

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 148641

Channel 261

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 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Pages 4 through 6 include a plot and a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 7 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 dBμ 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.

Page 8 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 minute 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 the free space equation and 120 radials.

Page 9 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 aerial photo and the USGS Quadrangle indicate the presence of buildings within the zone of predicted interference. These buildings are approximately 25ft in height. This application provides 33ft (10.1m) of ground clearance which is adequate to provide the necessary clearance 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 dB μ 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
497762	BLH20000419ACN	KBEA-FM	72.1	72.1
50887	BLH19821227AK	KKRQ	98.6	96.6
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				72.1

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 **72.1 dB μ** , this makes the proposed translator's worst-case interfering contour **112.1 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **119.4 m** from the transmit antenna.

The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 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 on the following page 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, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the tower ground level (TGL) by **10.1 m** 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 area of interference. Hence, in accordance with 47 C.F.R. § 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 this application is therefore in full compliance with 47 C.F.R. § 74.1204.

Note: the aerial photo and the USGS Quadrangle indicate the presence of buildings within the zone of predicted interference. These buildings are approximately 25ft in height. This application provides 33ft (10.1m) of ground clearance which is adequate to provide the necessary clearance 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: ERI
Antenna Model: 100-1
CORAGL: 73 m
Maximum ERP: 0.047 kW
Interfering Contour: 112.1 dB μ
Max Int. Contour Distance: 119.4 m
Min Ground Clearance: 10.1 m

Depression Angle Below Horizontal	Antenna Relative Field	ERP (watts)	Distance to Interfering Contour from Antenna (m)	Horizontal Distance of Interfering Contour from Tower (m)	Vertical Clearance of Interfering Contour above TGL (m)
5	.997	46.7	119.1	118.6	62.6
10	.987	45.8	117.9	116.1	52.5
15	.970	44.2	115.8	111.9	43.0
20	.947	42.2	113.1	106.3	34.3
25	.918	39.6	109.6	99.3	26.7
30	.883	36.6	105.4	91.3	20.3
35	.842	33.3	100.5	82.4	15.3
40	.796	29.8	95.1	72.8	11.9
45	.744	26.0	88.8	62.8	10.2
50	.688	22.2	82.2	52.8	10.1
55	.627	18.5	74.9	42.9	11.7
60	.563	14.9	67.2	33.6	14.8
65	.495	11.5	59.1	25.0	19.4
70	.425	8.5	50.8	17.4	25.3
75	.352	5.8	42.0	10.9	32.4
80	.278	3.6	33.2	5.8	40.3
85	.202	1.9	24.1	2.1	49.0
90	.126	0.7	15.0	0.0	58.0
Minimum Clearance above TGL:					10.1 m

