

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317MKJ

Channel: 254

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 5 of this exhibit.

Pages 3 and 4 of this exhibit contain 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 4 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 5 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 6 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 137.2 km from the Mexican border, 47 CFR 74.1235(d) has been taken into account and this applicant certifies that in the direction of the Mexican border, the proposed translator's 60 dBu F(50,50) contour does not lie within 116.3 km of the Mexican border. This application is therefore in full compliance with 47 CFR 74.1235(d)(2), which states that for translators between 125 and 320 km from the border, "in no event shall the location of the 60 dBu contour lie within 116.3 km of the Mexican border," and hence complies 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 62 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 0.062kW at 171 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 109.4dBu F(50,10). (See the next page for more discussion on the determination of the signal strength of the proposed translator's area of interference.)

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), the proposed translator's F(50,10) interference contour was calculated and the maximum horizontal plane was plotted on the pertinent portion of a USGS quadrangle (page 6 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 below 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 (equation referenced in FCC 98-117, Appendix A, pg. 41), the vertical ground clearance of the proposed application's F(50,10) interference contour at each angle has been tabulated. As shown below, the area of interference clears the ground by 103.6 meters 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 proposed area of interference. 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), there is a lack of population within the proposed area of interference and therefore this application is in full compliance with 47 CFR 74.1204.

Antenna Manufacturer:	SCA	Maximum ERP:	62 watts
Antenna Model Number:	CA5-FM/CP/RM	CORAGL:	171 m
Antenna Rotation:	60	F(50,10) Contour:	109.4 dBu

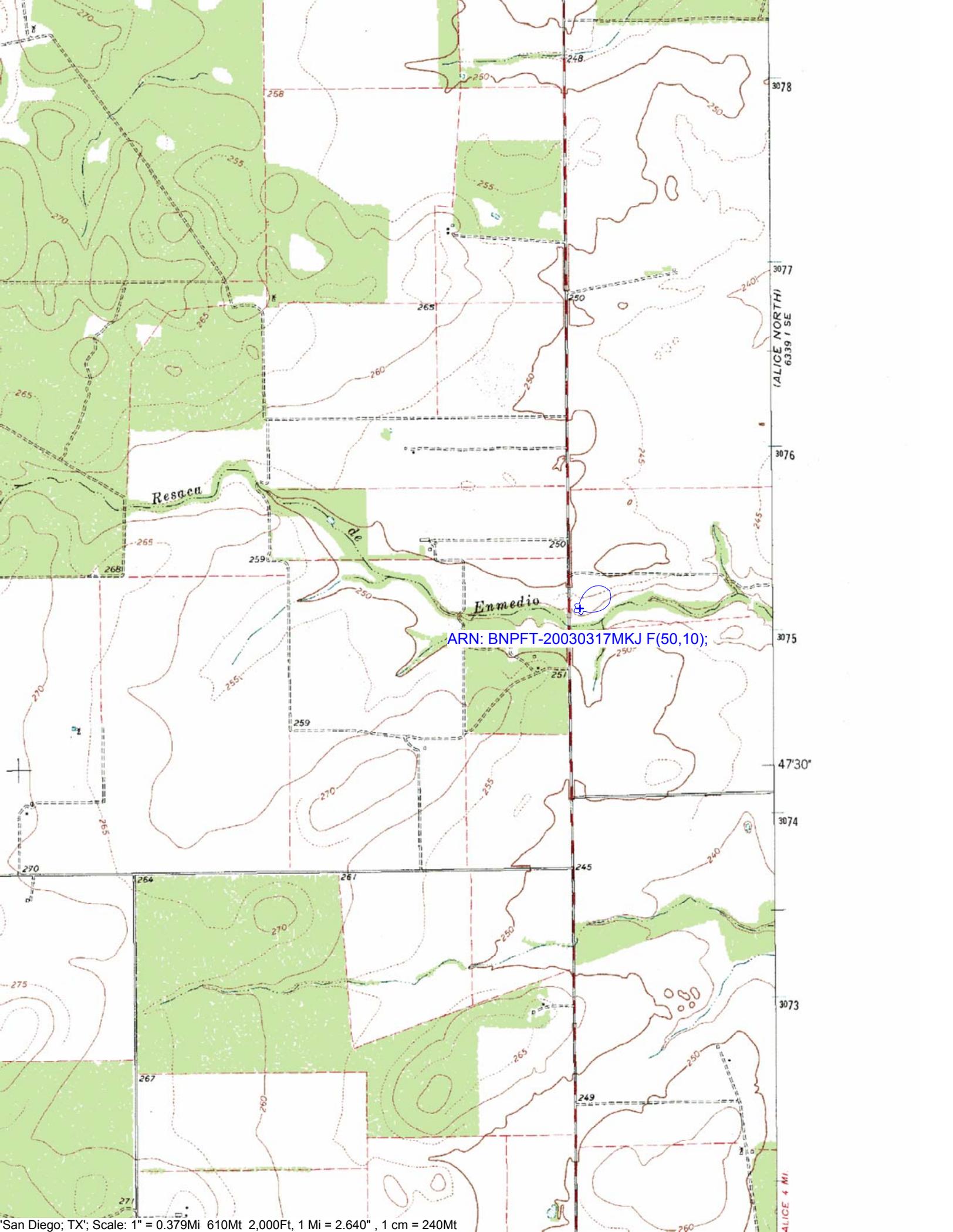
Depression Angle (from COR)	Antenna Relative Field	ERP (watts)	Distance to F(50,10) Interfering Contour from Antenna (m)	Horizontal Distance of F(50,10) Interfering Contour from Tower (m)	Vert. Clearance of F(50,10) Interfering Contour above TGL (m)
5	0.982	59.79	183.8	183.1	155.0
10	0.952	56.19	178.2	175.5	140.1
15	0.915	51.91	171.2	165.4	126.7
20	0.866	46.50	162.1	152.3	115.6
25	0.796	39.28	149.0	135.0	108.0
30	0.718	31.96	134.4	116.4	103.8
35	0.628	24.45	117.5	96.3	103.6
40	0.528	17.28	98.8	75.7	107.5
45	0.423	11.09	79.2	56.0	115.0
50	0.329	6.71	61.6	39.6	123.8
55	0.247	3.78	46.2	26.5	133.1
60	0.19	2.24	35.6	17.8	140.2
65	0.142	1.25	26.6	11.2	146.9
70	0.134	1.11	25.1	8.6	147.4
75	0.135	1.13	25.3	6.5	146.6
80	0.142	1.25	26.6	4.6	144.8
85	0.15	1.40	28.1	2.4	143.0
90	0.157	1.53	29.4	0.0	141.6

