

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 150318

Channel 286

### **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 $\mu$  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.

## 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>
19948	BLH19800505AB	WQHQ	82.1	82.1
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>82.1</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 **82.1 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **122.1 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **31.6 m** from the transmit antenna.

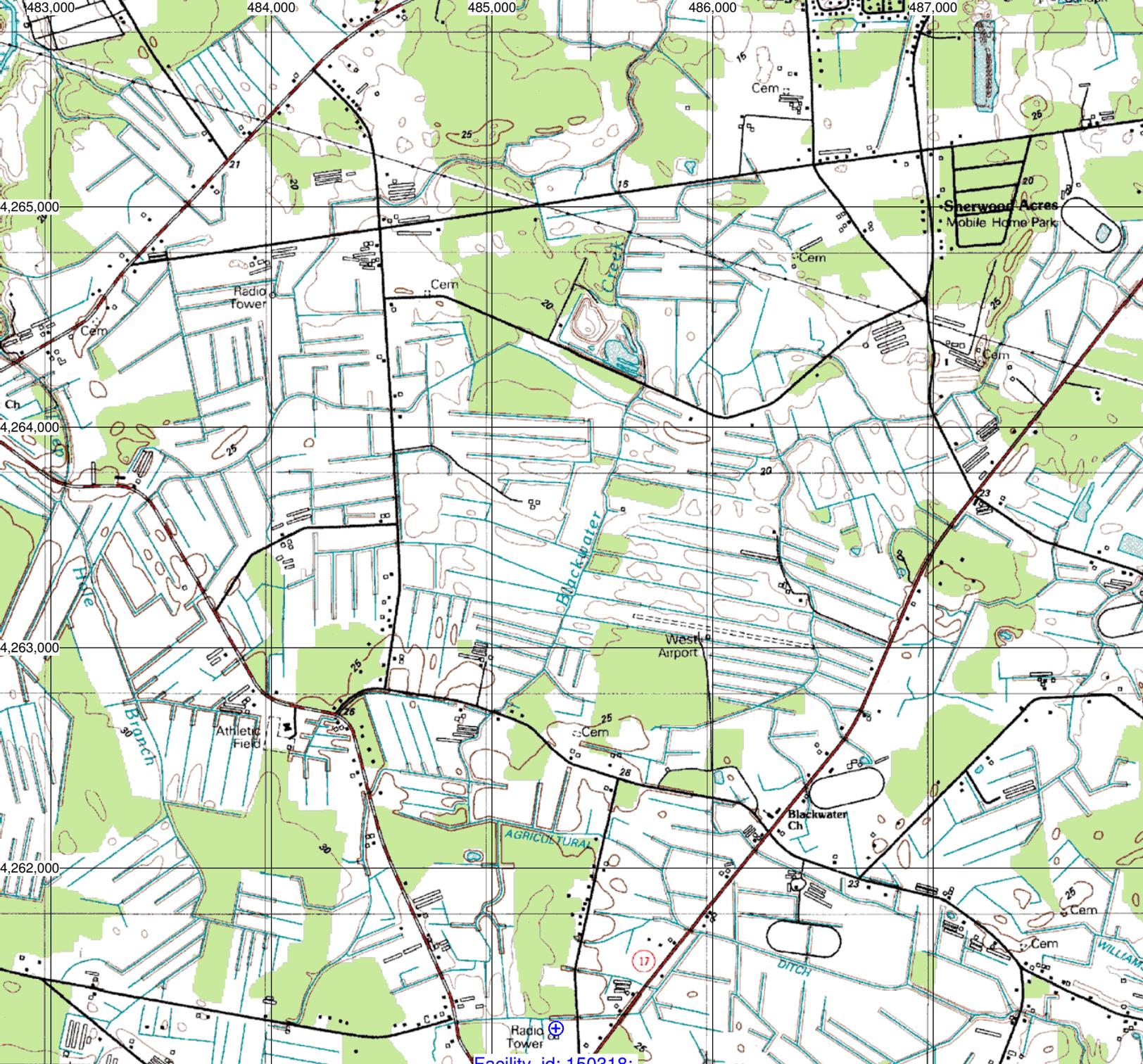
The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section 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.

**Antenna Manufacturer:** PSI  
**Antenna Model:** FML  
**CORAGL:** 70 m  
**Maximum ERP:** 0.033 kW  
**Interfering Contour:** 122.1 dB $\mu$   
**Max Int. Contour Distance:** 31.6 m

**Adjacent Channel Study  
For Station W286BB, Facility\_id: 150318**

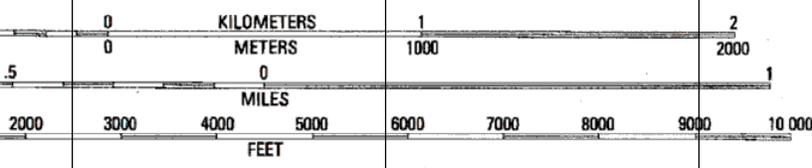
**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
19948	28166	BLH	19800505AB	WQHQ	CUMULUS LICENSING CORP.	B	OCEAN CITY-SALISBUR	MD	LIC	33	189	284	2	16.7	0.784
1090991	150322	BMPFT	20051122ACP	W286AX	PRIORITY RADIO, INC.	D	SALISBURY	MD	CP MOD	0.03	76	286	0	27.4	0
681935	150268	BNPFT	20030826AHM	W286AS	EDGEWATER BROADCASTING, INC.	D	GEORGETOWN	DE	CP	0.019	115	286	0	30.8	0
100442	28167	BLH	19870413KK	WDKZ	CUMULUS LICENSING CORP.	A	SALISBURY	MD	LIC	2.1	130	288	2	38.9	0
143856	40031	BMLH	19900117KE	WGBZ	MARGATE COMMUNICATIONS LIMITED PTNP	A	CAPE MAY COURT HOU	NJ	LIC	3.3	93	288	2	75.6	0
633088	141493	BNPFT	20030311ACN	NEW	EDWARD A. SCHOBERT	D	RIO GRANDE	NJ	APP	0.038	82	283	3	83	0
163328	57357	BLH	19910726KB	WSJO	MEGA COMMUNICATIONS OF EGG HARBOR LI	B1	EGG HARBOR CITY	NJ	LIC	10	167	285	1	124.9	0



Facility id: 150318;  
 Area of Interference;  
 SELBYVILLE 4 MI.

SCALE 1:24 000



CONTOUR INTERVAL 5 FEET  
 NATIONAL GEODETIC VERTICAL DATUM OF 1929  
 SOUNDINGS IN FEET-DATUM IS MEAN LOW WATER  
 THE RELATIONSHIP BETWEEN THE TWO DATUMS IS VARIABLE  
 4,260,000 REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER  
 THE MEAN RANGE OF TIDE IS APPROXIMATELY 0.9 FEET

COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
 FOR SALE BY U. S. GEOLOGICAL SURVEY  
 FEDERAL CENTER, COLORADO 80225, OR RESTON, VIRGINIA 22092  
 ADDITIONAL TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

ROAD CLASSIFICATION  
 Primary highway, hard surface .....  
 Secondary highway, hard surface .....  
 Interstate Route



QUADRANGLE LOCATION

Revisions compiled in cooperation with State of Delaware agencies from aerial photographs taken 1989 and other sources  
 Contours not revised. This information not field checked. Map edited 1991

75.1683



38.5017

38.5017