

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317KEB

Channel: 273

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 4 of this exhibit.

Page 3 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference protection provisions based on 47 CFR 74.1204(d), which states:

"an 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."

In addition, page 3 includes a tabulation of the second and third adjacent stations which this application is required to protect and the field strengths of those stations in the vicinity of the proposed translator. The field strengths given were based on contours predicted using FCC contour algorithms and 3 arc second terrain data.

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.

Page 4 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application had to consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

Page 5 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 min quadrangle at full scale with the calculated area of interference overlayed. 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 a free-space calculation (see FCC 98-117, Appendix A, pg. 41 for reference to the equation used).

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:

- Since the proposed station's Effective Radiated Power (ERP) is 13 watts, a negative value in km (no units listed in the table) does not represent a violation of the CFR, according to 47 CFR 1204(g), which states that "FM translator stations and booster stations operating with less than 100 watts ERP will be treated as class D stations and will not be subject to intermediate frequency separation requirements."

- 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.

- Entries highlighted in red are those stations where there is overlap of predicted contours and lack of population has been demonstrated within the area of interference.

Compliance with 47 CFR 74.1204(d)

The proposed translator's Maximum Effective Radiated Power (ERP) is 0.013kW at 86 meters above ground level. According to 47 CFR, 74.1204(a), the desired to undesired ratio between 2nd/3rd adjacent stations is 40dB, making the proposed translator's interfering contour 106.4dBu F(50,10).

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), this proposed translator's F(50,10) interference contour was calculated and plotted on the pertinent portion of a USGS quadrangle (page 5 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the calculated area of interference (Note: FCC 02-244, II, A, 6 states that USGS quadrangles are sufficient for demonstrating lack of population). Hence, in accordance with 47 CFR 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 therefore this application is in full compliance with 47 CFR 74.1204.