Minimum F(50,10) Clearance above TGL **103.6 m**

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
BLH20020220AAD	KRYS-FM	69.8dBu	69.4dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			69.4dBu

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Facility_id	Class	Status	Distance_km	Clr
KRYS-FM	TX	CORPUS CHRISTI	256	100000	CAPSTAR TX LIMITED PARTNERSHIP	BLH20020220AAD	55162	C1	LIC	49.32	-10.17 dB
980707ME	TX	ALICE	201	1500	FAMILY STATIONS, INC	BPED19980707ME	91097	A	APP	0	-10
KLHB	TX	ODEM	252	50000	AMIGO RADIO, LTD.	BLH19970306KF	12170	C2	LIC	67.51	8.26 dB
KLHB	TX	ODEM	252	50000	AMIGO RADIO, LTD.	BLH19970306KF	12170	C2	LIC	67.51	8.26 dB
KTXN-FM	TX	VICTORIA	254	100000	COSMOPOLITAN ENTERPRISES OF VICTORIA	BLH19850402KR	13984	C1	LIC	153.91	22.84 dB
NEW	TX	RIO BRAVO	254	205	RADIO ASSIST MINISTRY, INC.	BNPFT20030317LCG	154977	D	APP	139.68	24.98 dB
KLMO-FM	TX	DILLEY	255	62000	DILLEY BROADCASTERS	BLH20001220AAR	16931	C1	LIC	138.58	25.40 dB
KRRG	TX	LAREDO	251	96000	GUERRA ENTERPRISES	BLH19821108BB	19544	C1	LIC	140.24	26.64 dB
KLMO-FM	TX	DILLEY	255	92000	DILLEY BROADCASTERS	BPH20010102AAO	16931	C1	CP	169.22	30.54 dB
	TX	HEBBRONVILLE	254	0		RM10244	0	A	APP	81.61	30.53 dB
XHNKFM	TA	NUEVO LAREDO	257	50000			95454	B		140.36	31.17 dB
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KTXN-FM	TX	VICTORIA	254	0	COSMOPOLITAN ENTERPRISES OF VICTORIA		13984	C1	USE	153.91	32.26 dB
KGBT-FM	TX	MCCALLEN	253	100000	TICHENOR LICENSE CORPORATION ("TLC")	BLH19950330KB	6662	C	LIC	188.61	32.41 dB
KBBT	TX	SCHERTZ	253	97000	HBC LICENSE CORPORATION	BLH20010122AIJ	3075	C1	LIC	199.55	33.11 dB
KRYS-FM	TX	CORPUS CHRISTI	256	0	CAPSTAR TX LIMITED PARTNERSHIP		55162	C1	USE	49.29	37.74 dB



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