

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 151684

Channel 279

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 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Pages 4 through 6 include a plot and a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 7 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 8 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.

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
191191	BMLH19931025KA	KAZR	60.2	60.2
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			60.2

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 **60.2 dBμ**, this makes the proposed translator's worst-case interfering contour **100.2 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **108.4 m** from the transmit antenna.

The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated on the following page at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free-space calculation that neglects any loss due to reflection, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the tower ground level (TGL) by **9.9 m** 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 area of interference. 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.

Antenna Manufacturer: ERI
Antenna Model: 100-1
CORAGL: 67 m
Maximum ERP: 0.0025 kW
Interfering Contour: 100.2 dBμ
Max Int. Contour Distance: 108.4 m
Min Ground Clearance: 9.9 m

Depression Angle Below Horizontal	Antenna Relative Field	ERP (watts)	Distance to Interfering Contour from Antenna (m)	Horizontal Distance of Interfering Contour from Tower (m)	Vertical Clearance of Interfering Contour above TGL (m)
5	.997	2.5	108.1	107.6	57.6
10	.987	2.4	107.0	105.4	48.4
15	.970	2.4	105.1	101.6	39.8
20	.947	2.2	102.6	96.5	31.9
25	.918	2.1	99.5	90.2	25.0
30	.883	1.9	95.7	82.9	19.1
35	.842	1.8	91.3	74.8	14.7
40	.796	1.6	86.3	66.1	11.5
45	.744	1.4	80.6	57.0	10.0
50	.688	1.2	74.6	47.9	9.9
55	.627	1.0	68.0	39.0	11.3
60	.563	0.8	61.0	30.5	14.2
65	.495	0.6	53.7	22.7	18.4
70	.425	0.5	46.1	15.8	23.7
75	.352	0.3	38.2	9.9	30.1
80	.278	0.2	30.1	5.2	37.3
85	.202	0.1	21.9	1.9	45.2
90	.126	0.0	13.7	0.0	53.3
Minimum Clearance above TGL:					9.9 m

