

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 154961

Channel 210

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.

Page 4 includes a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 5 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.

Page 6 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.

Since the proposed translator is within 320 km of the Mexican border, 47 C.F.R. § 74.1235(d) has been taken into account and this applicant certifies that in the direction of the Mexican border, the proposed translator's 60 dB μ F(50,50) contour does not lie within 116.3 km of the Mexican border. This application is therefore in full compliance with 47 C.F.R. § 74.1235(d)(2), which states that for translators between 125 and 320 km from the border, "in no event shall the location of the 60 dB μ contour lie within 116.3 km of the Mexican border," and hence complies with 47 C.F.R. § 74.1204(h).

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
136679	BLED19891206KA	KLUX	66.2	65.6
40106	BLED19820315AQ	KEDT-FM	64.7	64.5
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				64.5

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 **64.5 dB μ** , this makes the proposed translator's worst-case interfering contour **104.5 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **186.9 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 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 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 **8 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.

Antenna Manufacturer: NIC
Antenna Model: BKG77
CORAGL: 91 m
Maximum ERP: 0.02 kW
Interfering Contour: 104.5 dB μ
Max Int. Contour Distance: 186.9 m
Min Ground Clearance: 8 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	.999	20.0	186.7	186.0	74.7
10	.982	19.3	183.5	180.7	59.1
15	.954	18.2	178.3	172.2	44.9
20	.918	16.9	171.5	161.2	32.3
25	.871	15.2	162.8	147.5	22.2
30	.818	13.4	152.9	132.4	14.6
35	.758	11.5	141.6	116.0	9.8
40	.691	9.5	129.1	98.9	8.0
45	.616	7.6	115.1	81.4	9.6
50	.538	5.8	100.5	64.6	14.0
55	.465	4.3	86.9	49.8	19.8
60	.391	3.1	73.1	36.5	27.7
65	.313	2.0	58.5	24.7	38.0
70	.239	1.1	44.7	15.3	49.0
75	.176	0.6	32.9	8.5	59.2
80	.128	0.3	23.9	4.2	67.4
85	.103	0.2	19.2	1.7	71.8
90	.105	0.2	19.6	0.0	71.4
Minimum Clearance above TGL:					8 m



BKO77

Vertical	-66	0.297	54	0.479	174	0.468
Values	-63	0.345	57	0.436	177	0.479
-180	0.487	-60	0.391	60	0.391	
-177	0.478	-57	0.436	63	0.345	
-174	0.467	-54	0.479	66	0.297	
-171	0.460	-51	0.523	69	0.253	
-168	0.454	-48	0.568	72	0.211	
-165	0.447	-45	0.616	75	0.176	
-162	0.439	-42	0.661	78	0.145	
-159	0.429	-39	0.706	81	0.120	
-156	0.419	-36	0.745	84	0.105	
-153	0.402	-33	0.783	87	0.100	
-150	0.385	-30	0.818	90	0.105	
-147	0.369	-27	0.852	93	0.118	
-144	0.359	-24	0.881	96	0.134	
-141	0.350	-21	0.910	99	0.151	
-138	0.338	-18	0.934	102	0.168	
-135	0.326	-15	0.954	105	0.185	
-132	0.314	-12	0.972	108	0.202	
-129	0.303	-9	0.987	111	0.219	
-126	0.290	-6	0.999	114	0.236	
-123	0.278	-3	0.999	117	0.252	
-120	0.265	0	1.000	120	0.265	
-117	0.251	3	0.999	123	0.278	
-114	0.236	6	0.999	126	0.290	
-111	0.218	9	0.987	129	0.304	
-108	0.202	12	0.972	132	0.314	
-105	0.185	15	0.954	135	0.327	
-102	0.168	18	0.934	138	0.338	
-99	0.151	21	0.910	141	0.350	
-96	0.134	24	0.881	144	0.360	
-93	0.118	27	0.852	147	0.370	
-90	0.105	30	0.818	150	0.386	
-87	0.100	33	0.783	153	0.403	
-84	0.105	36	0.745	156	0.420	
-81	0.120	39	0.706	159	0.430	
-78	0.145	42	0.661	162	0.440	
-75	0.176	45	0.616	165	0.448	
-72	0.211	48	0.568	168	0.455	
-69	0.253	51	0.523	171	0.461	

Better than SWR

**Adjacent Channel Study
For Station K262AN, Facility_id: 154961**

Co-channel through third adjacent:

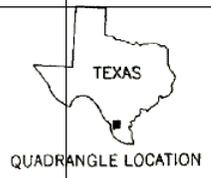
Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
136679	16945	BLED	19891206KA	KLUX	DIOCESAN TELECOMMUNICATIONS CORP.	C1	ROBSTOWN	TX	LIC	58	307	208	2	52.2	0.1193
40106	61172	BLED	19820315AQ	KEDT-FM	SOUTH TEXAS PUBLIC BROADCASTING SYSTEM	C1	CORPUS CHRISTI	TX	LIC	100	247	212	2	56.9	0.1193
1212285	174994	BNPED	20071022AXT	NEW	TEXAS PELICAN MEDIA	A	FREER	TX	APP	0.1	198	207	3	51.4	0
1210105	173642	BNPED	20071019ABS	NEW	INTER-CITY CHRISTIAN YOUTH PROGRAM, INC.	C3	ENCINO	TX	APP	4	163	209	1	88.9	0
1242320	175311	BNPED	20071018ATZ	NEW	MARANATHA CHURCH OF LAREDO INCORPORAT	C2	MCCOY	TX	APP	15	234	213	3	109.7	0
1284604	175309	BNPED	20071018AUA	NEW	MARANATHA CHURCH OF LAREDO INCORPORAT	C1	HOLIDAY BEACH	TX	APP	100	53	210	0	120.8	0
1202823	72878	BLED	20070905ACY	KJMA	LA PROMESA FOUNDATION	C1	FLORESVILLE	TX	LIC	100	284	209	1	135	0



Facility id: 154961;
Area of Interference;

ROAD CLASSIFICATION

- Heavy-duty ————— Light-duty —————
- Medium-duty ————— Unimproved dirt —————
- State Route



SAN DIEGO, TEX.

N2745 - W9807.5/7.5

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AMS 6339 1 SW - SERIES V882