

Exhibit 12

Non-Interference Compliance

Channel: 258

Reference to: FCC File Number: BNPFT-20030829AXC Translator Construction Permit W258BJ.

Description of Exhibit 12 Contents

This exhibit will show that the proposed facility complies with contour overlap interference protection provisions in 47 CFR 74.1204. The Proposal is fully spaced to all Domestic Licensed Stations and Construction Permits.

The applicant certifies that should any actual interference occur, operation of the translator will be suspended in accordance with 47 CFR 74.1203.

Page 3, Exhibit 12(a), displays the F(50/50) 60 dbu of the proposed channel 258 modified transmitter site, overlapping the F(50/50) 60 dbu of the original W258BJ Construction permit, thus compliance with CFR, 74.1233(a) (2). Please note that the Primary Station is (WVPS)

Page 4, Exhibit 12 (b), is a Table showing the distance to the F (50,50) 60 dbu contour of the Proposed 99.5 Translator, prepared using ComStudy 2.2. *(Also note the HAAT column of this Exhibit for reference.)

Page 5, Exhibit 12(c), is a Topographical map of the area around the proposed channel 258 translator site.

The proposed channel 258 translator is 21.1 kilometers from the Canadian Border, however there are no known pertinent Canadian facilities, applications, or allocations that this proposal would interfere with. The F(50,10) 34 dbu interfering contour does not extend beyond 60 kilometers, and does not extend beyond the Canadian Border. See page 6. Exhibit 12 (d).

Explanation of ComStudy Frequency Finder Results:

The Interference analysis for the instant application was performed using data taken directly from the FCC's FM database, which looks for prohibited overlap with contours of adjacent stations, and prohibited proximity to stations 53 or 54 channels from the proposed translator station (IF) using 3 arc second terrain data and the FCC's contour algorithms. See results of analysis in Table on Page 7, Exhibit 12(e), and Page 8, Exhibit 12(e1). (ComStudy uses the FCC's FM Database, thus the results included the proposed translator. This line was deleted from the Table to save confusion)

The proposed channel 258 Translator can operate with an effective radiated power of 35 watts at 7-meters AGL. (see page 3, Exhibit 12 (a) Contour Study)

The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). (See page(s) 9, 10, & 11, Exhibit 12(f), FM Worksheet)

*Note: This proposed translator will be co located with a second translator (W270BR) The total aggregate non-ionization emissions at a position of 2 meters above ground (head height) at the base of the tower is 18.7-percent of the maximum for a controlled area. Therefore, this proposal complies with ANSI standards.

*Prop. Ch. 258 Translator will be co-located with W270BR as Modified.

Map Scale: 1:578880 1 cm = 5.79 km V/H Size: 58.40 x 95.39 km

Prop. Ch. 258 Island Pond
Distance to F(50,50) 60 dBu

Site: !Proposed
Coordinates 44-49-05.0 N, 71-52-46.0 W
Freq: 99.50000 MHz
ERP: 35.00 W