**PRELIMINARY SPECIFICATION FOR
ERI 100 CIRCULARLY POLARIZED
FM BROADCAST ANTENNA**

*Prepared For
erii
Channel 201*

May 25, 2006

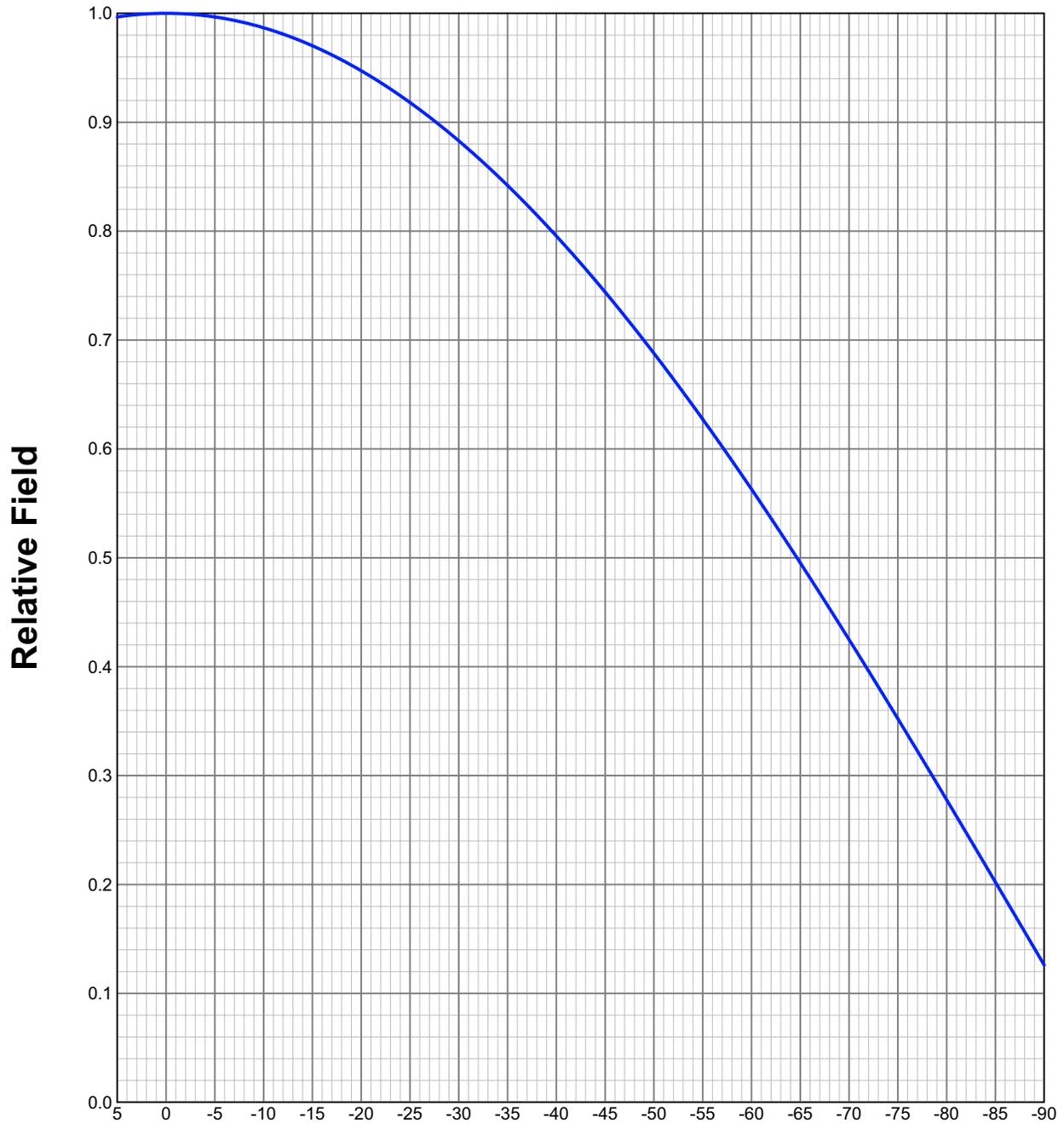
**ANTENNA TYPE:
101-1(F)**

SPECIFICATION NO:



ELEVATION PATTERN

Type:	1001F		Channel:	201
Directivity:	Numeric	dBd	Location:	
Main Lobe:	0.41	-3.82	Beam Tilt:	0.00
Horizontal:	0.41	-3.82	Polarization:	Circular



