

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317CXD

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 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).

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:

- 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 0.25kW at 85 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 114.7dBu 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 11.5 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: 250 watts

Antenna Model Number: CA5-FM/CP/RM

CORAGL: 85 m

Antenna Rotation: 245

F(50,10) Contour: 114.7 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	241.08	200.5	199.7	67.5
10	0.952	226.58	194.4	191.4	51.2
15	0.915	209.31	186.8	180.4	36.7
20	0.866	187.49	176.8	166.1	24.5
25	0.796	158.40	162.5	147.3	16.3
30	0.718	128.88	146.6	126.9	11.7
35	0.628	98.60	128.2	105.0	11.5
40	0.528	69.70	107.8	82.6	15.7
45	0.423	44.73	86.4	61.1	23.9
50	0.329	27.06	67.2	43.2	33.5
55	0.247	15.25	50.4	28.9	43.7
60	0.19	9.03	38.8	19.4	51.4
65	0.142	5.04	29.0	12.3	58.7
70	0.134	4.49	27.4	9.4	59.3
75	0.135	4.56	27.6	7.1	58.4
80	0.142	5.04	29.0	5.0	56.4
85	0.15	5.63	30.6	2.7	54.5
90	0.157	6.16	32.1	0.0	52.9

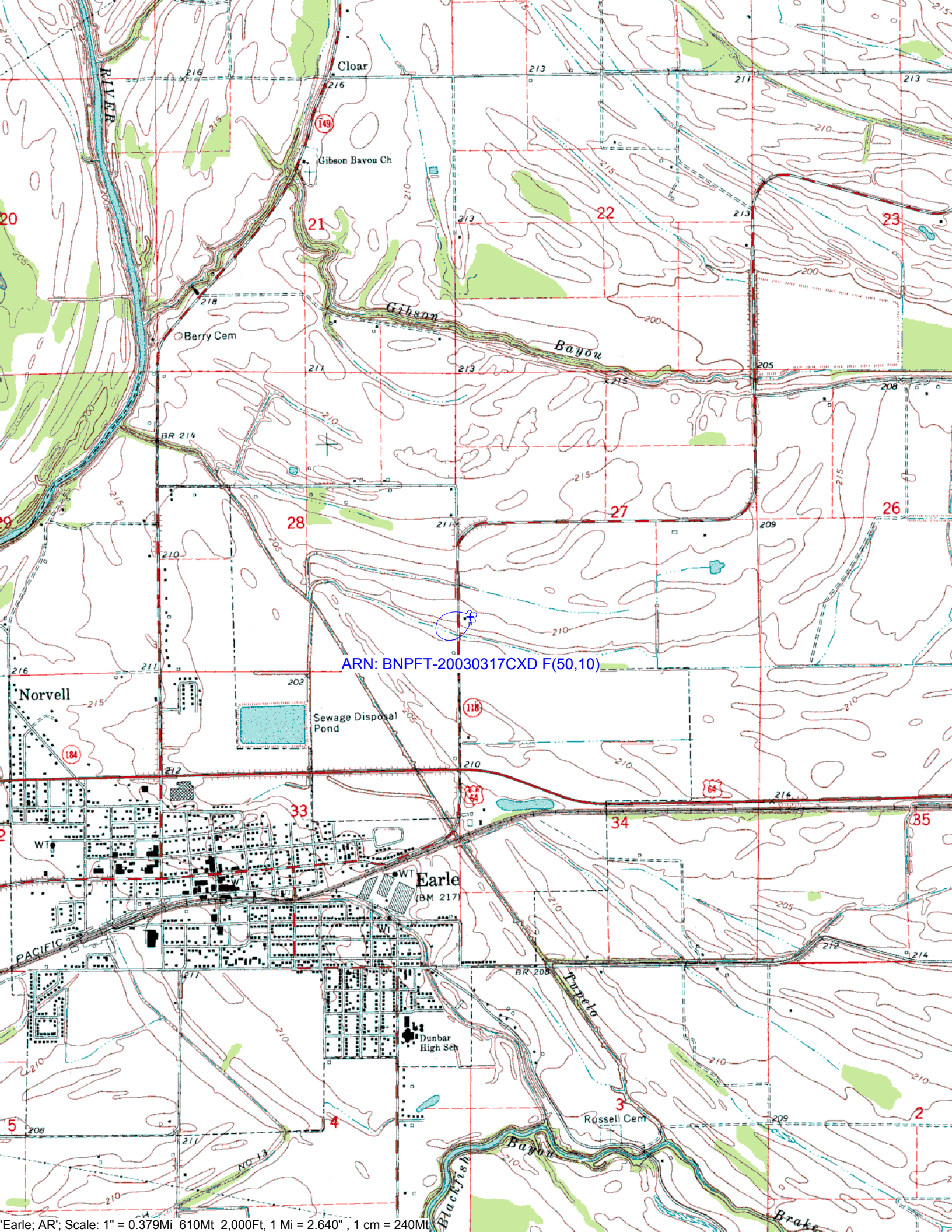
Minimum F(50,10) Clearance above TGL **11.5 m**