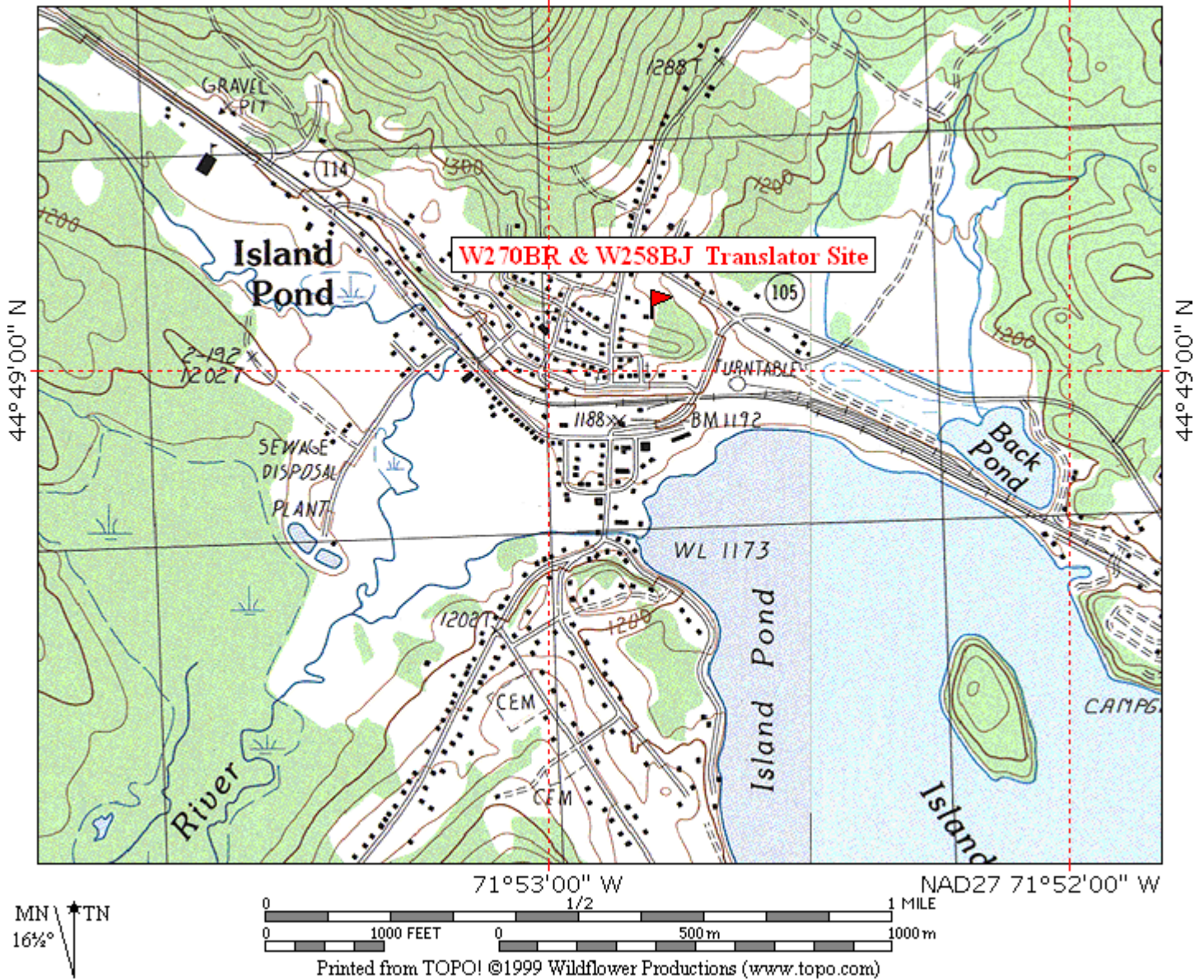
Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0		35	-127	250	4.32	44.856929 71.879444
30		35	-322	300	4.32	44.856924 71.878487
60		35	-100	320	4.32	44.856906 71.877531
90		35	-20	430	4.32	44.856876 71.876574
120		35	4	150	4.32	44.856835 71.875619
150		35	-204	530	4.32	44.856781 71.874665
180		35	-76	330	4.32	44.856716 71.873712
210		35	-140	250	4.32	44.85664 71.872761
240		35	-186	260	4.32	44.856551 71.871812
270		35	-72	270	4.32	44.856451 71.870866
300		35	-46	240	4.32	44.856338 71.869922
330		35	-132	300	4.32	44.856215 71.868981

Prop. Ch. 258 Translator Site

TOPO! map printed on 02/14/08 from "NVermont.tpo" and "Untitled.tpg"

71°53'00" W

NAD27 71°52'00" W



Distance to F(50,10) 34 dBu Contour

Site: Proposed
Coordinates: 44-49-05.0 N, 71-52-46.0 W
Freq: 99.50000 MHz
ERP: 35.00 W

Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0	35	-127	250	20.37	45.001281	71.87944
30	35	-322	300	20.37	45.001253	71.87492
60	35	-100	320	20.37	45.001169	71.8704
90	35	-20	430	20.37	45.001029	71.86588
120	35	4	150	20.37	45.000833	71.86137
150	35	-204	530	20.37	45.000582	71.85686
180	35	-76	330	20.37	45.000274	71.85236
210	35	-140	250	20.37	44.999911	71.84787
240	35	-186	260	20.37	44.999492	71.84338
270	35	-72	270	20.37	44.999018	71.83891
300	35	-46	240	20.37	44.998489	71.83445
330	35	-132	300	20.37	44.997904	71.83

Ch. 270 Frequency Separation Study
Island Pond Vt.