TABULATED DATA FOR ELEVATION PATTERN

Type: 1001F

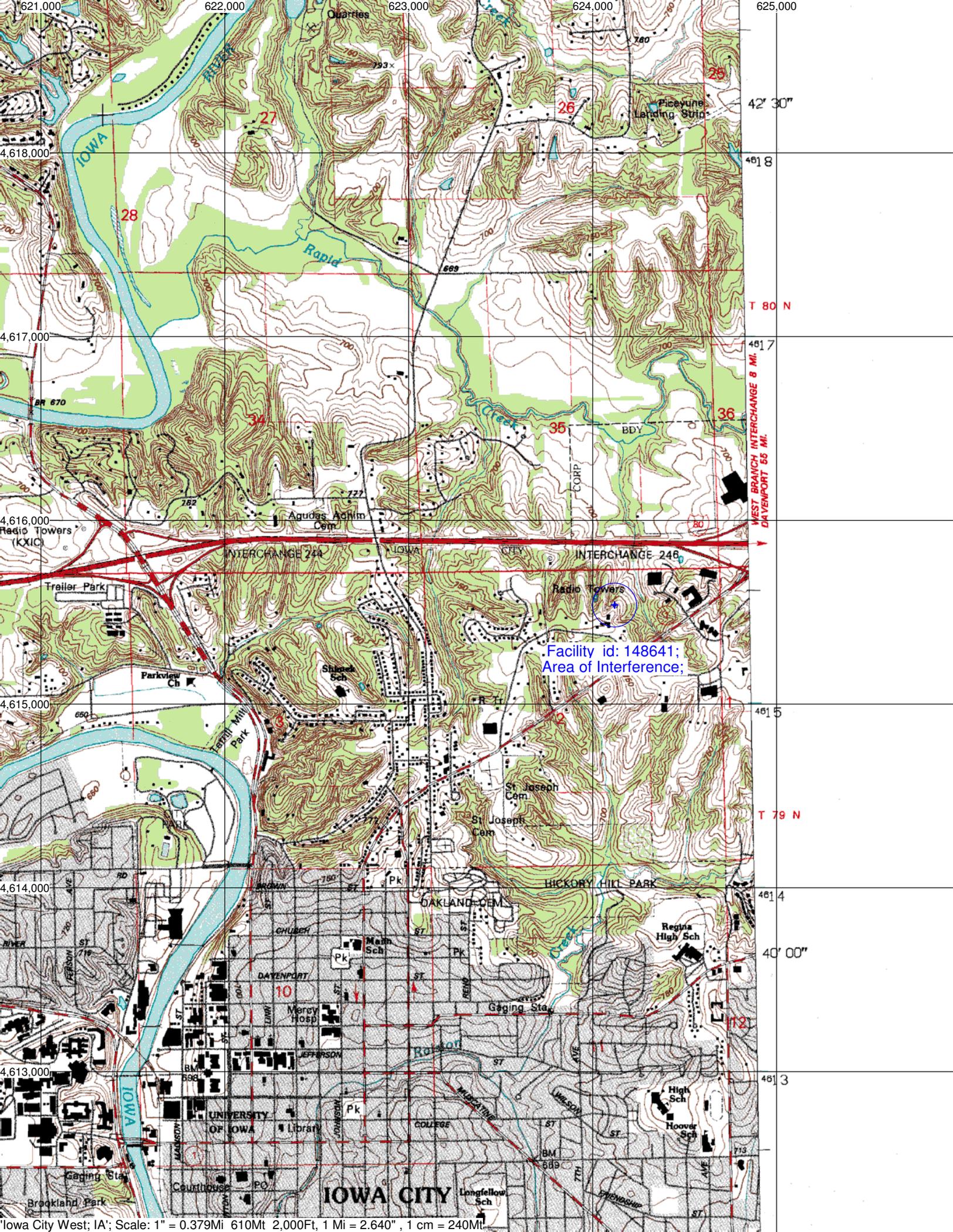
Polarization: Circular

ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB					
5.00	0.997	-0.03	-6.75	0.994	-0.05	-27.00	0.905	-0.87	-50.50	0.682	-3.33	-74.00	0.367	-8.71
4.75	0.997	-0.03	-7.00	0.993	-0.06	-27.50	0.901	-0.90	-51.00	0.676	-3.40	-74.50	0.360	-8.88
4.50	0.997	-0.02	-7.25	0.993	-0.06	-28.00	0.898	-0.94	-51.50	0.670	-3.48	-75.00	0.352	-9.06
4.25	0.998	-0.02	-7.50	0.993	-0.07	-28.50	0.894	-0.97	-52.00	0.664	-3.56	-75.50	0.345	-9.25
4.00	0.998	-0.02	-7.75	0.992	-0.07	-29.00	0.890	-1.01	-52.50	0.658	-3.63	-76.00	0.337	-9.44
3.75	0.998	-0.02	-8.00	0.991	-0.07	-29.50	0.887	-1.04	-53.00	0.652	-3.72	-76.50	0.330	-9.63
3.50	0.998	-0.01	-8.25	0.991	-0.08	-30.00	0.883	-1.08	-53.50	0.646	-3.80	-77.00	0.323	-9.83
3.25	0.999	-0.01	-8.50	0.990	-0.08	-30.50	0.879	-1.12	-54.00	0.640	-3.88	-77.50	0.315	-10.03
3.00	0.999	-0.01	-8.75	0.990	-0.09	-31.00	0.875	-1.16	-54.50	0.634	-3.96	-78.00	0.308	-10.24
2.75	0.999	-0.01	-9.00	0.989	-0.09	-31.50	0.871	-1.20	-55.00	0.627	-4.05	-78.50	0.300	-10.45
2.50	0.999	-0.01	-9.25	0.989	-0.10	-32.00	0.867	-1.24	-55.50	0.621	-4.14	-79.00	0.293	-10.67
2.25	0.999	-0.01	-9.50	0.988	-0.10	-32.50	0.863	-1.28	-56.00	0.615	-4.23	-79.50	0.285	-10.89
2.00	0.999	0.00	-9.75	0.987	-0.11	-33.00	0.859	-1.32	-56.50	0.608	-4.32	-80.00	0.278	-11.13
1.75	1.000	0.00	-10.00	0.987	-0.12	-33.50	0.855	-1.36	-57.00	0.602	-4.41	-80.50	0.270	-11.36
1.50	1.000	0.00	-10.50	0.985	-0.13	-34.00	0.851	-1.41	-57.50	0.596	-4.50	-81.00	0.263	-11.61
1.25	1.000	0.00	-11.00	0.984	-0.14	-34.50	0.846	-1.45	-58.00	0.589	-4.60	-81.50	0.255	-11.86
1.00	1.000	0.00	-11.50	0.982	-0.15	-35.00	0.842	-1.49	-58.50	0.583	-4.69	-82.00	0.248	-12.12
0.75	1.000	0.00	-12.00	0.981	-0.17	-35.50	0.838	-1.54	-59.00	0.576	-4.79	-82.50	0.240	-12.39
0.50	1.000	0.00	-12.50	0.979	-0.18	-36.00	0.833	-1.59	-59.50	0.570	-4.89	-83.00	0.233	-12.67
0.25	1.000	0.00	-13.00	0.978	-0.20	-36.50	0.829	-1.63	-60.00	0.563	-4.99	-83.50	0.225	-12.96
0.00	1.000	0.00	-13.50	0.976	-0.21	-37.00	0.824	-1.68	-60.50	0.556	-5.09	-84.00	0.217	-13.26
-0.25	1.000	0.00	-14.00	0.974	-0.23	-37.50	0.819	-1.73	-61.00	0.550	-5.20	-84.50	0.210	-13.57