**PRELIMINARY SPECIFICATION FOR
ERI 100 CIRCULARLY POLARIZED
FM BROADCAST ANTENNA**

*Prepared For
erii
Channel 201
May 25, 2006*

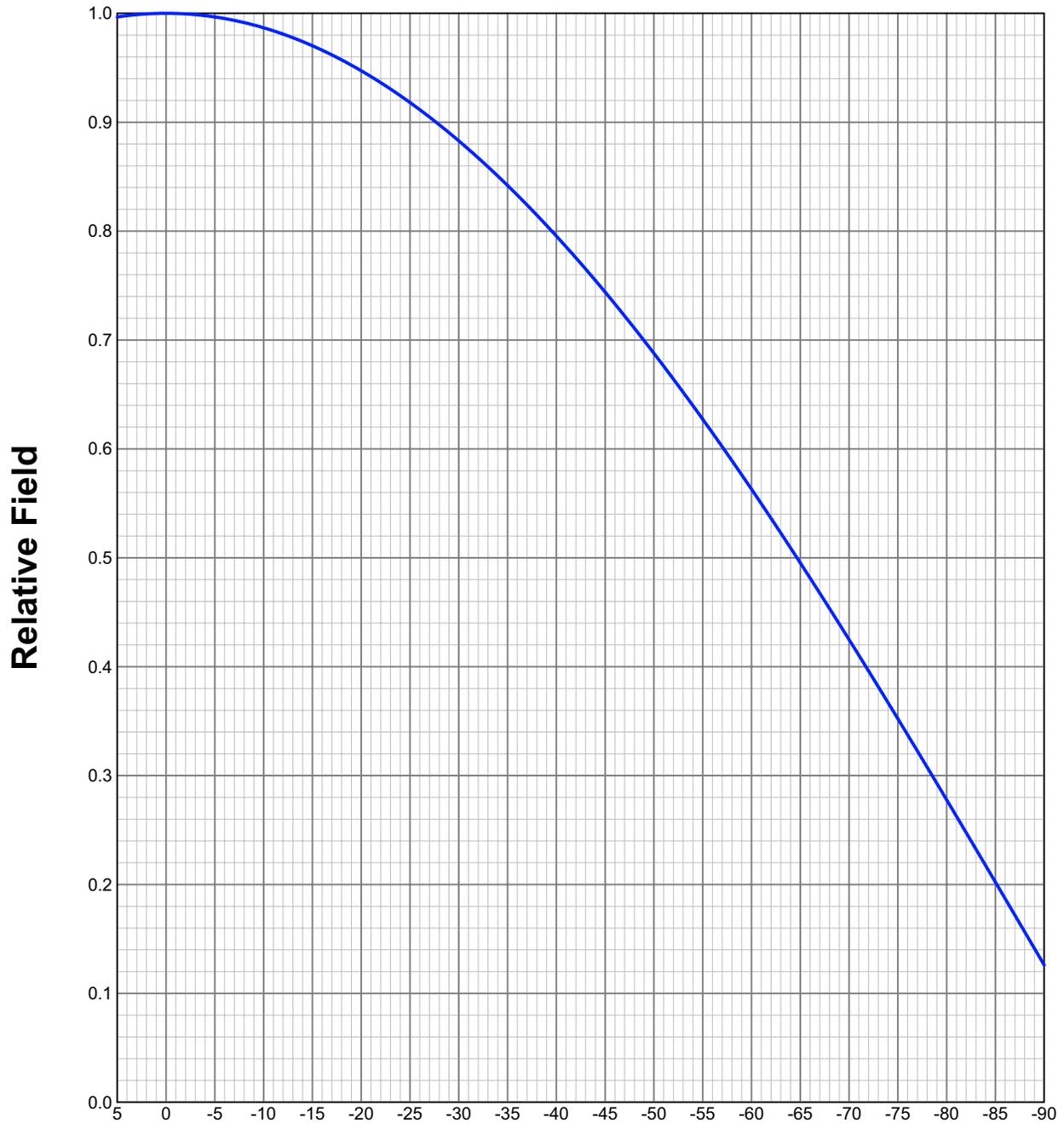
**ANTENNA TYPE:
101-1(F)**

SPECIFICATION NO:



ELEVATION PATTERN

Type:	1001F		Channel:	201
Directivity:	Numeric	dBd	Location:	
Main Lobe:	0.41	-3.82	Beam Tilt:	0.00
Horizontal:	0.41	-3.82	Polarization:	Circular



