

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 150648

Channel 215

### **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 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 dBμ 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 4 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.

Page 5 of this exhibit is a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by the U.S. Geological Survey's National Aerial Photography Program. It has been included to provide clarification of the nature of the buildings in the vicinity.

**Note: The USGS Quadrangle and the aerial photo show the presence of buildings near the zone of predicted interference. These building are uninhabited tower support or communications buildings, so 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**

## 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 $\mu$  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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1104336	BLED20060106ABX	KWTH	57.4	57.3
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>57.3</b>

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 **57.3 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **97.3 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **302.7 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population"). 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.

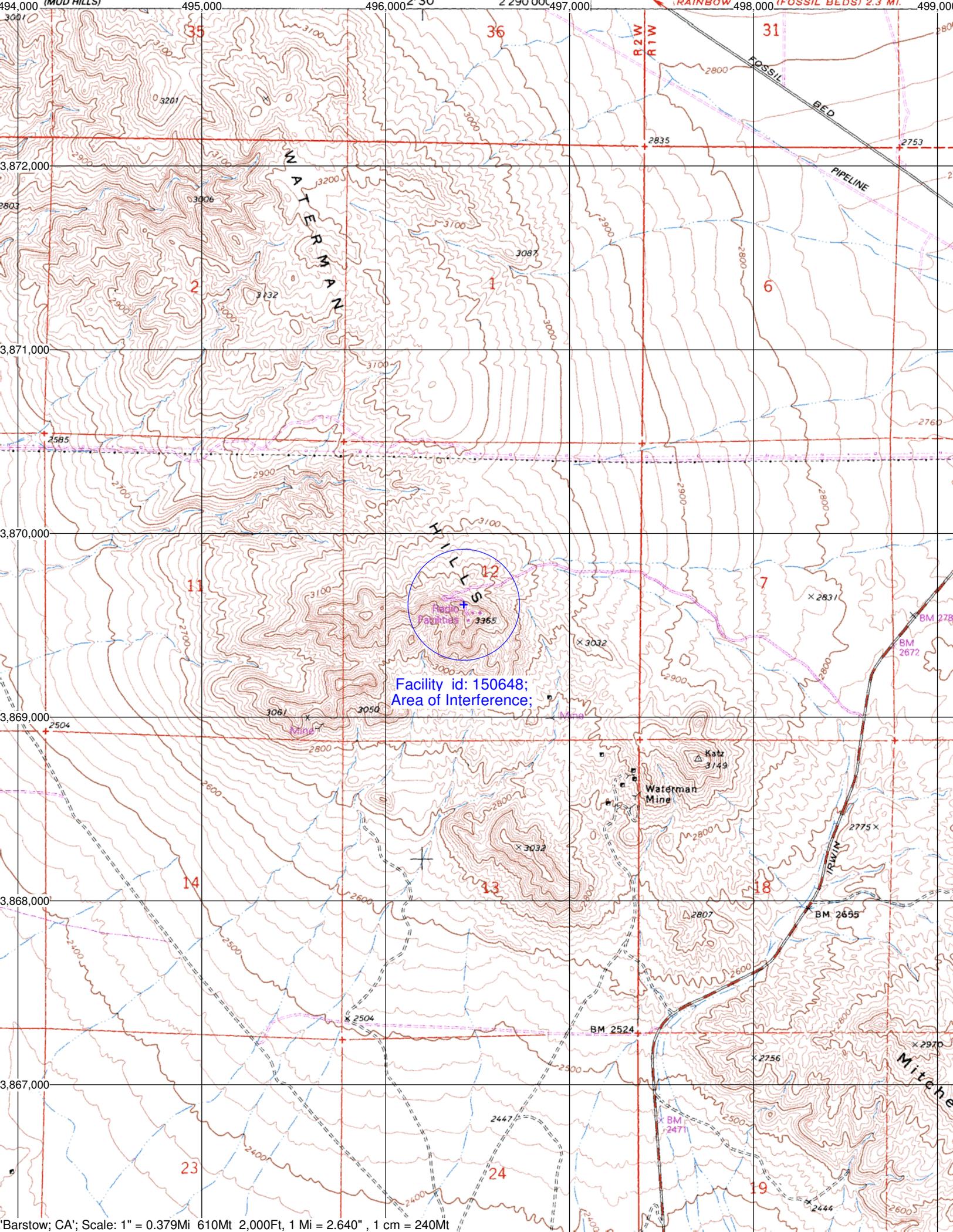
**Note: The USGS Quadrangle and the aerial photo show the presence of buildings near the zone of predicted interference. These building are uninhabited tower support or communications buildings, so a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204**

