

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 146197

Channel 240

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.

Note: The quadrangle indicates the presence of a county road in the area of interference. It is apparent that this is not a major road, e.g. interstate highway, as described in the Living Way decision and therefore "lack of population" is demonstrated.

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 μ 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
1039577	BPH20030327AEH	KSWG	69.9	69.5
214101	BMLH19950925KC	KYOT-FM	76.1	75.6
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				69.5

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 **69.5 dB μ** , this makes the proposed translator's worst-case interfering contour **109.5 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **332.3 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 quadrangle indicates the presence of a county road in the area of interference. It is apparent that this is not a major road, e.g. interstate highway, as described in the Living Way decision and therefore "lack of population" is demonstrated.

Antenna Manufacturer: SCA
Antenna Model: FMV
CORAGL: 7 m
Maximum ERP: 0.2 kW
Interfering Contour: 109.5 dB μ
Max Int. Contour Distance: 332.3 m

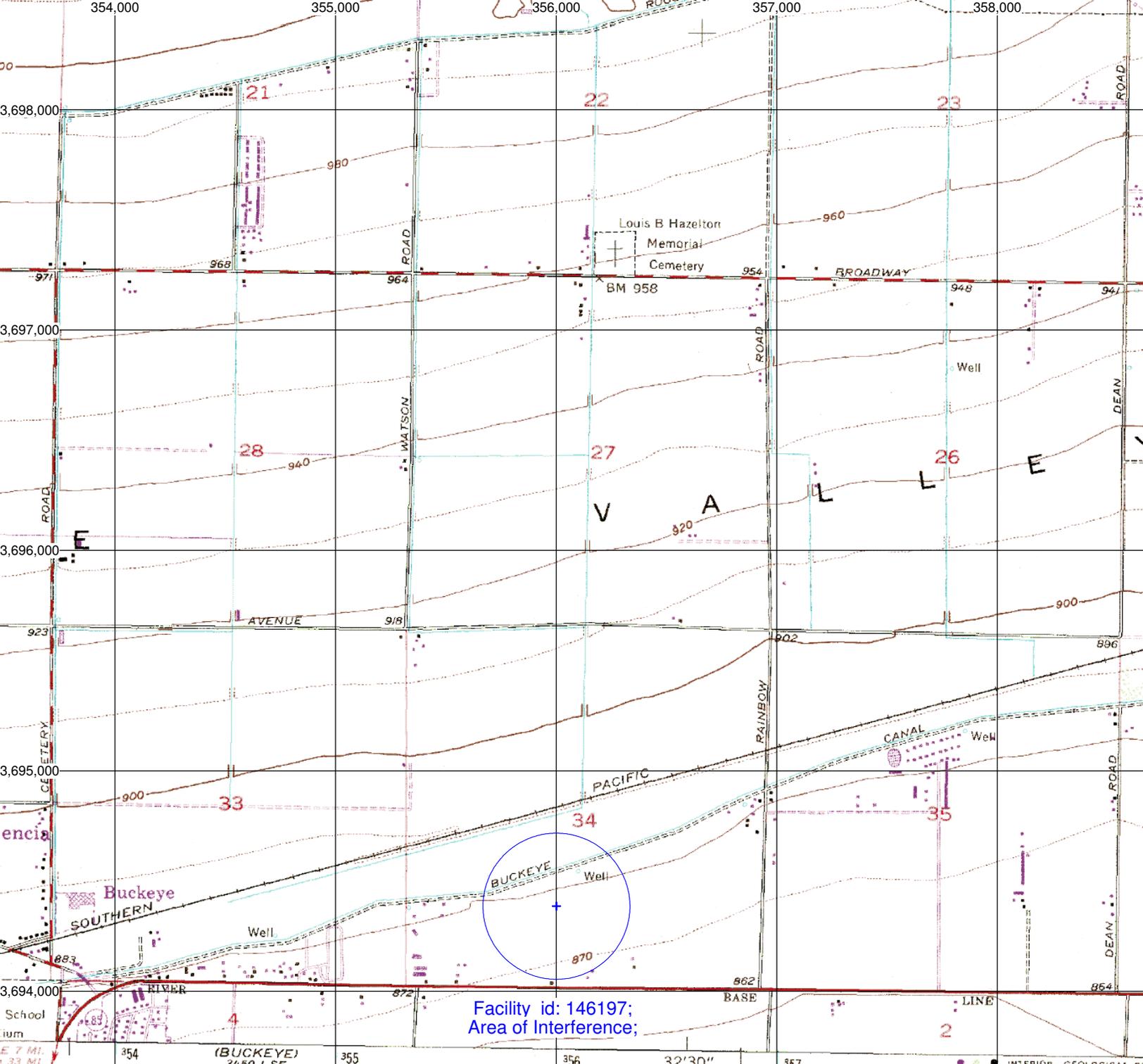
**Adjacent Channel Study
For Station K240DC, Facility_id: 146197**

Co-channel through third adjacent:

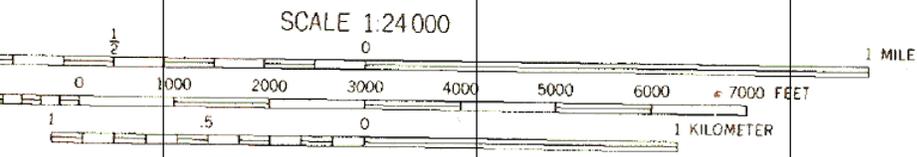
Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
214101	18648	BMLH	19950925KC	KYOT-FM	CHANCELLOR MEDIA LICENSEE COMPANY	C	PHOENIX	AZ	LIC	96	838	238	2	45.5	1.1935
1039577	11216	BPH	20030327AEH	KSWG	CIRCLE S BROADCASTING CO., INC.	C	WICKENBURG	AZ	CP	100	1359	242	2	70.3	1.1935
639282	146692	BNPFT	20030317CFH	NEW	RADIO ASSIST MINISTRY, INC.	D	PHOENIX	AZ	APP	0.25	475.5	243	3	63.2	0
1002420	11216	BLH	20020311ABB	KSWG	CIRCLE S BROADCASTING CO., INC.	C3	WICKENBURG	AZ	LIC	6.4	943	242	2	64.8	0
641045	148240	BNPFT	20030317EJU	NEW	EDUCATIONAL MEDIA FOUNDATION	D	MESA	AZ	APP	0.019	797	243	3	85.2	0
1169015	11216	BMPH	20070119AID	KSWG	CIRCLE S BROADCASTING CO., INC.	C	WICKENBURG	AZ	APP	41	2385	242	2	96.4	0
1155177	51642	BLH	20061020ABZ	KKLD	YAVAPAI BROADCASTING CORPORATION	C0	COTTONWOOD	AZ	LIC	21	2388	240	0	150.5	0

Intermediate Frequencies (53 and 54 channels difference):

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Clr
1118111	2740	BPH	20000323ACA	KKMR	UNIVISION RADIO LICENSE CORPORATION	C3	ARIZONA CITY	AZ	APP	8.6	616	293	53	85.1	73.1



Facility id: 146197;
Area of Interference;



CONTOUR INTERVAL 20 FEET
DASHED LINES REPRESENT HALF INTERVAL CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
ORDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST



QUADRANGLE LOCATION