TABULATED DATA FOR ELEVATION PATTERN

Type: 1001F

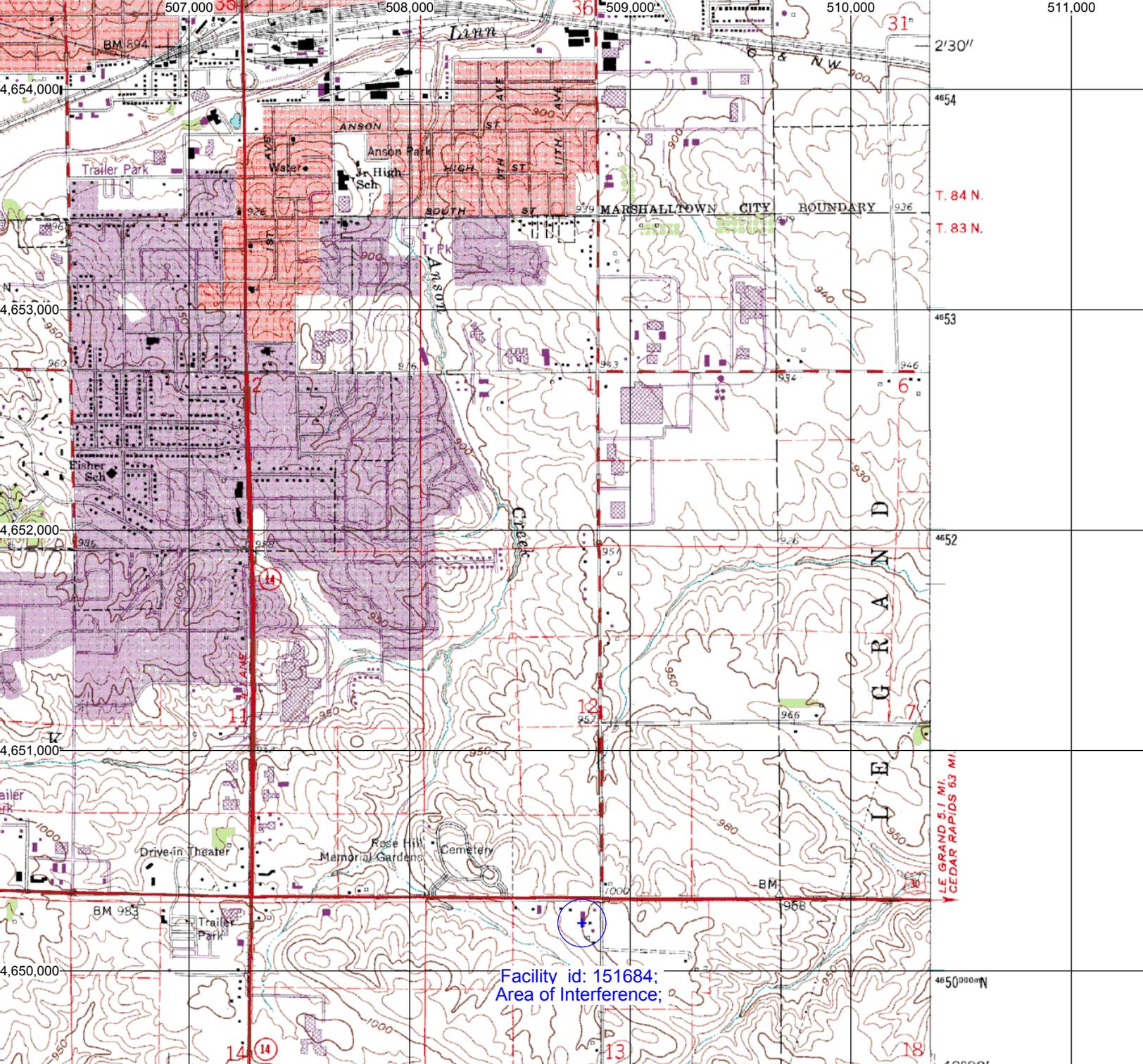
Polarization: Circular

ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB					
5.00	0.997	-0.03	-6.75	0.994	-0.05	-27.00	0.905	-0.87	-50.50	0.682	-3.33	-74.00	0.367	-8.71
4.75	0.997	-0.03	-7.00	0.993	-0.06	-27.50	0.901	-0.90	-51.00	0.676	-3.40	-74.50	0.360	-8.88
4.50	0.997	-0.02	-7.25	0.993	-0.06	-28.00	0.898	-0.94	-51.50	0.670	-3.48	-75.00	0.352	-9.06
4.25	0.998	-0.02	-7.50	0.993	-0.07	-28.50	0.894	-0.97	-52.00	0.664	-3.56	-75.50	0.345	-9.25
4.00	0.998	-0.02	-7.75	0.992	-0.07	-29.00	0.890	-1.01	-52.50	0.658	-3.63	-76.00	0.337	-9.44
3.75	0.998	-0.02	-8.00	0.991	-0.07	-29.50	0.887	-1.04	-53.00	0.652	-3.72	-76.50	0.330	-9.63
3.50	0.998	-0.01	-8.25	0.991	-0.08	-30.00	0.883	-1.08	-53.50	0.646	-3.80	-77.00	0.323	-9.83
3.25	0.999	-0.01	-8.50	0.990	-0.08	-30.50	0.879	-1.12	-54.00	0.640	-3.88	-77.50	0.315	-10.03
3.00	0.999	-0.01	-8.75	0.990	-0.09	-31.00	0.875	-1.16	-54.50	0.634	-3.96	-78.00	0.308	-10.24
2.75	0.999	-0.01	-9.00	0.989	-0.09	-31.50	0.871	-1.20	-55.00	0.627	-4.05	-78.50	0.300	-10.45
2.50	0.999	-0.01	-9.25	0.989	-0.10	-32.00	0.867	-1.24	-55.50	0.621	-4.14	-79.00	0.293	-10.67
2.25	0.999	-0.01	-9.50	0.988	-0.10	-32.50	0.863	-1.28	-56.00	0.615	-4.23	-79.50	0.285	-10.89
2.00	0.999	0.00	-9.75	0.987	-0.11	-33.00	0.859	-1.32	-56.50	0.608	-4.32	-80.00	0.278	-11.13
1.75	1.000	0.00	-10.00	0.987	-0.12	-33.50	0.855	-1.36	-57.00	0.602	-4.41	-80.50	0.270	-11.36
1.50	1.000	0.00	-10.50	0.985	-0.13	-34.00	0.851	-1.41	-57.50	0.596	-4.50	-81.00	0.263	-11.61
1.25	1.000	0.00	-11.00	0.984	-0.14	-34.50	0.846	-1.45	-58.00	0.589	-4.60	-81.50	0.255	-11.86
1.00	1.000	0.00	-11.50	0.982	-0.15	-35.00	0.842	-1.49	-58.50	0.583	-4.69	-82.00	0.248	-12.12
0.75	1.000	0.00	-12.00	0.981	-0.17	-35.50	0.838	-1.54	-59.00	0.576	-4.79	-82.50	0.240	-12.39
0.50	1.000	0.00	-12.50	0.979	-0.18	-36.00	0.833	-1.59	-59.50	0.570	-4.89	-83.00	0.233	-12.67
0.25	1.000	0.00	-13.00	0.978	-0.20	-36.50	0.829	-1.63	-60.00	0.563	-4.99	-83.50	0.225	-12.96
0.00	1.000	0.00	-13.50	0.976	-0.21	-37.00	0.824	-1.68	-60.50	0.556	-5.09	-84.00	0.217	-13.26
-0.25	1.000	0.00	-14.00	0.974	-0.23	-37.50	0.819	-1.73	-61.00	0.550	-5.20	-84.50	0.210	-13.57
