

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 157240

Channel 272

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 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 dB μ 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.

Pages 4 and 5 of this exhibit are portions of a USGS 1:24,000 scale 7.5 minute quadrangles at full scale with the calculated area of interference overlaid. The sheets include 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 6 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 quadrangle and aerial photo indicate the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision. The zone of predicted interference extends 89m from the proposed transmit site. The nearest buildings are over 650m away to the southwest, so 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.

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 dBμ 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1241042	BPH20080402AAI	KWID	81	80.6
1252678	BPH20080627AAM	KCYE	81	80.6
572807	BLH20010709ABU	KCYE	78.9	78.9
595884	BMLH20020307AAA	KWID	79.5	79.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				78.9

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 **78.9 dBμ**, this makes the proposed translator's worst-case interfering contour **118.9 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **89 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of the USGS quadrangles (page 4 and 5 of this exhibit). As demonstrated on the quadrangles, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population").

Note: The quadrangle and aerial photo indicate the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision. The zone of predicted interference extends 89m from the proposed transmit site. The nearest buildings are over 650m away to the southwest, so 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: SCA
Antenna Model: FMV
CORAGL: 11 m
Maximum ERP: 0.125 kW
Interfering Contour: 118.9 dBμ
Max Int. Contour Distance: 89 m

Adjacent Channel Study
For Station K272EE, Facility_id: 157240

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1332055	57281	BXLH	20090903ACI	KCYE	KJUL LICENSE, LLC	C	BOULDER CITY	NV	LIC	12.5	1014	274	2	42.4	0.7459
1241042	55503	BPH	20080402AAI	KWID	CITICASTERS LICENSES, L.P.	C	LAS VEGAS	NV	CP	100	1143	270	2	42.6	0.7459
1252678	57281	BPH	20080627AAM	KCYE	KJUL LICENSE, LLC	C	BOULDER CITY	NV	CP	100	1143	274	2	42.6	0.7459
595884	55503	BMLH	20020307AAA	KWID	CBS RADIO HOLDINGS INC.	C	LAS VEGAS	NV	LIC	100	1067	270	2	42.6	0.7459
572807	57281	BLH	20010709ABU	KCYE	KJUL LICENSE, LLC	C	BOULDER CITY	NV	LIC	96	1390	274	2	50.2	0.7459
1056745	57281	BXLH	20050407KDQ	KCYE	KJUL LICENSE, LLC	C	BOULDER CITY	NV	LIC	1.5	1344	274	2	50.2	0.5411
279820	86840	BLFT	19990112TI	K274AO	SEXTANT BROADCASTING CO.	D	LAS VEGAS	NV	LIC	0.25	757	274	2	33.4	0
1196120	143400	BLFT	20070723ABL	K273EZ	MORNINGSTAR MEDIA COMPANY, LLC	D	MESQUITE	NV	LIC	0.218	632	273	1	87	0
1327092	63410	BLH	20090820ABV	KJJJ	STEVEN M. GREELEY	C1	LAUGHLIN	NV	LIC	17	1367	272	0	156	0

