

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317HGT

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 10 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 0.01kW at 147 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 106.9dBu 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 the maximum horizontal plane was plotted on the pertinent portion of a USGS quadrangle (page 5 of this exhibit). However, the proposed translator's area of interference extends a maximum of 100.2 meters from the transmit antenna. Since the translator's center of radiation is 147 meters above ground level, the area of interference will be at least 46.8 meters above tower ground level (TGL) 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 proposed area of interference. 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), there is a lack of population within the proposed area of interference and therefore this application is in full compliance with 47 CFR 74.1204.

CORAGL: 147m

Maximum ERP: 0.01kW

F(50,10) Interfering Contour: 106.9dBu

F(50,10) Max Distance: 100.2m

Antenna Manufacturer: SWR

Antenna Model: FM1

F(50,10) Clearance above TGL: 46.8m

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
BPH20030325ACC	WSYR-FM	70.3dBu	69.9dBu
BLH19991221ABA	WSYR-FM	67.2dBu	66.9dBu
BLH20020513AAH	WLDI	84.6dBu	84.3dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Application's Standard F(50,10) Contour:			66.9dBu

Frequency Finder Results

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
WLDI	FL	FORT PIERCE	238	100000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH20020513AAH	C1	LIC	23.61	-24.97 dB	2680
WSYR-FM	FL	GIFFORD	234	50000	CAPSTAR TX LIMITED PARTNERSHIP	BPH20030325ACC	C2	CP	26.16	-10.69 dB	40988
WSYR-FM	FL	GIFFORD	234	22500	CAPSTAR TX LIMITED PARTNERSHIP	BLH19991221ABA	C3	LIC	26.15	-7.61 dB	40988
WBVD	FL	MELBOURNE	236	6000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19951002KD	A	LIC	88.19	18.88 dB	11409
WLDI	FL	FORT PIERCE	238	1900	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BPH19960709IE	C1	CP	64.8	21.80 dB	2680
WZTA	FL	MIAMI BEACH	235	100000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BMLH19940613KG	C0	LIC	150.78	24.81 dB	51979
WLDI	FL	FORT PIERCE	238	0	CLEAR CHANNEL BROADCASTING LICENSES, INC.		C1	USE	23.59	24.25 dB	2680
880310NG	FL	GIFFORD	234	0	ANA R. AVELLO		C3	USE	26.25	25.85 dB	2186
WSYR-FM	FL	GIFFORD	234	0	CAPSTAR TX LIMITED PARTNERSHIP		C2	USE	26.16	25.85 dB	40988
WBVD	FL	MELBOURNE	236	0	CAPSTAR TX LIMITED PARTNERSHIP		A	USE	94.05	27.79 dB	11409
WWRM	FL	TAMPA	235	97300	COX RADIO, INC.	BLH20010521ABA	C	LIC	199.98	31.47 dB	74200
WARO	FL	NAPLES	233	99000	MERIDIAN BROADCASTING, INC.	BLH19881007KA	C0	LIC	176.74	31.41 dB	66224
WWRM	FL	TAMPA	235	100000	COX RADIO, INC.	BLH19980714KF	C	LIC	198.04	32.89 dB	74200
WWRM	FL	TAMPA	235	100000	COX RADIO, INC.	BXPH20010716AAC	C	CP	199.98	32.87 dB	74200
WOLZ	FL	FORT MYERS	237	79000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19950711KA	C1	LIC	177.9	34.28 dB	13898
NEW	FL	VERO BEACH	239	100	FRIENDS OF ST SEBASTIAN EDUCATIONAL ASSOCIATION	BNPL20010613AAQ	LP100	APP	44.04	35.19 dB	134509
WCFB	FL	DAYTONA BEACH	233	96000	COX RADIO, INC.	BPH20021009AAC	C	CP	215.05	35.95 dB	10343
WCFB	FL	DAYTONA BEACH	233	96000	COX RADIO, INC.	BLH19910319KC	C	LIC	215.23	36.02 dB	10343
NEW	FL	PALM BAY	289	100	ATMOSPHERE ENTERTAINMENT GROUP	BNPL20010615AFA	LP100	APP	46.31	39.3	135210

