

[Exhibit 12]

## **Non-Interference Compliance**

For an Open Site

Regarding FCC File Number: BNPFT-20030317JBN

Channel: 276

### **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.

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Facility_id	Class	Status	Distance_km	Clr
KYSM-FM	MN	MANKATO	278	100000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19930802KD	20400	C1	LIC	67.12	1.09 dB
NEW	MN	OLIVIA	276	250	RADIO ASSIST MINISTRY INC.	BNPFT20030317IHS	149175	D	APP	54.84	2.88 dB
K222AE	MN	SPRINGFIELD	222	250	PRAIRIE LIGHT CHRISTIAN RADIO	BLFT19950512TC	53312	D	LIC	5.47	5.5
NEW	MN	BLUE EARTH	276	92	RADIO ASSIST MINISTRY INC.	BNPFT20030822AAT	149173	D	APP	88.9	12.70 dB
NEW	MN	BLUE EARTH	276	92	RADIO ASSIST MINISTRY INC.	BNPFT20030317HWM	149173	D	APP	92.17	12.33 dB
KQIC	MN	WILLMAR	273	100000	LAKELAND BROADCASTING COMPANY	BLH19810522AG	36378	C1	LIC	102.48	13.53 dB
KYSM-FM	MN	MANKATO	278	3000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BXPH20000515ACW	20400	C1	CP	67.12	17.89 dB
NEW	MN	MURDOCK	276	250	REFUGE MEDIA GROUP	BNPFT20030312AFO	141147	D	APP	111.9	18.36 dB
NEW	MN	BENSON	276	170	RADIO ASSIST MINISTRY INC.	BNPFT20030317HWG	149171	D	APP	125.33	20.50 dB
K277AI	MN	RUSSELL	277	75	CHRISTIAN HERITAGE BROADCASTING, INC.	BLFT19980622TF	85039	D	LIC	76.76	22.58 dB
NEW	MN	LITCHFIELD	277	250	REFUGE MEDIA GROUP	BNPFT20030822ACK	139422	D	APP	86	23.98 dB
NEW	MN	ALBERT LEA	276	170	RADIO ASSIST MINISTRY INC.	BNPFT20030317HUT	149169	D	APP	146.42	23.89 dB
NEW	MN	LITCHFIELD	277	250	REFUGE MEDIA GROUP	BNPFT20030311ALE	139422	D	APP	86	23.98 dB
WLTE	MN	MINNEAPOLIS	275	100000	INFINITY MEDIA CORPORATION	BLH19910814KD	9641	C0	LIC	162.56	24.84 dB
KJAM-FM	SD	MADISON	276	33000	THREE EAGLES OF BROOKINGS, INC.	BLH199601113K	39578	C2	LIC	184.18	25.87 dB
NEW	IA	GARNER	276	250	RADIO ASSIST MINISTRY INC.	BNPFT20030317DTQ	149158	D	APP	160.64	26.81 dB
KTFG	IA	SIOUX RAPIDS	275	50000	DONALD A. SWANSON	BLH19910308KB	17200	C2	LIC	154.73	30.92 dB
NEW	IA	MASON CITY	276	34	RADIO ASSIST MINISTRY INC.	BNPFT20030317EJP	149160	D	APP	188.72	31.48 dB
KJAM-FM	SD	MADISON	276	0	THREE EAGLES OF BROOKINGS, INC.		39578	C2	USE	184.18	33.53 dB
K274AL	MN	MANKATO	274	250	REFUGE MEDIA GROUP	BLFT19971223TC	79173	D	LIC	68.69	34.76 dB
K274AL	MN	MANKATO	274	250	REFUGE MEDIA GROUP	BPFT20010831ACN	79173	D	CP	68.69	34.76 dB
KFIL-FM	MN	PRESTON	276	9500	KFIL, INC.	BPH20020204AAD	34428	C3	CP	231.18	34.97 dB
NEW	IA	FORT DODGE	276	250	DAVID M. STOUT	BNPFT20030317AOM	147932	D	APP	207.4	34.23 dB
NEW	IA	FORT DODGE	276	250	DAVID M. STOUT	BNPFT20030822ABJ	147932	D	APP	207.41	34.23 dB
KYBB	SD	CANTON	274	50000	SOUTHERN MINNESOTA B/C COMPANY	BLH20010917AAM	15308	C2	LIC	171.47	36.15 dB
KFIL-FM	MN	PRESTON	276	3500	KFIL, INC.	BLH19941223KD	34428	C3	LIC	231.21	36.18 dB
NEW	MN	JACKSON	273	205	EDGEWATER BROADCASTING INC.	BNPFT20030317FUS	148962	D	APP	73.54	37.08 dB
KRRO	SD	SIOUX FALLS	279	38000	MIDCONTINENT RADIO OF S.D., INC.	BLH19981103KB	59814	C2	LIC	171.83	38.16 dB
KYBB	SD	CANTON	274	50000	SOUTHERN MINNESOTA B/C COMPANY	BMPH19930514IH	15308	C2	CP MOD	171.47	38.51 dB
KYTC	IA	NORTHWOOD	274	25000	THREE EAGLES OF MASON CITY, INC.	BLH19991203ACA	49798	C3	LIC	158.02	38.70 dB
KYTC	IA	NORTHWOOD	274	25000	THREE EAGLES OF MASON CITY, INC.	BMPH19991203ACC	49798	C3	CP	158.02	38.70 dB
KYTC	IA	NORTHWOOD	274	25000	THREE EAGLES OF MASON CITY, INC.	BMPH19991203ACC	49798	C3	CP MOD	158.02	38.70 dB
NEW	MN	BRAINERD	276	92	RADIO ASSIST MINISTRY INC.	BNPFT20030317HWW	149174	D	APP	232.88	39.30 dB
NEW	MN	BIG LAKE	277	10	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030317BEK	141749	D	APP	152.46	39.90 dB