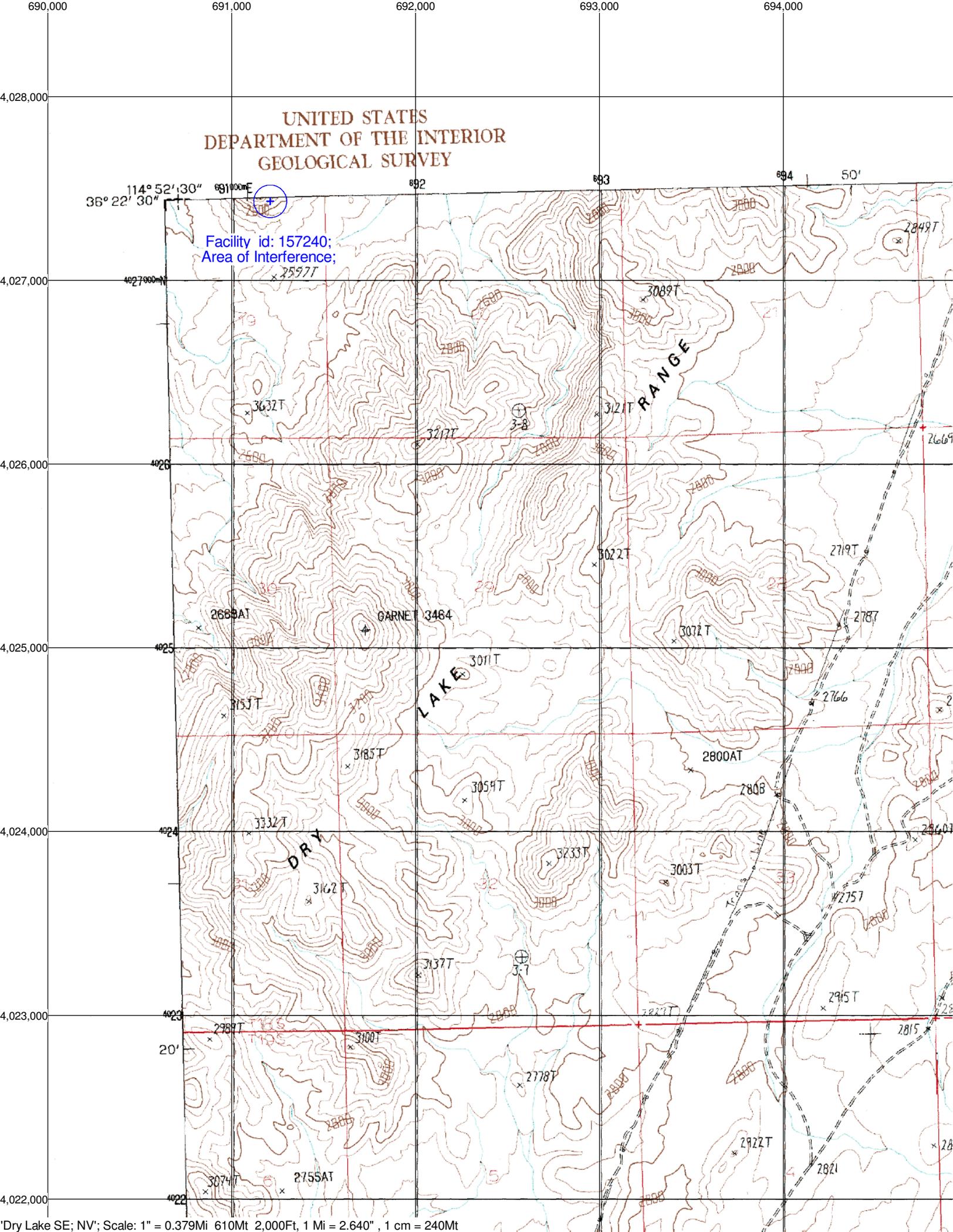
Intermediate Frequencies (53 and 54 channels difference):

