)	-18.6	.836 (-1.557 )
-3.6	.993 (-0.058)	-11.2	.937 (-0.561)	-18.8	.833 (-1.591 )
-3.8	.993 (-0.064)	-11.4	.935 (-0.581)	-19.0	.829 (-1.626 )
-4.0	.992 (-0.071)	-11.6	.933 (-0.602)	-19.2	.826 (-1.661 )
-4.2	.991 (-0.079)	-11.8	.931 (-0.623)	-19.4	.823 (-1.696 )

**Systems With Reliability Inc.**

CLIENT: *General*  
 ANTENNA TYPE: FM1/ 2 HWS  
 FREQUENCY: 98.1  
 PATTERN POL.: Circular  
 DIRECTIVITY(Peak): 1.39/ 1.43 dBd  
 DIRECTIVITY(Horiz): 1.39/ 1.43 dBd

Date: 11/10/03

Beam Tilt (Deg.) : 0  
 Null Fill(s)(%) : 0, 0, 0

# Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
-19.6	.819 (-1.731)	-27.2	.678 (-3.373)	-54.0	.186 (-14.615)
-19.8	.816 (-1.767)	-27.4	.674 (-3.424)	-55.0	.173 (-15.254)
-20.0	.812 (-1.804)	-27.6	.67 (-3.476)	-56.0	.16 (-15.914)
-20.2	.809 (-1.84)	-27.8	.666 (-3.528)	-57.0	.148 (-16.597)
-20.4	.806 (-1.877)	-28.0	.662 (-3.58)	-58.0	.136 (-17.304)
-20.6	.802 (-1.915)	-28.2	.658 (-3.633)	-59.0	.125 (-18.036)
-20.8	.799 (-1.953)	-28.4	.654 (-3.686)	-60.0	.115 (-18.794)
-21.0	.795 (-1.991)	-28.6	.65 (-3.739)	-61.0	.105 (-19.581)
-21.2	.792 (-2.03)	-28.8	.646 (-3.793)	-62.0	.096 (-20.397)
-21.4	.788 (-2.069)	-29.0	.642 (-3.848)	-63.0	.087 (-21.245)
-21.6	.784 (-2.108)	-29.2	.638 (-3.903)	-64.0	.078 (-22.126)
-21.8	.781 (-2.148)	-29.4	.634 (-3.958)	-65.0	.07 (-23.044)
-22.0	.777 (-2.188)	-29.6	.63 (-4.014)	-66.0	.063 (-24)
-22.2	.774 (-2.229)	-29.8	.626 (-4.07)	-67.0	.056 (-24.997)
-22.4	.77 (-2.27)	-30.0	.622 (-4.126)	-68.0	.05 (-26.039)
-22.6	.766 (-2.311)	-31.0	.601 (-4.416)	-69.0	.044 (-27.13)
-22.8	.763 (-2.353)	-32.0	.581 (-4.716)	-70.0	.039 (-28.274)
-23.0	.759 (-2.395)	-33.0	.561 (-5.027)	-71.0	.034 (-29.475)
-23.2	.755 (-2.438)	-34.0	.54 (-5.349)	-72.0	.029 (-30.74)
-23.4	.752 (-2.481)	-35.0	.52 (-5.683)	-73.0	.025 (-32.074)
-23.6	.748 (-2.524)	-36.0	.50 (-6.029)	-74.0	.021 (-33.487)
-23.8	.744 (-2.568)	-37.0	.479 (-6.387)	-75.0	.018 (-34.986)
-24.0	.74 (-2.612)	-38.0	.459 (-6.756)	-76.0	.015 (-36.583)
-24.2	.737 (-2.657)	-39.0	.44 (-7.138)	-77.0	.012 (-38.292)
-24.4	.733 (-2.701)	-40.0	.42 (-7.533)	-78.0	.01 (-40.128)
-24.6	.729 (-2.747)	-41.0	.401 (-7.941)	-79.0	.008 (-42.113)
-24.8	.725 (-2.793)	-42.0	.382 (-8.362)	-80.0	.006 (-44.272)
-25.0	.721 (-2.839)	-43.0	.363 (-8.797)	-81.0	.005 (-46.639)
-25.2	.717 (-2.885)	-44.0	.345 (-9.246)	-82.0	.003 (-49.26)
-25.4	.713 (-2.932)	-45.0	.327 (-9.71)	-83.0	.002 (-52.199)
-25.6	.71 (-2.98)	-46.0	.309 (-10.188)	-84.0	.002 (-55.546)
-25.8	.706 (-3.027)	-47.0	.292 (-10.682)	-85.0	.001 (-59.44)
-26.0	.702 (-3.076)	-48.0	.276 (-11.191)	-86.0	.001 (-64.112)
-26.2	.698 (-3.124)	-49.0	.259 (-11.717)	-87.0	.00 (-69.988)
-26.4	.694 (-3.173)	-50.0	.244 (-12.26)	-88.0	.00 (-78.01)
-26.6	.69 (-3.223)	-51.0	.229 (-12.821)	-89.0	.00 (-91.156)
-26.8	.686 (-3.272)	-52.0	.214 (-13.4)	-90.0	.00 (-50)
-27.0	.682 (-3.323)	-53.0	.20 (-13.998)	90.0	.00 (-50)