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
BMLED20001128ABC	KKLV	76.3dBu	74.7dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Application's Standard F(50,10) Contour:			74.7dBu

Frequency Finder Results

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
KKLV	AR	TURRELL	234	6000	EDUCATIONAL MEDIA FOUNDATION	BMLED20001128ABC	A	LIC	11.44	-16.98 dB	52903
NEW	AR	WYNNE	237	250	EAST ARKANSAS BROADCASTERS, INC.	BNPFT20030313BBT	D	APP	31.64	1.55 dB	138337
NEW	AR	WYNNE	237	170	EDGEWATER BROADCASTING INC.	BNPFT20030317CBB	D	APP	35.66	4.61 dB	147417
NEW	TN	MEMPHIS	236	100	IGLESIA DE CRISTO ELIM DE MEMPHIS	BNPL20010611ADD	LP100	APP	32.23	8.65 dB	134030
WHAL-FM	MS	HORN LAKE	239	6000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BPH20030130ADS	A	APP	46.54	9.70 dB	58399
WHAL-FM	MS	HORN LAKE	239	6000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BPH20020927AAY	A	APP	46.54	9.70 dB	58399
NEW	TN	MILLINGTON	236	100	MINISTERIO APOSTOLICO PARA LAS NACIONES IN MILLINGTON	BNPL20010611AAL	LP100	APP	49.87	14.16 dB	133596
WHAL-FM	MS	OLIVE BRANCH	239	6000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19950717KE	A	LIC	58.76	15.72 dB	58399
NEW	AR	OSCEOLA	237	250	EDGEWATER BROADCASTING INC.	BNPFT20030317CAP	D	APP	52.01	17.94 dB	147407
WVIM-FM	MS	COLDWATER	237	3600	DESOTO COUNTY B/CING. CO.	BPH19950109IC	A	CP	71.19	18.37 dB	16790
WVIM-FM	MS	COLDWATER	237	3000	DESOTO COUNTY B/CING. CO.	BLH7833	A	LIC	70.92	21.82 dB	16790
KKLV	AR	TURRELL	234	0	EDUCATIONAL MEDIA FOUNDATION		A	USE	20.67	21.69 dB	52903
KJIW-FM	AR	HELENA	233	14000	ELIJAH MONDY,JR.	BLH19991201ABK	C3	LIC	85.21	21.08 dB	19237
K234AB	AR	FORREST CITY	234	80	LITTLE ROCK SCHOOL DIST., UNV OF ARK	BLFT19930217TD	D	LIC	41.57	23.00 dB	37791
WKVF	MS	BYHALIA	235	4100	EDUCATIONAL MEDIA FOUNDATION	BLED20021030AAV	A	LIC	80.46	23.16 dB	859
KMSX	AR	MAUMELLE	235	96000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19920326KC	C	LIC	186.63	25.13 dB	61366
KAMS	AR	MAMMOTH SPRING	236	100000	OZARK RADIO NETWORK, INC.	BLH19881108KC	C1	LIC	165.79	28.32 dB	51107
KKLR-FM	MO	POPLAR BLUFF	233	100000	ZIMMER RADIO OF MID-MISSOURI, INC	BLH19890907KC	C1	LIC	164.19	29.95 dB	6016
WGKX	TN	MEMPHIS	290	100000	KIX BROADCASTING, INC.	BLH19891221KC	C	LIC	58.9	29.9	35009
WGKX	TN	MEMPHIS	290	0	KIX BROADCASTING, INC.		C	USE	58.9	29.9	35009
KSSN	AR	LITTLE ROCK	239	92000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19831117BH	C	LIC	193.85	30.97 dB	61363
NEW	AR	SEARCY	237	62	EDGEWATER BROADCASTING INC.	BNPFT20030317CAT	D	APP	111.56	33.20 dB	147409
WKVZ	TN	RIPLEY	235	6000	EDUCATIONAL MEDIA FOUNDATION	BLED20021002ABJ	A	LIC	106.26	34.84 dB	64493
KJEZ	MO	POPLAR BLUFF	238	100000	ZIMMER RADIO OF MID-MISSOURI, INC.	BLH7528	C1	LIC	173.89	34.26 dB	365
	AR	JUDSONIA	237	0		RM9483	A	APP	107.28	35.11 dB	0
NEW	AR	STUTTGART	237	92	EDGEWATER BROADCASTING INC.	BNPFT20030317CAV	D	APP	131.79	36.17 dB	147413
WTBG	TN	BROWNSVILLE	237	5000	THE WIRELESS GROUP, INC.	BMLH19900723KB	A	LIC	115.25	37.78 dB	66659
	MS	HORN LAKE	239	0		RM10351	A	RSV	48.24	37.74 dB	0
WVIM-FM	MS	COLDWATER	237	0	DESOTO COUNTY B/CING. CO.		A	USE	70.92	38.67 dB	16790



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