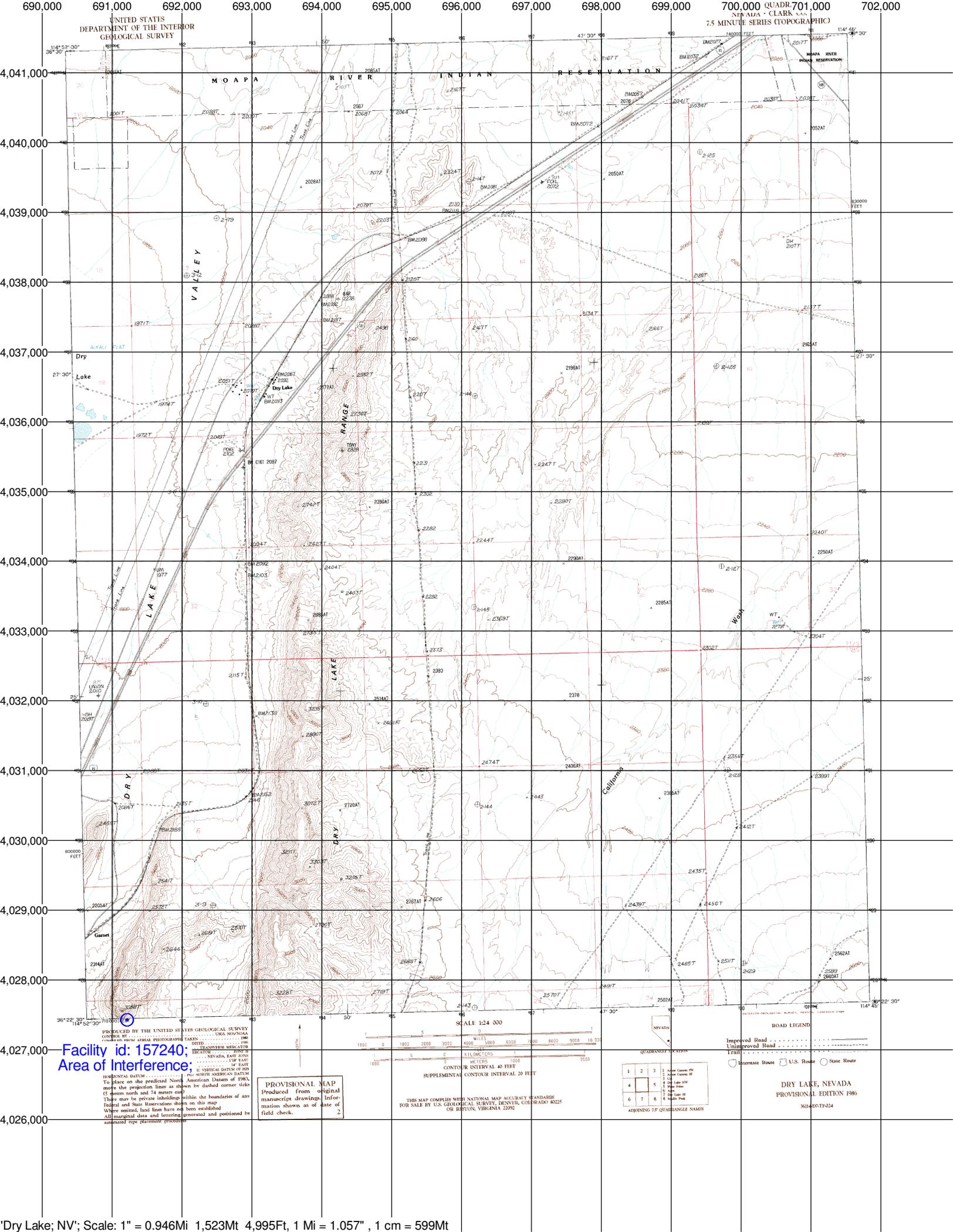
Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
72313	68921	BLED	19840906DM	KUNV	UNIV OF NEVADA SYSTEM BD OF REGENTS	C1	LAS VEGAS	NV	LIC	15	1042	218	54	42.6	20.6

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

114° 52' 30" 36° 22' 30"

Facility id: 157240;
Area of Interference;



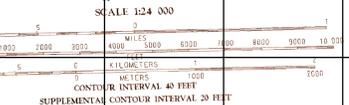


UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

7.5 MINUTE SERIES (TOPOGRAPHIC)
NEVADA - CLARK CO.

PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY
CONTRIBUTOR: AERIAL PHOTOGRAPHY TAKEN IN 1968
DATE: 1978
TRANSVERSE MERCATOR PROJECTION
NEVADA ZONE 11N
E-VERTICAL DATUM OF 1929
NORTH AMERICAN DATUM OF 1983
To place on the predicted North American Datum of 1983, more the projection lines as shown by dashed corner ticks (5 feet north and 74 meters east).
These may be precise inholdings within the boundaries of any Federal and State Reservations shown on this map.
Where unprinted, land lines have not been established.
All marginal data and lettering generated and positioned by automated type placement procedures.

PROVISIONAL MAP
Produced from original manuscript drawings. Information shown as of date of field check.