-0.50	1.000	0.00	-14.50	0.972	-0.25	-38.00	0.815	-1.78	-61.50	0.543	-5.30	-85.00	0.202	-13.89
-0.75	1.000	0.00	-15.00	0.970	-0.26	-38.50	0.810	-1.83	-62.00	0.536	-5.41	-85.50	0.195	-14.22
-1.00	1.000	0.00	-15.50	0.968	-0.28	-39.00	0.805	-1.88	-62.50	0.530	-5.52	-86.00	0.187	-14.56
-1.25	1.000	0.00	-16.00	0.966	-0.30	-39.50	0.800	-1.93	-63.00	0.523	-5.63	-86.50	0.179	-14.93
-1.50	1.000	0.00	-16.50	0.964	-0.32	-40.00	0.796	-1.99	-63.50	0.516	-5.75	-87.00	0.172	-15.30
-1.75	1.000	0.00	-17.00	0.962	-0.34	-40.50	0.791	-2.04	-64.00	0.509	-5.86	-87.50	0.164	-15.70
-2.00	0.999	0.00	-17.50	0.960	-0.36	-41.00	0.786	-2.10	-64.50	0.502	-5.98	-88.00	0.156	-16.11
-2.25	0.999	-0.01	-18.00	0.957	-0.38	-41.50	0.781	-2.15	-65.00	0.495	-6.10	-88.50	0.149	-16.54
-2.50	0.999	-0.01	-18.50	0.955	-0.40	-42.00	0.776	-2.21	-65.50	0.488	-6.22	-89.00	0.141	-17.00
-2.75	0.999	-0.01	-19.00	0.952	-0.42	-42.50	0.770	-2.27	-66.00	0.481	-6.35	-89.50	0.134	-17.48
-3.00	0.999	-0.01	-19.50	0.950	-0.45	-43.00	0.765	-2.32	-66.50	0.475	-6.48	-90.00	0.126	-17.99
-3.25	0.999	-0.01	-20.00	0.947	-0.47	-43.50	0.760	-2.38	-67.00	0.467	-6.60			
-3.50	0.998	-0.01	-20.50	0.945	-0.49	-44.00	0.755	-2.44	-67.50	0.460	-6.74			
-3.75	0.998	-0.02	-21.00	0.942	-0.52	-44.50	0.749	-2.51	-68.00	0.453	-6.87			
-4.00	0.998	-0.02	-21.50	0.939	-0.54	-45.00	0.744	-2.57	-68.50	0.446	-7.01			
-4.25	0.998	-0.02	-22.00	0.936	-0.57	-45.50	0.739	-2.63	-69.00	0.439	-7.15			
-4.50	0.997	-0.02	-22.50	0.933	-0.60	-46.00	0.733	-2.70	-69.50	0.432	-7.29			
-4.75	0.997	-0.03	-23.00	0.931	-0.63	-46.50	0.728	-2.76	-70.00	0.425	-7.43			
-5.00	0.997	-0.03	-23.50	0.928	-0.65	-47.00	0.722	-2.83	-70.50	0.418	-7.58			
-5.25	0.996	-0.03	-24.00	0.924	-0.68	-47.50	0.716	-2.90	-71.00	0.411	-7.73			
-5.50	0.996	-0.04	-24.50	0.921	-0.71	-48.00	0.711	-2.96	-71.50	0.403	-7.89			
-5.75	0.996	-0.04	-25.00	0.918	-0.74	-48.50	0.705	-3.03	-72.00	0.396	-8.04			
-6.00	0.995	-0.04	-25.50	0.915	-0.77	-49.00	0.699	-3.11	-72.50	0.389	-8.21			
-6.25	0.995	-0.05	-26.00	0.912	-0.80	-49.50	0.694	-3.18	-73.00	0.382	-8.37			
-6.50	0.994	-0.05	-26.50	0.908	-0.84	-50.00	0.688	-3.25	-73.50	0.374	-8.54			