**Antenna Manufacturer:** SCA  
**Antenna Model:** FMV  
**CORAGL:** 17 m  
**Maximum ERP:** 0.01 kW  
**Interfering Contour:** 97.3 dB $\mu$   
**Max Int. Contour Distance:** 302.7 m

**Adjacent Channel Study  
For Station K215ET, Facility\_id: 150648**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1207092	173000	BNPED	20071012APS	NEW	SANTA MONICA COMMUNITY COLLEGE DISTRICT	B	BARSTOW	CA	APP	15	1024	212	3	0	0.2376
1203023	172358	BNPED	20071017ABL	NEW	UNIVERSITY OF SOUTHERN CALIFORNIA	B	BARSTOW	CA	APP	25	915	212	3	16.2	0.2376
1104336	87122	BLER	20060106ABX	KWTH	LIVING PROOF, INC.	B	BARSTOW	CA	LIC	1.55	1838	217	2	52.3	0.2376
1214839	176624	BNPED	20071022AII	NEW	HARVEST TIME APOSTOLIC MINISTRIES	A	BARSTOW	CA	APP	5	730	212	3	9	0.0597
1214469	176401	BNPED	20071019AOD	NEW	GOSPEL SPOTS, INC	C3	BARSTOW	CA	APP	25	814	212	3	10.5	0.0597
1210098	173635	BNPED	20071019AXE	NEW	SAN BERNARDINO COMMUNITY COLLEGE DISTR	C2	BARSTOW	CA	APP	8	966.9	212	3	13.5	0.0597
1068920	8427	BLFT	20050620ABM	K212BD	CALVARY CHAPEL OF TWIN FALLS, INC.	D	BARSTOW	CA	LIC	0.006	1397	212	3	18.6	0
1213979	176096	BNPED	20071022ABZ	NEW	3. CENTRO CRISTIANO COSECHA FINAL	A	BORON	CA	APP	1.5	1002	212	3	44	0
621276	76689	BLFT	20021219ABI	K212EK	CALVARY CHAPEL OF TWIN FALLS, INC.	D	VICTORVILLE	CA	LIC	0.01	1399	212	3	46	0
1065040	89174	BLER	20050525ARH	KFRJ	FAMILY STATIONS, INC.	B	CHINA LAKE	CA	LIC	3	1354	216	1	82.3	0
278084	86707	BLFT	19981203TL	K213CH	FAMILY STATIONS, INC.	D	RIDGECREST	CA	LIC	0.01	1354	213	2	82.3	0
286819	88908	BLFT	19990706UB	K217DA	PAULINO BERNAL EVANGELISM	D	RIDGECREST	CA	LIC	0.01	1332	217	2	82.3	0
1141650	88908	BSTA	20060724ACB	K217DA	PAULINO BERNAL EVANGELISM	D	RIDGECREST	CA	APP	0.01	1310	217	2	82.3	0
1204030	89174	BPED	20070907AGW	KFRJ	FAMILY STATIONS, INC.	B	CHINA LAKE	CA	CP	5.5	1351	216	1	82.3	0
1091313	8434	BLFT	20051011ABZ	K218DU	CALVARY CHAPEL OF TWIN FALLS, INC.	D	RIDGECREST	CA	LIC	0.038	741	218	3	95.5	0
1212849	175355	BNPED	20071019ABM	NEW	RIDGECREST SEVENTH-DAY ADVENTIST CHURC	B	RIDGECREST	CA	APP	3.5	1220	212	3	105.6	0
1224758	173947	BNPED	20071022ABF	NEW	5. CENTRO CRISTIANO DE FE, INC	A	YUCCA VALLEY	CA	APP	6	1002	213	2	111.7	0
1047497	51252	BXPED	20050222AAF	KPFK	PACIFICA FOUNDATION, INC.	B	LOS ANGELES	CA	CP	1.1	1752	214	1	125.1	0



117.0400

34.9709

34.9709