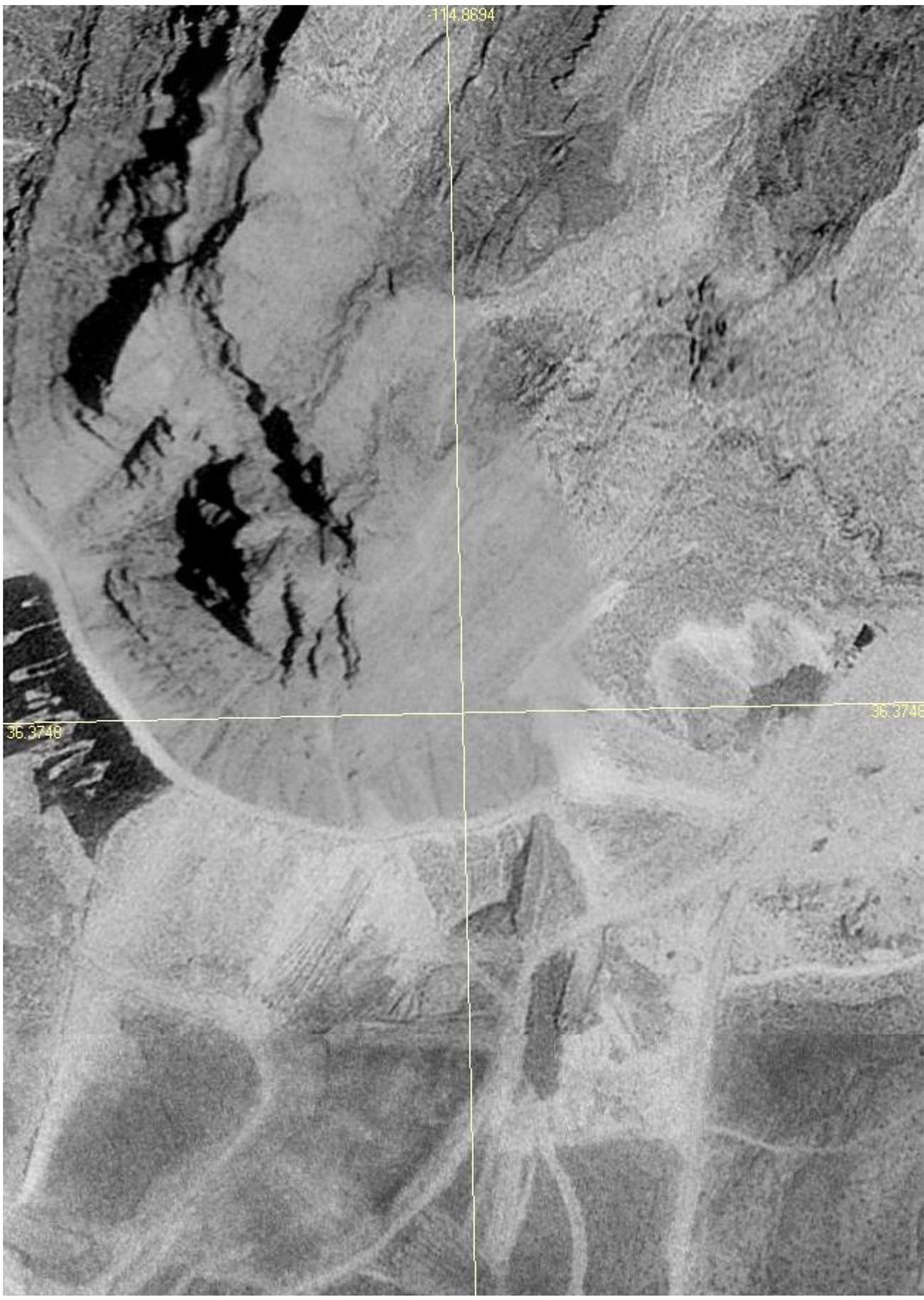
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225 OR RESTON, VIRGINIA 20192

ROAD LEGEND

1	2	3	4	5	6	7	8
Improved Road	Unimproved Road	Interstate Route	U.S. Route	State Route	Quadrangle Location	ADJOINING 7.5' QUADRANGLE NAMES	

NEVADA
CLARK COUNTY
DRY LAKE
GARNET

DRY LAKE, NEVADA
PROVISIONAL EDITION 1986
301437-11-424



-114.8694

36.3748

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