

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317KPK

Channel: 275

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 overlayed. 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 295.6 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 8 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 0.008kW at 31 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 116.7dBu 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: 31m

Antenna Manufacturer: SWR

Maximum ERP: 0.008kW

Antenna Model: FM1

F(50,10) Interfering Contour: 116.7dBu

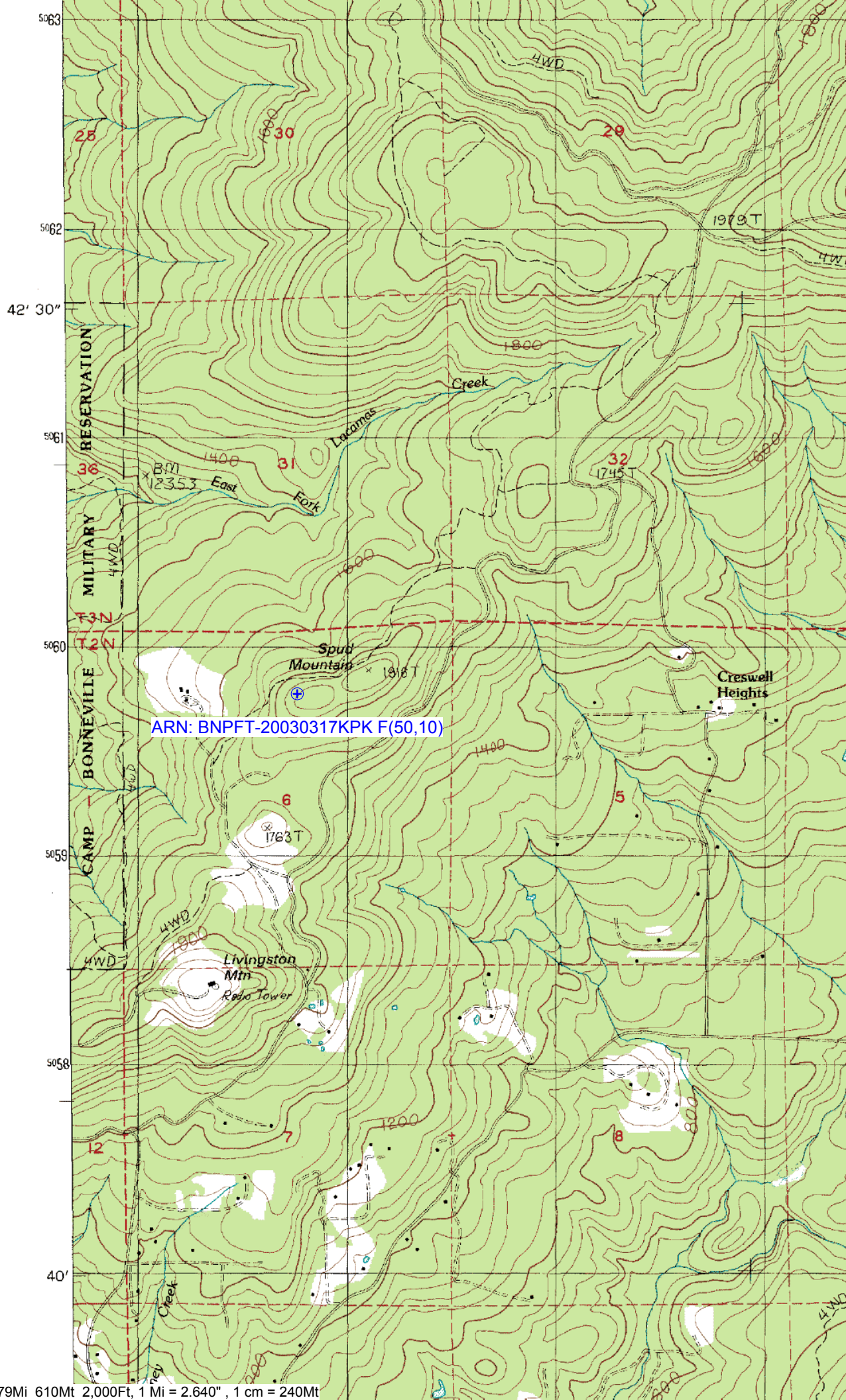
F(50,10) Max Distance: 29.0m

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
BXPH20011214AAG	KKCW	77dBu	76.7dBu
BMXPH20020613AAC	KKCW	76.9dBu	76.7dBu
BLH20011214AAF	KKCW	82.4dBu	82.2dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			76.7dBu

