

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 91707

Channel 213

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 dB μ 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 quadrangle and aerial photo indicate the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision. The zone of predicted interference extends 452.4m from the proposed transmit site. The nearest building is 510m away, 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 dBμ 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1249459	BPED20080205AGG	KUTX	105.5	102.7
1286337	BLED20080324AJA	KLTP	72.8	67.7
143411	BLFT19900102TB	K215BH	60.8	60.8
223897	BLED19960424KA	KUTX	104.9	102.2
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				60.8

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 **60.8 dBμ**, this makes the proposed translator's worst-case interfering contour **100.8 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **452.4 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").

Note: The quadrangle and aerial photo indicate the presence of county roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision. The zone of predicted interference extends 452.4m from the proposed transmit site. The nearest building is 510m away, 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: TEL
Antenna Model: ANT90D
CORAGL: 9 m
Maximum ERP: 0.05 kW
Interfering Contour: 100.8 dBμ
Max Int. Contour Distance: 452.4 m

Adjacent Channel Study
For Station K213EW, Facility_id: 91707

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1249459	9776	BPED	20080205AGG	KUTX	THE UNIVERSITY OF TEXAS AT AUSTIN	C2	SAN ANGELO	TX	CP	6	857	211	2	2.5	0.2984
223897	9776	BLED	19960424KA	KUTX	THE UNIVERSITY OF TEXAS AT AUSTIN	C2	SAN ANGELO	TX	LIC	5	907	211	2	2.5	0.2984
1286337	120615	BLED	20080324AJA	KLTP	EDUCATIONAL MEDIA FOUNDATION	C3	SAN ANGELO	TX	LIC	2.915	790	215	2	16.4	0.2984
143411	10952	BLFT	19900102TB	K215BH	CHRISTIAN BROADCASTING COMPANY, INC.	D	SAN ANGELO	TX	LIC	0.316	759	215	2	17.3	0.2984



Facility_id: 91707;
Area of Interference;

