

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317JEG

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 3 of this exhibit.

Page 3 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application must consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

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.

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.

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
KDEL-FM	AR	ARKADELPHIA	265	3000	CLARK COUNTY BROADCASTING, INC.	BLH7391	A	LIC	61.72	3.02 dB	24733
K265CD	AR	PINE BLUFF	265	24	J AND J BROADCASTING	BLFT19850812TA	D	LIC	58.62	4.17 dB	29375
KDEL-FM	AR	ARKADELPHIA	265	0	CLARK COUNTY BROADCASTING, INC.		A	USE	61.72	8.28 dB	24733
KPBQ-FM	AR	PINE BLUFF	267	25000	M.R.S. VENTURES, INC.	BLH19911218KC	C3	LIC	55.92	9.39 dB	52619
KZHE	AR	STAMPS	263	50000	A-1 COMMUNICATIONS, INC.	BLH19920410KC	C2	LIC	82.25	12.81 dB	201
NEW	AR	SHERIDAN	264	92	EDGEWATER BROADCASTING INC.	BNPFT20030317JEW	D	APP	54.78	13.47 dB	151073
KDJE	AR	JACKSONVILLE	262	83000	CLEAR CHANNEL BROADCASTING LIC	BLH19960522KC	C1	LIC	109.03	15.62 dB	23025
NEW	AR	STUTT GART	265	250	EDGEWATER BROADCASTING INC.	BNPFT20030317JFA	D	APP	118.48	18.48 dB	151077
KLEZ	AR	MALVERN	268	6000	NOALMARK BROADCASTING CORPOR	BLH19910329KD	A	LIC	73.95	20.04 dB	39368
KLEZ	AR	MALVERN	268	6000	NOALMARK BROADCASTING CORPOR	BLH19910329KD	A	LIC	73.95	20.04 dB	39368
KMLK	AR	EL DORADO	268	6000	NOALMARK BROADCASTING CORPOR	BLH20001002AGH	A	LIC	74.03	21.67 dB	85169
KLEZ	AR	MALVERN	268	6000	NOALMARK BROADCASTING CORPOR	BPH20020709AAA	A	CP	83.81	22.52 dB	39368
KLEZ	AR	MALVERN	268	6000	NOALMARK BROADCASTING CORPOR	BPH20020709AAA	A	CP	83.81	22.52 dB	39368
KRMD-FM	LA	SHREVEPORT	266	100000	CUMULUS LICENSING CORP.	BPH20011221ABB	C	CP	184.18	24.90 dB	1304
WDMS	MS	GREENVILLE	264	100000	MID-AMERICA BROADCASTING CO.	BMLH19980924KA	C1	LIC	142.01	24.48 dB	41846
KRMD-FM	LA	SHREVEPORT	266	100000	CUMULUS LICENSING CORP.	BPH20030507ACJ	C	APP	184.18	25.52 dB	1304
KHLL	LA	RICHWOOD	265	6000	GILLILAND, INC.	BLH19950306KB	A	LIC	160.89	25.88 dB	15349
KDRE	AR	NORTH LITTLE ROCK	266	6000	FLINN BROADCASTING CORPORATION	BLH19940520KZ	A	LIC	113.69	27.78 dB	49255
KWKK	AR	RUSSELLVILLE	265	6000	MMA LICENSE LLC	BLH19920731KB	A	LIC	175.9	27.98 dB	31884
KRMD-FM	LA	SHREVEPORT	266	98000	CUMULUS LICENSING CORP.	BLH19850228LB	C	LIC	184.18	28.53 dB	1304
KHLL	LA	RICHWOOD	265	0	GILLILAND, INC.		C3	RSV	150.98	29.24 dB	15349
910826MM	LA	RICHWOOD	265	0	URBAN NETWORK COMMUNICATIONS		A	USE	157.16	30.25 dB	69543
NEW	AR	LAKE VILLAGE	266	205	EDGEWATER BROADCASTING INC.	BNPFT20030317JER	D	APP	126.5	34.55 dB	151062
NEW00469	AR	RUSSELLVILLE	265	0	HORNE INDUSTRIALS, INC.		A	USE	175.9	34.03 dB	27672
890209MA	AR	NORTH LITTLE ROCK	266	0	LITTLE ROCK RADIO, INC.		A	USE	112.15	35.64 dB	37800
KAWW-FM	AR	HEBER SPRINGS	264	50000	CALDWELL BROADCASTING, LLC	BLH19940614KB	C2	LIC	186.73	38.33 dB	48748
	OK	BROKEN BOW	265	0		RMspm79*	A	APP	212.8	39.83 dB	0
	OK	BROKEN BOW	265	0		RMbg-94*	A	APP	212.8	39.83 dB	0