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
KKCW	OR	BEAVERTON	277	95000	CITICASTERS LICENSES, L.P.	BLH20011214AAF	C	LIC	35.43	-22.77 dB	68210
KKCW	OR	BEAVERTON	277	40000	CITICASTERS LICENSES, L.P.	BMXPH20020613AAC	C	CP	35.45	-17.31 dB	68210
KKCW	OR	BEAVERTON	277	40000	CITICASTERS LICENSES, L.P.	BXPH20011214AAG	C	CP	35.43	-17.32 dB	68210
KMNT	WA	CENTRALIA	275	100000	CITICASTERS LICENSES, L.P.	BLH19850529KQ	C	LIC	110.04	0.76 dB	33829
K274AR	OR	GRESHAM	274	10	EDUCATIONAL MEDIA FOUNDATION	BPFT20030102AAS	D	CP	35.43	2.80 dB	60147
K274AR	OR	GRESHAM	274	28	EDUCATIONAL MEDIA FOUNDATION	BLFT20020221ABQ	D	LIC	34.43	3.07 dB	60147
KGON	OR	PORTLAND	222	0	ENTERCOM PORTLAND LICENSE, LLC (DE)		C	USE	34.49	5.5	2432
KGON	OR	PORTLAND	222	97000	ENTERCOM PORTLAND LICENSE, LLC	BLH19900820KF	C	LIC	34.43	5.4	2432
NEW	OR	OAK GROVE	275	250	M.S.W. COMMUNICATIONS, L.L.C.	BNPFT20030317BRS	D	APP	64.25	5.00 dB	148080
KMNT	WA	CENTRALIA	275	87000	CITICASTERS LICENSES, L.P.	BPH20030306AAK	C	APP	154.72	9.30 dB	33829
KKCW	OR	BEAVERTON	277	0	CITICASTERS LICENSES, L.P.		C	USE	35.92	12.78 dB	68210
KPIK-LP	OR	STAYTON	275	100	SANTIAM COMMUNITY RADIO CORPO	BLL20021231AAA	LP100	LIC	116.84	20.37 dB	133093
KMNT	WA	CENTRALIA	275	88	CITICASTERS LICENSES, L.P.	BLH19980806KE	C	LIC	110.04	21.05 dB	33829
K273AJ	OR	ELWOOD	273	10	CALVARY CHAPEL OF TWIN FALLS, INC	BPFT20030113ABG	D	CP	62.54	23.60 dB	91973
K273AJ	OR	ELWOOD	272	10	CALVARY CHAPEL OF TWIN FALLS, INC	BLFT20020808AAQ	D	LIC	62.54	23.60 dB	91973
K274AU	OR	THE DALLES	274	10	HAYSTACK BROADCASTING, INC.	BPFT20020813AAU	D	CP	97.14	25.44 dB	81601
NEW	OR	FOUR CORNERS	274	250	CITICASTERS LICENSES, L.P.	BNPFT20030317ARA	D	APP	110.65	25.18 dB	139636
KMNT	WA	CENTRALIA	275	0	CITICASTERS LICENSES, L.P.		C	USE	110.04	26.26 dB	33829
KSJJ	OR	REDMOND	275	100000	GCC BEND, LLC	BLH19941108KA	C1	LIC	194.2	27.42 dB	63433
K273AI	WA	ARIEL	273	6	CALVARY CHAPEL OF TWIN FALLS, INC	BLFT20020624AAE	D	LIC	48.5	28.20 dB	93257
K274AU	OR	THE DALLES	276	250	HAYSTACK BROADCASTING, INC.	BLFT19980209TI	D	LIC	93.69	29.96 dB	81601
KYYT	WA	GOLDENDALE	272	2100	HAYSTACK BROADCASTING, INC.	BLH19990318KD	C2	LIC	113.16	30.35 dB	12242
KYTE	OR	NEWPORT	274	65000	YAQUINA BAY COMMUNICATIONS, INC	BLH19921028KA	C1	LIC	168.51	30.39 dB	9848
KZOK-FM	WA	SEATTLE	273	68000	INFINITY RADIO SUBSIDIARY OPERATI	BLH19991221AAZ	C	LIC	203.78	32.26 dB	20357
KEHK	OR	BROWNSVILLE	272	100000	CUMULUS LICENSING CORP.	BLH19940919KA	C1	LIC	196.96	34.28 dB	7989
KCRX-FM	OR	SEASIDE	272	25000	NEW NORTHWEST BROADCASTERS, L	BLH19980909KF	C3	LIC	125.88	34.63 dB	33946
KYYT	WA	GOLDENDALE	272	720	HAYSTACK BROADCASTING, INC.	BXMLH20030529ARF	C2	APP	113.16	35.00 dB	12242
KZOK-FM	WA	SEATTLE	273	50000	INFINITY RADIO SUBSIDIARY OPERATI	BXPH20010307AAB	C	CP	206.72	39.03 dB	20357
K275AA	OR	SPRINGFIELD	275	35	CUMULUS LICENSING CORP.	BLFT19940620TA	D	LIC	191.2	39.36 dB	30652



ARN: BNPFT-20030317KPK F(50,10)