CORAGL: 86m

Antenna Manufacturer: SWR

Maximum ERP: 0.013kW

Antenna Model: FM1

F(50,10) Interfering Contour: 106.4dBu

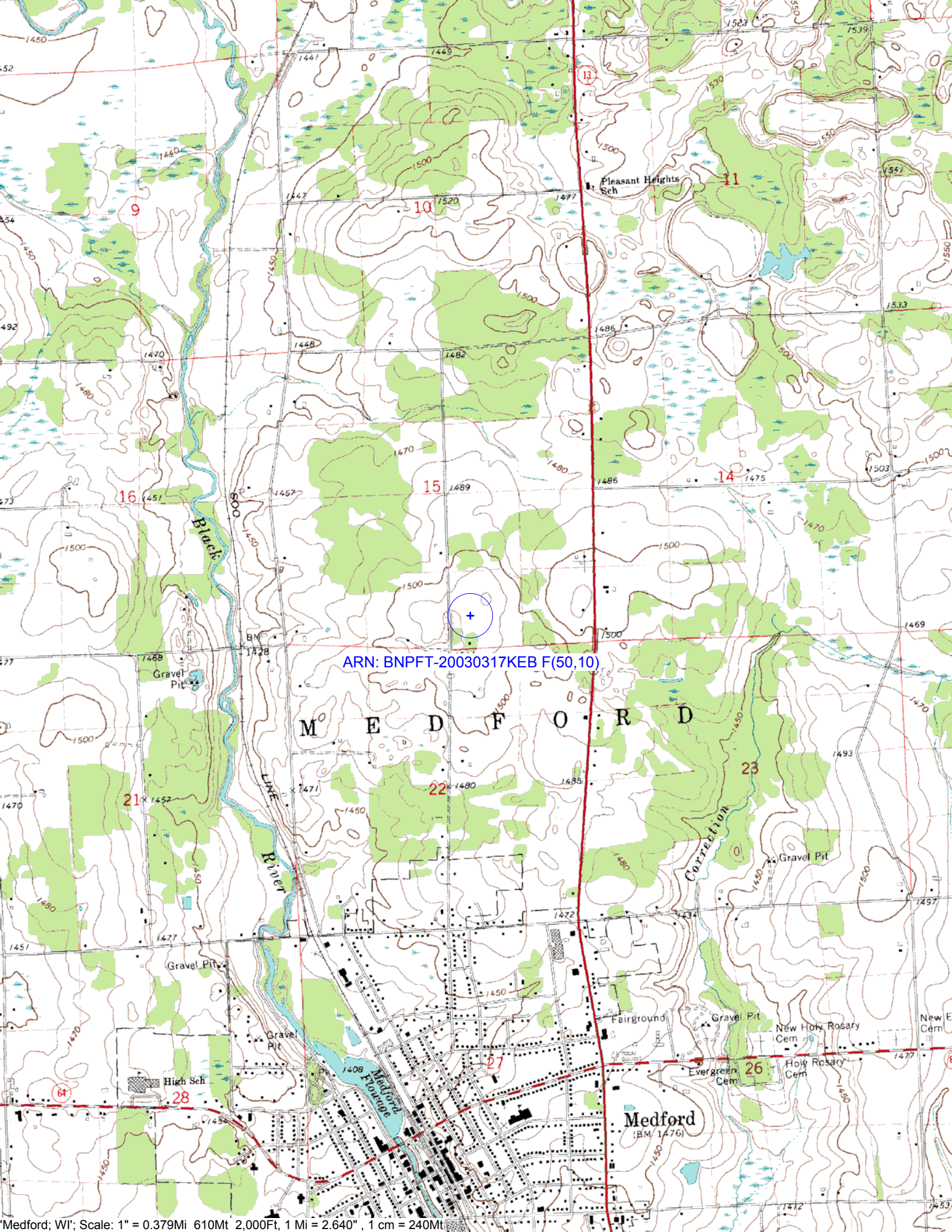
F(50,10) Max Distance: 121.1m

The F(50,50) signal strength of all relevant second and third adjacent stations have been examined, and are tabulated below. Column three shows the station's signal level at the proposed translator's tower site, and column four gives the minimum value within the entire proposed translator's standard F(50,10) contour (100 dBu for most classes, 94 dBu for class B's, 97 dBu for class B1's). For signal levels too great to determine, 999 was entered. The minimum F(50,50) contour within the proposed translator's standard F(50,10) contour was used to calculate the proposed translator's interference contour, thereby assuring a minimum undesired-to-desired ratio of 40dB for all relevant adjacent stations, as required in 47 CFR, 74.1204(a).

FCC File Number	Call Sign	F(50,50) Contour at Tower	Min. F(50,50) Contour
BPH20010112ACV	WDEZ	66.8dBu	66.6dBu
BLH19940318KA	WDEZ	66.6dBu	66.4dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			66.4dBu

Frequency Finder Results

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
WDEZ	WI	WAUSAU	270	99000	W R I G, INC.	BPH20010112ACV	C	CP	57.94	-6.97 dB	70522
WDEZ	WI	WAUSAU	270	93000	W R I G, INC.	BLH19940318KA	C	LIC	57.88	-6.76 dB	70522
NEW	WI	LADYSMITH	272	250	DAVID M. STOUT	BNPFT20030317LUA	D	APP	67.27	21.13 dB	157694
NEW	WI	BLOOMER	273	10	EDGEWATER BROADCASTING INC.	BNPFT20030317KGE	D	APP	88.88	23.24 dB	149979
WRVM	WI	SURING	274	98000	WRVM, INC.	BMLED20020919AAW	C1	LIC	154.21	25.86 dB	73974
NEW	WI	BLOOMER	272	250	DAVID M. STOUT	BNPFT20030317LTM	D	APP	93.16	27.64 dB	157727
NEW	WI	CHIPPEWA FALLS	272	250	DAVID M. STOUT	BNPFT20030317KZJ	D	APP	89.9	29.96 dB	157423
NEW	WI	MARSHFIELD	272	27	EDGEWATER BROADCASTING INC.	BNPFT20030317MLN	D	APP	62.48	30.67 dB	155144
NEW	WI	NEILLSVILLE	274	10	EDGEWATER BROADCASTING INC.	BNPFT20030317MIP	D	APP	67.31	30.45 dB	155168
W275AI	WI	PHILLIPS	275	250	NICOLET BROADCASTING, INC.	BPFT19970821TJ	D	CP	53.5	30.36 dB	88252
NEW	WI	MOSINEE	272	55	EDGEWATER BROADCASTING INC.	BNPFT20030317MJN	D	APP	68.8	32.79 dB	155161
W272AY	WI	PARK FALLS	272	76	TEA-VISZ, INC.	BPFT19970403TB	D	CP	79.92	33.14 dB	86507
KRBR-FM	WI	SUPERIOR	273	100000	MIDWEST COMMUNICATIONS, INC.	BLH19790827AE	C1	LIC	227.17	36.39 dB	71355
W275AC	WI	WAUSAU	275	250	WRIG, INC.	BLFT19950907TE	D	LIC	58.86	37.61 dB	43882
WNWC-FM	WI	MADISON	273	50000	NORTHWESTERN COLLEGE	BMLED20030304AAF	B	LIC	245.77	37.20 dB	49781
NEW	WI	CHIPPEWA FALLS	274	100	CHIPPEWA FALLS CHRISTIAN RADIO, INC.	BNPL20010122ABX	LP100	APP	86.89	37.25 dB	132228
NEW	WI	FOND DU LAC	273	250	SISTER GRACE, INC.	BNPFT20030313AJH	D	APP	213.12	38.70 dB	144636
KMFX-FM	MN	LAKE CITY	273	9400	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19930310KC	C3	LIC	190.06	38.57 dB	54635
WLTE	MN	MINNEAPOLIS	275	100000	INFINITY MEDIA CORPORATION	BLH19910814KD	C0	LIC	219.32	38.32 dB	9641
KEEY-FM	MN	ST. PAUL	271	100000	AMFM RADIO LICENSES, L.L.C.	BLH19910814KJ	C	LIC	219.32	38.32 dB	59967
WHTL-FM	WI	WHITEHALL	272	1550	THE WHTL GROUP, L.L.C.	BLH19980630KB	A	LIC	111.86	39.64 dB	72325



ARN: BNPFT-20030317KEB F(50,10)