-0.50	1.000	0.00	-14.50	0.972	-0.25	-38.00	0.815	-1.78	-61.50	0.543	-5.30	-85.00	0.202	-13.89
-0.75	1.000	0.00	-15.00	0.970	-0.26	-38.50	0.810	-1.83	-62.00	0.536	-5.41	-85.50	0.195	-14.22
-1.00	1.000	0.00	-15.50	0.968	-0.28	-39.00	0.805	-1.88	-62.50	0.530	-5.52	-86.00	0.187	-14.56
-1.25	1.000	0.00	-16.00	0.966	-0.30	-39.50	0.800	-1.93	-63.00	0.523	-5.63	-86.50	0.179	-14.93
-1.50	1.000	0.00	-16.50	0.964	-0.32	-40.00	0.796	-1.99	-63.50	0.516	-5.75	-87.00	0.172	-15.30
-1.75	1.000	0.00	-17.00	0.962	-0.34	-40.50	0.791	-2.04	-64.00	0.509	-5.86	-87.50	0.164	-15.70
-2.00	0.999	0.00	-17.50	0.960	-0.36	-41.00	0.786	-2.10	-64.50	0.502	-5.98	-88.00	0.156	-16.11
-2.25	0.999	-0.01	-18.00	0.957	-0.38	-41.50	0.781	-2.15	-65.00	0.495	-6.10	-88.50	0.149	-16.54
-2.50	0.999	-0.01	-18.50	0.955	-0.40	-42.00	0.776	-2.21	-65.50	0.488	-6.22	-89.00	0.141	-17.00
-2.75	0.999	-0.01	-19.00	0.952	-0.42	-42.50	0.770	-2.27	-66.00	0.481	-6.35	-89.50	0.134	-17.48
-3.00	0.999	-0.01	-19.50	0.950	-0.45	-43.00	0.765	-2.32	-66.50	0.475	-6.48	-90.00	0.126	-17.99
-3.25	0.999	-0.01	-20.00	0.947	-0.47	-43.50	0.760	-2.38	-67.00	0.467	-6.60			
-3.50	0.998	-0.01	-20.50	0.945	-0.49	-44.00	0.755	-2.44	-67.50	0.460	-6.74			
-3.75	0.998	-0.02	-21.00	0.942	-0.52	-44.50	0.749	-2.51	-68.00	0.453	-6.87			
-4.00	0.998	-0.02	-21.50	0.939	-0.54	-45.00	0.744	-2.57	-68.50	0.446	-7.01			
-4.25	0.998	-0.02	-22.00	0.936	-0.57	-45.50	0.739	-2.63	-69.00	0.439	-7.15			
-4.50	0.997	-0.02	-22.50	0.933	-0.60	-46.00	0.733	-2.70	-69.50	0.432	-7.29			
-4.75	0.997	-0.03	-23.00	0.931	-0.63	-46.50	0.728	-2.76	-70.00	0.425	-7.43			
-5.00	0.997	-0.03	-23.50	0.928	-0.65	-47.00	0.722	-2.83	-70.50	0.418	-7.58			
-5.25	0.996	-0.03	-24.00	0.924	-0.68	-47.50	0.716	-2.90	-71.00	0.411	-7.73			
-5.50	0.996	-0.04	-24.50	0.921	-0.71	-48.00	0.711	-2.96	-71.50	0.403	-7.89			
-5.75	0.996	-0.04	-25.00	0.918	-0.74	-48.50	0.705	-3.03	-72.00	0.396	-8.04			
-6.00	0.995	-0.04	-25.50	0.915	-0.77	-49.00	0.699	-3.11	-72.50	0.389	-8.21			
-6.25	0.995	-0.05	-26.00	0.912	-0.80	-49.50	0.694	-3.18	-73.00	0.382	-8.37			
-6.50	0.994	-0.05	-26.50	0.908	-0.84	-50.00	0.688	-3.25	-73.50	0.374	-8.54			