44-49-05.0 N

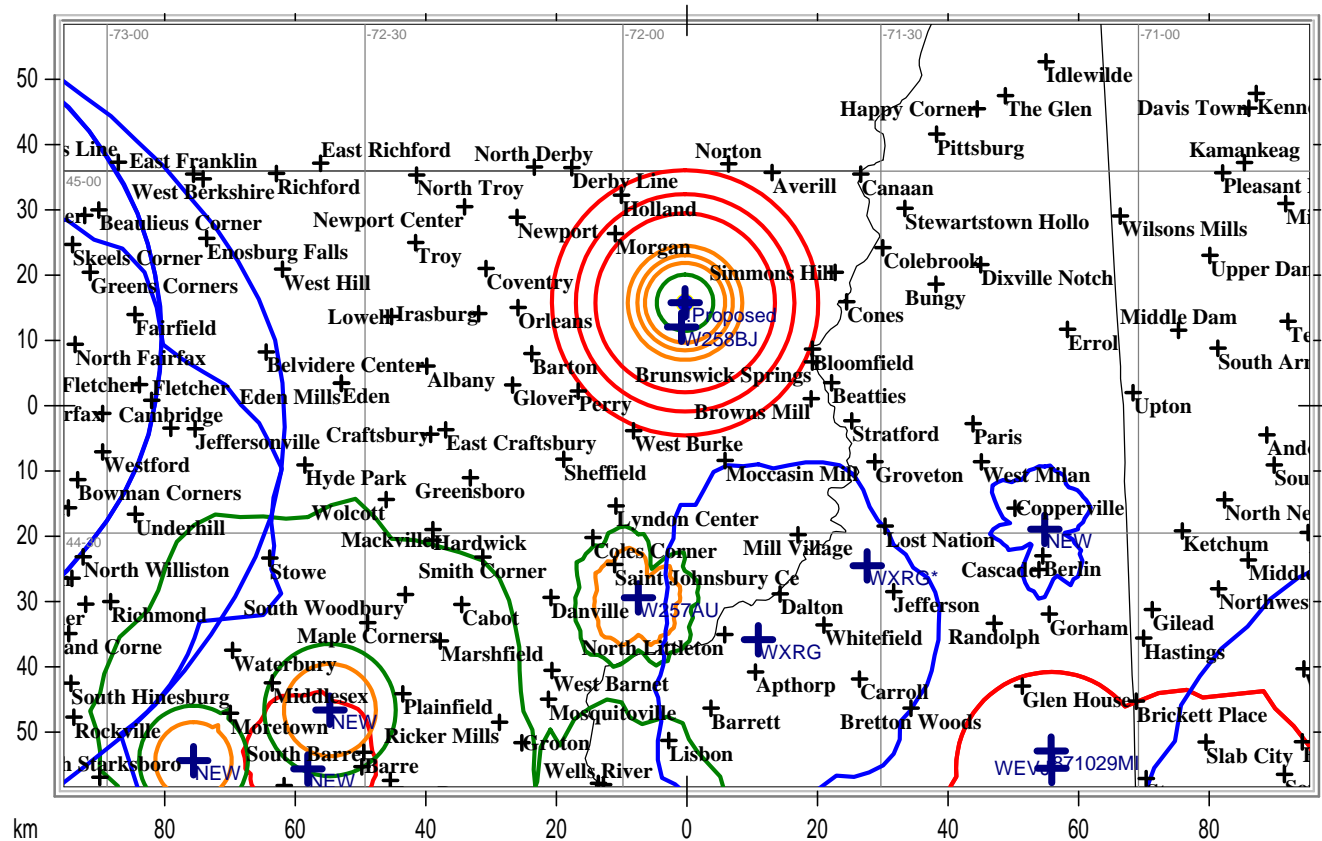
35 Watts ERP

71-52-46.0 W

7 meters AGL

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_kr	Sep	Clr
	QU	MONTREAL	99.5	258	0	B		154.83	0	38.12 dB
	QU	WINDSOR	99.3	257	0	A		83.73	0	38.50 dB
871029MI	NH	JACKSON	99.5	258	0	A	USE	89.03	0	25.51 dB
CIMEMF	QC	STE-ADELE	99.5	258	50000	B		204.23	0	36.30 dB
CJAN-FM	QC	ASBESTOS	99.3	257	11100	B1		103.88	0	31.92 dB
NEW	ME	LEWISTON	99.5	258	13	D	APP	160.96	0	38.12 dB
NEW	NH	BERLIN	100.1	261	10	D	APP	65.31	0	37.15 dB
NEW	VT	BARRE	99.5	258	10	D	APP	92.24	0	16.32 dB
NEW	VT	MONTPELIER	99.3	257	250	D	APP	83.11	0	29.01 dB
NEW	VT	WAITSFIELD	99.7	259	120	D	APP	103.38	0	36.21 dB
W257AU	VT	ST. JOHNSBURY, ETC	99.3	257	5	D	LIC	45.85	0	24.51 dB
W258AW	VT	MIDDLEBURY	99.5	258	38	D	LIC	137.18	0	34.07 dB
W258AZ	VT	NEWBURY	99.5	258	10	D	LIC	87.46	0	23.55 dB
WBTZ	NY	PLATTSBURGH	99.9	260	9900	C	LIC	137.28	0	30.25 dB
WBTZ	NY	PLATTSBURGH	99.9	260	9900	C	LIC	137.31	0	30.28 dB
WBTZ	NY	PLATTSBURGH	99.9	260	100000	C	LIC	137.32	0	23.45 dB
WCLZ	ME	BRUNSWICK	98.9	255	48000	B	LIC	179.83	0	33.02 dB
WCLZ	ME	NORTH YARMOUTH	98.9	255	48000	B	APP	179.83	0	33.02 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	246.3	0	37.64 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	246.3	0	37.64 dB
WCRB	MA	LOWELL	99.5	258	37000	B	LIC	246.3	0	37.64 dB
WEVJ	NH	JACKSON	99.5	258	4700	A	LIC	91.12	0	23.55 dB
WEVJ	NH	JACKSON	99.5	258	4700	A	LIC	91.12	0	23.55 dB
WFRD	NH	HANOVER	99.3	257	6000	A	LIC	133.56	0	35.74 dB
WOKO	VT	BURLINGTON	98.9	255	100000	C1	LIC	112.27	0	24.68 dB
WTHT	ME	AUBURN	99.9	260	28500	B	LIC	158.69	0	30.50 dB
WXRG	NH	WHITEFIELD	99.1	256	460	A	LIC	52.92	0	13.69 dB
WXRG*	NH	WHITEFIELD	99.1	256	0	A	USE	49.13	0	37.74 dB

Prop. Ch. 258 Xlator is fully spaced to all Domestic & Int. Stations, Applications & Allotments



