

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317DOS

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 application's Maximum Effective Radiated Power (ERP) is 0.01kW at 146 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 application's interfering contour 110.2dBu 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: 146m

Antenna Manufacturer: SWR

Maximum ERP: 0.01kW

Antenna Model: FM1

F(50,10) Interfering Contour: 110.2dBu

F(50,10) Max Distance: 68.5m

The F(50,50) signal strength of all relevant second and third adjacent stations have been examined, and are tabulated below. The levels of signal recorded are that at the proposed translator's tower site and 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
BLH19800505AB	WQHQ	84.6dBu	85.5dBu
BLH19980630KF	WOCQ	70.6dBu	70.2dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Application's 100dBu F(50,10) Contour:			70.2dBu

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
WQHQ	MD	OCEAN CITY-SAL	284	33000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19800505AB	B	LIC	13.81	-32.39 dB	28166
WOCQ	MD	BERLIN	280	6000	GREAT SCOTT BROADCASTING	BLH19980630KF	A	LIC	16.01	-11.02 dB	47107
	DE	MILLSBORO	228	0			B	APP	14.32	-0.7	96607
NEW	DE	LEWES	282	27	EDGEWATER BROADCASTING INC.	BNPFT20030317CZH	D	APP	33.26	2.25 dB	151295
WZBH	DE	MILLSBORO	228	50000	GREAT SCOTT BROADCASTING	BPH19970620IA	B	APP	17.84	2.8	25003
WZBH	DE	GEORGETOWN	228	11000	GREAT SCOTT BROADCASTING	BLH19881115KH	B1	LIC	17.84	5.8	25003
WQHQ	MD	OCEAN CITY-SAL	284	0	CAPSTAR TX LIMITED PARTNERSHIP		B	USE	13.81	8.47 dB	28166
WOCQ	MD	BERLIN	280	0	GREAT SCOTT BROADCASTING		A	USE	16.01	16.99 dB	47107
WXFB	MD	BALTIMORE	282	32000	CITICASTERS LICENSES, L.P.	BLH19980219KF	B	LIC	159.42	21.60 dB	8684
WMGM	NJ	ATLANTIC CITY	279	50000	SOUTH JERSEY RADIO, INC.	BLH19971121KA	B	LIC	120.44	22.03 dB	61100
WWZZ	MD	WALDORF	281	50000	BONNEVILLE HOLDING COMPANY	BMLH19960510KD	B	LIC	150.3	24.05 dB	74212
WWZZ	MD	WALDORF	281	20000	BONNEVILLE HOLDING COMPANY	BMLH19990722KB	B	LIC	150.3	25.55 dB	74212
WXCZ	MD	HAVRE DE GRACE	279	37000	DELMARVA BROADCASTING COMPANY	BLH20021015ABT	B	LIC	151.76	29.54 dB	53488
WNVZ	VA	NORFOLK	283	49000	ENTERCOM NORFOLK LICENSE, LLC	BMLH19920911KA	B	LIC	184.88	30.82 dB	40755
NEW	NJ	WILDWOOD	281	19	EDGEWATER BROADCASTING INC.	BNPFT20030317EYX	D	APP	68.85	31.69 dB	152810
WSNI-FM	PA	PHILADELPHIA	283	16000	AMFM RADIO LICENSES, L.L.C.	BMLH19930216KA	B	LIC	180.01	31.67 dB	53969
WSNI-FM	PA	PHILADELPHIA	283	11000	AMFM RADIO LICENSES, L.L.C.	BMLH19880301KB	B	LIC	180.01	32.43 dB	53969
WEMG-FM	NJ	EGG HARBOR CITY	285	10000	MEGA COMMUNICATIONS OF EGG HARBOR	BLH19910726KB	B1	LIC	132.21	33.22 dB	57357
WXFB	MD	BALTIMORE	282	0	CITICASTERS LICENSES, L.P.		B	USE	159.44	35.01 dB	8684
NEW	NJ	SEA ISLE CITY	281	66	CALVARY CHAPEL OF TWIN FALLS, INC.	BNPFT20030310AQV	D	APP	97.97	36.30 dB	140732
NEW	NJ	RIO GRANDE	283	38	EDWARD A. SCHOBEL	BNPFT20030311ACN	D	APP	91.01	36.65 dB	141493
NEW	NJ	RIO GRANDE	281	38	EDWARD A. SCHOBEL	BNPFT20030311ACM	D	APP	91.01	36.65 dB	141492
NEW	NJ	PALERMO	281	38	EDWARD A. SCHOBEL	BNPFT20030311AAQ	D	APP	98.01	37.84 dB	142154