**Adjacent Channel Study
For Station K279AN, Facility_id: 151684**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
191191	28882	BMLH	19931025KA	KAZR	SAGA COMMUNICATIONS OF IOWA, INC	C1	PELLA	IA	LIC	100	489	277	2	61.9	0.0149
644604	151522	BNPFT	20030317DEG	NEW	EDGEWATER BROADCASTING, INC.	D	AMES	IA	APP	0.092	439.1	279	0	55.7	0
637056	144645	BNPFT	20030314BEA	NEW	HOLCOMB INTERNATIONAL MINISTRIES	D	PELLA	IA	APP	0.115	384	280	1	68.4	0
644651	151569	BNPFT	20030317DFM	NEW	EDGEWATER BROADCASTING, INC.	D	KNOXVILLE	IA	APP	0.14	369.5	279	0	76.5	0
1084092	165357	BSFH	20050812ASB	NEW	CUMULUS LICENSING LLC	A	DUNKERTON	IA	APP	0	0	280	1	80.4	0
96415	7823	BLH	19861229KC	KLTI-FM	SAGA COMMUNIC. OF IA, INC.	C	AMES	IA	LIC	100	615	281	2	84.3	0
1118986	166072	BNPH	20060308AJJ	KCOO	ACE RADIO CORPORATION	A	DUNKERTON	IA	CP	6	404	280	1	95.7	0



Facility id: 151684;
Area of Interference;

55' 507 LAUREL 8 MI. NEWTON 27 MI. INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1980 R. 18 W. R. 17 W. 510000E 92°52'30" (GILMAN) 1467 N NE

1 MILE
7000 FEET

ROAD CLASSIFICATION
 Heavy-duty ——— Light-duty ———
 Medium-duty - - - - - Unimproved dirt - - - - -
 U. S. Route (red shield) State Route (red circle)

IOWA
 QUADRANGLE LOCATION

MARSHALLTOWN, IOWA
 SW/4 MARSHALLTOWN 15' QUADRANGLE
 N 4200—W 9252.5/7.5
 1960
 PHOTOREVISED 1980
 DMA 7468 III SW—SERIES V876

Revisions shown in purple compiled from aerial photographs taken 1978. Map edited 1980
 This information not field checked
 Purple tint indicates extension of urban area