*Prop. Ch. 258 Translator will be co-located with W270BR as Modified.

State Borders Lat/Lon Grid

RF WORKSHEET #1 - FM (including translators & boosters)

PLEASE COPY BEFORE USING. THE DETERMINATION OF COMPLIANCE MAY INVOLVE REPEATED CALCULATIONS. IF LOCATED ON A MULTIPLE FM USER TOWER, PLEASE COMPLETE RF WORKSHEET 1A BEFORE PROCEEDING.

EFFECTIVE RADIATION CENTER HEIGHT

Enter proposed "Height of radiation center above ground" OR as listed in line 1 7 m (1)

Is antenna supporting structure located on the roof of a building? (check one) ☐ Yes ☒ No (2)

If line 2 is "yes," enter the building height measured at the base of the antenna

If line 2 is "no," enter "0" in line 3 -0- m (3)
Subtract line (3) from line (1) 7 m (4)
Subtract the value 2.0 from line (4) 5 m (5)

TOTAL EFFECTIVE RADIATED POWER

(If "beam tilt" is utilized, list maximum values)

List Effective Radiated Power in the Horizontal Plane .70 kW
List Effective Radiated Power in the Vertical Plane .70 kW
Add Lines (6) and (7) OR list value from Line 2 in Worksheet 1A .140 kW (8)

PERCENTAGE OF FCC RF LIMIT(S) FOR MAXIMUM PERMISSIBLE EXPOSURE

Multiply Line (8) by 33.41 4.677 (9)
Multiply the value listed in line (5) by itself 25 (10)
Divide Line (9) by Line (10) .187 (11)
Multiply Line (11) by (100) 18.7% (12)

DETERMINATION OF COMPLIANCE WITH CONTROLLED/OCCUPATIONAL LIMIT

Does Line (12) exceed 100% ☐ Yes ☒ No (13)

IF YOU ANSWERED "YES" IN LINE (13), THE WORKSHEETS MAY NOT BE USED IN THIS CASE. *

IF YOU ANSWERED "NO" IN LINE (13), THEN THE SITE SHOULD COMPLY WITH THE FCC'S CONTROLLED/OCCUPATIONAL RF EXPOSURE LIMITS FOR GROUND LEVEL EXPOSURE. #
CONTINUE

* In this case, you may need to prepare an Environmental Assessment. See Instructions for Section III-A, Item 15 of FCC Form 349.