**Adjacent Channel Study
For Station K261DH, Facility_id: 148641**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
50887	29076	BLH	19821227AK	KKRQ	CITICASTERS CO.	C1	IOWA CITY	IA	LIC	100	389	264	3	8.2	0.2805
497762	13666	BLH	20000419ACN	KBEA-FM	CONNOISSEUR COMMUNICATIONS OF QUAD CIT	C1	MUSCATINE	IA	LIC	100	481	259	2	43.7	0.2805
645653	152478	BNPFT	20030317EOC	NEW	EDGEWATER BROADCASTING, INC.	D	MUSCATINE	IA	APP	0.092	330.5	262	1	48.6	0
1094112	133810	BLL	20051026AHS	KUBH-LP	IOWA DEPARTMENT OF TRANSPORTATION	L1	URBANA GARAGE TOW	IA	LIC	0	286	260	1	69.6	0
631895	140538	BNPFT	20030313BKZ	NEW	EDUCATIONAL MEDIA FOUNDATION	D	MOLINE	IA	APP	0.099	328	261	0	72.4	0
1153174	133984	BLL	20061010AME	KRUU-LP	FAIRFIELD YOUTH ADVOCACY, INC.	L1	FAIRFIELD	IA	LIC	0	255.28	261	0	84	0
634506	142571	BNPFT	20030311AOD	NEW	AMERICAN FAMILY ASSOCIATION	D	BURLINGTON	IA	APP	0.25	165	262	1	86.7	0
644942	151850	BNPFT	20030317APR	NEW	COVENANT NETWORK	D	MOLINE	IL	APP	0.045	201	263	2	87.6	0
215682	14627	BLH	19951025KA	KCWN	CROWN BROADCASTING COMPANY	C3	NEW SHARON	IA	LIC	25	324	260	1	106.3	0
155194	9119	BLH	19901204KG	WCCI	CARROLL COUNTY COMMUNICATIONS, INC.	B1	SAVANNA	IL	LIC	9.6	374	262	1	123.7	0
1051496	51332	BLH	20050323ACG	KDRB	CITICASTERS LICENSES, L.P.	C	DES MOINES	IA	LIC	100	837	262	1	175.5	0



Facility id: 148641;
Area of Interference;

91 5089



41.6839

41.6839