

EXHIBIT 12

FM OVERLAP REQUIREMENTS

This application uses identical parameters to those specified in the previously submitted “short form”.

This application meets all requirements of 47 CFR §74.1204 regarding interference protection to other existing stations, authorizations, and pending applications, as shown by **Exhibit 12a**. In each case the affected stations’ protected contours are shown, with the appropriate proposed translator interfering contour color coded to match the appropriate affected stations.

Interference protection is provided to 3rd-adjacent station WXMG, ch255, Upper Arlington, OH, and to 2nd-adjacent station WNCI, ch250, Columbus, OH, using the provisions of §74.1204(d). WXMG has 98.0dBu F(50/50) of signal strength at the proposed translator site. Using the appropriate U/D ratio of 40dBu for 2nd and 3rd-adjacent stations, the interfering contour of the proposed translator becomes 138.0dBu f(50/10), which extends to a radius of 12 meters. Meanwhile, WNCI has a signal strength of 110.5dBu at the translator site, with a corresponding translator interfering contour of 150.5dBu, which would extend to a radius of 3m. With an antenna radiation center of 22 meters, the translator interfering contour with respect to both stations would not even reach the ground. Clearly, there would be no contour overlap with these stations over populated areas, and no interference to the reception of any station is expected to occur. If a waiver of §74.1204 is required in this case, it is hereby respectfully requested.

This proposal is in the Canadian zone. The 34dBu f(50/10) contour does not cross the border. No Canadian processing will be required.

BROWN BROADCAST SERVICES
I N C O R P O R A T E D

Michael D. Brown

3740 S.W. Comus St.

Portland, Oregon 97219-7418

503-245-6065

Compliance with 74.1235(b)(2), regarding MERPs for each of the cardinal radials, is demonstrated below.

Radial	Radial HAAT (m)	ERP (w)	Maximum Allowable ERP (w)
0	7.6	170	250
30	-12.8	170	250
60	0.7	170	250
90	4.0	170	250
120	21.7	170	250
150	32.9	170	170
180	37.0	170	170
210	5.5	170	250
240	-12.6	170	250
270	-21.6	170	250
300	-10.4	170	250
330	-0.4	170	250

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Exhibit 12a - Contour Analysis

Brown Broadcast Services, Inc.
Job: 08-1 MARBLE CLIFF 252 LONG FORM FINAL.fmj
Master Database: 2003_Aug_22.fmd
Lat: N39:59:37 Lon: W083:02:09 NAD-27
Scale: 1:750000
Channel: 252 Class: DX
Status: Licensed, Construction Permit, Application, Addition
Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj
Range: 91 km, Clearance: -0.5km
Comments: No Comments
Description:

rfInvestigator-FM Version 2.0.78
by rfSoftware, Inc.
Date: 8/24/2003 1:11:38 AM
Key:

Service
Protected
Co-Channel
1st Adj
2nd/3rd Adj