**Systems With Reliability Inc.**

Page 2 of 2

CLIENT: *General*

Date: 11/10/03

ANTENNA TYPE: FM1/2 HWS

FREQUENCY: 98.1

PATTERN POL.: Circular

DIRECTIVITY(Peak): 1.39/ 1.43 dBd

Beam Tilt (Deg.) : 0

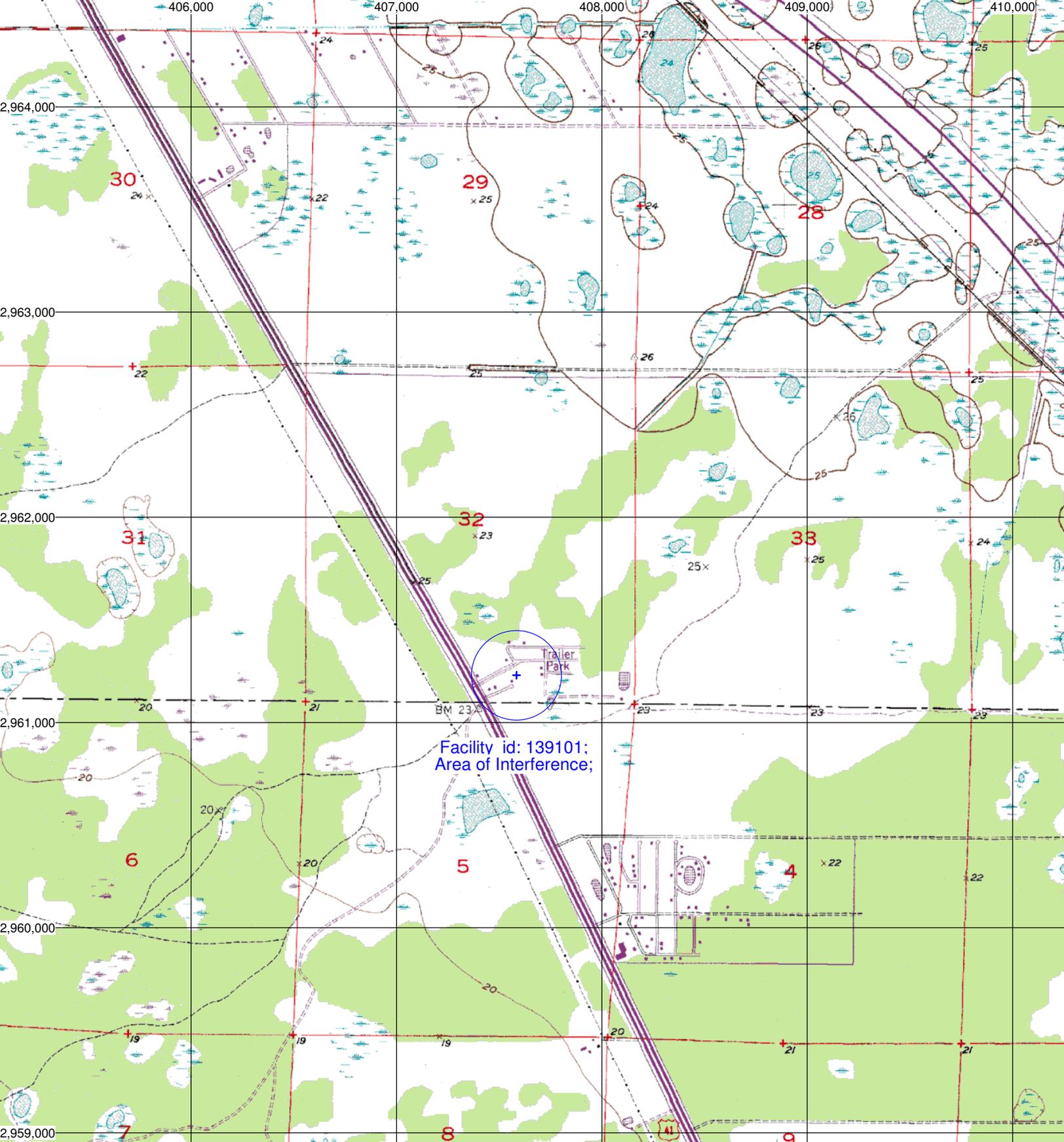
DIRECTIVITY(Horiz): 1.39/ 1.43 dBd

Null Fill(s)(%) : 0, 0, 0

**Adjacent Channel Study**  
**For Station W247AQ, Facility\_id: 139101**

**Co-channel through third adjacent:**

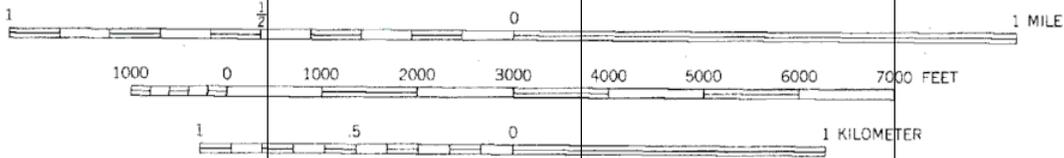
Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1130215	22094	BLH	20060727AAL	WINK-FM	FORT MYERS BROADCASTING COMPANY	C	FORT MYERS	FL	LIC	98	465	245	2	16.8	0.1492
492179	28901	BLH	20000120ABH	WTLQ-FM	INTERMART BROADCASTING GULF COAST, INC.	C3	PUNTA RASSA	FL	LIC	14.5	131	249	2	31.5	0.1492
1111073	84009	BPFT	20060203ACS	W247AF	BIBLE BROADCASTING NETWORK, INC.	D	SARASOTA	FL	CP	0.197	35	247	0	81.3	0
632648	141122	BNPFT	20030310BCD	NEW	BROADCAST TOWERS, INC.	D	NAPLES	FL	APP	0.12	47	247	0	81.4	0
493832	84009	BLFT	20000218ABF	W247AF	BIBLE BROADCASTING NETWORK, INC.	D	SARASOTA	FL	LIC	0.08	55	247	0	82.5	0
649826	156535	BNPFT	20030317HTM	NEW	AMERICAN EDUCATIONAL BROADCASTING, INC.	D	NAPLES	FL	APP	0.013	124	247	0	83	0
1024170	25872	BPH	20011113ACT	WPCV	HALL COMMUNICATIONS, INC.	C	WINTER HAVEN	FL	CP	100	478	248	1	144.3	0



Facility id: 139101;  
Area of Interference;

5 R. 24 E. 406 (FORT MYERS NW) 4637 III NW 5.5 MI. TO FLA. 78 FT. MYERS 9.3 MI. 55' 409 410

SCALE 1:24000



CONTOUR INTERVAL 5 FEET

NATIONAL GEODETIC VERTICAL DATUM OF 1929

Gilchrist; FL; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640" , 1 cm = 240Mt



-81,9294



26,7712

26,7712