RF WORKSHEET #1 - FM (continued)**DETERMINATION OF COMPLIANCE WITH THE UNCONTROLLED/GENERAL POPULATION LIMIT**Does Line (12) exceed 20% ☐ Yes ☒ No (14)

IF YOU ANSWERED "NO" IN LINE (14), THEN THE SITE SHOULD COMPLY WITH THE FCC'S UNCONTROLLED/ GENERAL POPULATION RF EXPOSURE LIMITS FOR GROUND LEVEL EXPOSURE. NO FURTHER STUDY REQUIRED.

IF YOU ANSWERED "YES" IN LINE (14), CONTINUE.

Rooftop with restricted access.

If you answered "yes" in Line (14) and "yes" in Line (2) (indicating that the tower is located on the roof of a building), and the general public is not allowed access to the rooftop level, repeat lines 5 through 12, entering the value in Line (1) directly in Line (4). (If Multiple FM Use Tower, recalculations should be in accordance with instructions on Worksheet #1A.) Otherwise, go to the next section.

Upon recalculation, Does Line (12) exceed 20% ☐ Yes ☐ No (15)

IF YOU ANSWERED "YES" IN LINE (15), THE WORKSHEETS MAY NOT BE USED IN THIS CASE. *

IF YOU ANSWERED "NO" IN LINE (15), THEN THE AREA AT GROUND LEVEL SHOULD COMPLY WITH THE FCC'S UNCONTROLLED/GENERAL POPULATION EXPOSURE LIMIT. NO FURTHER STUDY REQUIRED.

Access to base of tower restricted by fencing.

If the tower is not located on the roof of a building, is the base of the tower surrounded by fencing or other restrictive barrier and are appropriate warning signs posted on the fence that adequately detail the nature of the RF exposure environment contained therein? ☐ Yes ☐ No (16)

IF YOU ANSWERED "NO" IN LINE (16), THE WORKSHEETS MAY NOT BE USED IN THIS CASE. *

If you answered "yes" in line (16), what is the distance from the base of the

Multiply Line (9) (as calculated previously) by 5 m (17)

Subtract Line (10) (as calculated previously) from Line (18). (19)

Take the square root of Line (19). m (20)

Is Line (20) less than or equal to Line (17). ☐ Yes ☐ No (21)

IF YOU ANSWERED "YES" IN LINE (21), THEN THE RF FIELD OUTSIDE THE FENCE COMPLIES WITH THE FCC'S UNCONTROLLED/GENERAL POPULATION EXPOSURE LIMIT. NO FURTHER STUDY REQUIRED.

IF YOU ANSWERED "NO" IN LINE (21), THE WORKSHEETS MAY NOT BE USED IN THIS CASE. *

* In this case, you may need to prepare an Environmental Assessment. See Instructions for Section III-C, Item 15 of FCC Form 349.

The procedure below will allow for a "worst-case" determination to be made in situations where several FM stations share a common tower. This determination is based upon the "worst case" assumption that all RF energy is emanating from a single antenna located at the same height (i.e. antenna center of radiation above ground level) as the lowest user on the tower.

Complete this sheet for all call signs.

For each call sign, the total of the Horizontal and the Vertical ERP's must be used. If "beam tilt" is utilized, list maximum values.

COLUMN 1 CALL SIGN	COLUMN 2 HEIGHT OF ANTENNA RADIATION CENTER ABOVE GROUND LEVEL	COLUMN 3 TOTAL EFFECTIVE RADIATED POWER (HORIZONTAL AND VERTICAL)
W270BR	9 meters	.07 kilowatts
W758BJ	7 meters	.07 kilowatts
	meters	kilowatts
	meters	kilowatts
	meters	kilowatts
	meters	kilowatts
	meters	kilowatts

List the smallest value in Column 2 7 m (1)
 List the total of all values in Column 3140 kW

The value listed in line (1) above must be used in line (1) on Worksheet 1.

The value listed in line (2) above must be used in line (8) on Worksheet 2.

Now complete worksheet 1 (except for lines 6 and 7).