

Exhibit 12

Non-Interference Compliance

Channel: 257

Reference to: FCC File Number: BLFT-20091119ACX Licensed Translator W257CP, Berlin, NH, Facility id 155261) This Application proposes a site modification to the existing Tower of the Primary Station, WKDR-AM, Berlin, New Hampshire.

Description of Exhibit 12 Contents

This exhibit will show that the proposed facility complies with contour overlap interference protection provisions in 47 CFR 74.1204.

Specifically we will show compliance because the Proposed ch. 257 Translator is fully spaced with all domestic and international stations, applications, and allotments.

The applicant certifies that should any actual interference occur, operation of the translator will be suspended in accordance with 47 CFR 74.1203.

Page 3, Exhibit 12(a), displays the F(50/50) 60 dbu of the proposed channel 257 Translator overlapping the F(50/50) 60 dbu of the original W257CP Licensed Facilities, thus compliance with CFR, 74.1233(a) (2).

Please note that the Primary Station is (WKDR-AM), Berlin, NH. Received Via Internet.

Page 3, Exhibit 12(a) Shows that the F(50,50 60 dBu Contour of the Proposed Ch. 257 Translator, does not exceed the 2 mVm Daytime Contour of Primary Station WKDR-AM. (72 Radial Points were used in this portion of the study)

Page 4, Exhibit 12(b) Since the proposed channel 257 translator is about 64.3 kilometers from the Canadian Border, the applicant certifies that the 50/10, 34 dbu contour does not extend beyond the U.S. Border, and hence is in compliance with 47 CFR 74.1204(h). (see page 6, Exhibit 12(d) & Page 4, Exhibit 12 (b))

Page 5, Exhibit 12(c), is a Table showing the distance to the F (50/50) 60 dbu contour of the Proposed 99.3 Translator, prepared using ComStudy 2.2. *(Also note the HAAT Column of this Exhibit for Reference)

Page 6, Exhibit 12(d), is a Table showing the distance to the Proposed ch. 257 Translator's F(50,10) 34 dBu Interfering Contour.

Page 7, Exhibit 12(e), is a Topographical map of the area around the proposed channel 257 translator site.

Cont...

The Proposed channel 257 (99.3) Translator is to be constructed on an existing Nondirectional AM tower site. The applicant certifies that it will fully comply with CFR Sec. 74.1237 (e) and Sec. 73.1692 (a), which states that “installations on an AM nondirectional tower, during installation of the broadcast antenna and related equipment, the AM station shall determine operating power by the indirect method. Upon completion of the installation, antenna Impedance measurements on the AM antenna shall be made, and, prior to, or simultaneously with the filing of the license application covering the broadcast station installation, an application on FCC form 302-AM (including a tower sketch of the installation) shall be filed with the commission for the AM Station to return to direct power measurement.

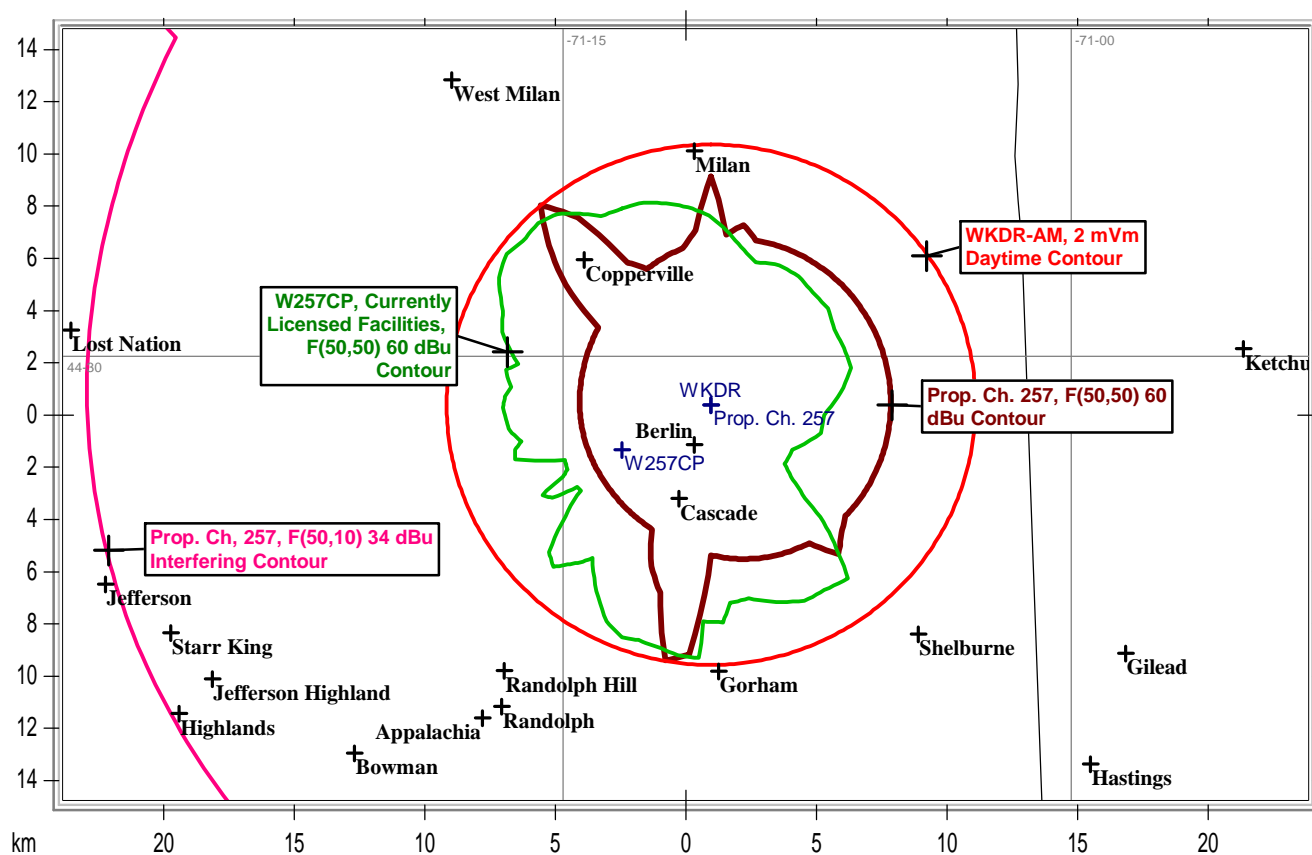
Explanation of ComStudy Frequency Finder Results:

The Interference analysis for the instant application was performed using data taken directly from the FCC’s FM database, which looks for prohibited overlap with contours of adjacent stations, and prohibited proximity to stations 53 or 54 channels from the proposed translator station (IF) using 3 arc second terrain data and the FCC’s contour algorithms. See results of analysis in Table on Page 8, Exhibit 12(f). (ComStudy uses the FCC’s FM Database, thus the results included the proposed translator’s currently licensed or applied for facilities. This line was deleted from the Table to save confusion) The results show the proposal is fully spaced to all domestic, and international stations, applications, and allotments.

The proposed channel 257 Translator can operate with an effective radiated power of 240-watts at 13 meters AGL. . (see page 3, Exhibit 12(a) Contour Study) (For reference HAAT on the 12 required radials, see page 3, Exhibit 12 (a) and note the HAAT column)

The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). (See page 9, Exhibit 12(g), FM Model)
Note: The Scala Model FMV-1 Antenna to be used, is Vertically Polarized.

Prop. F(50,50) 60 dBu Contour Overlaps Currently Licensed 60 dBu



F(50,10) 34 dBu Interfering Contour does not Cross Canadian Border.

State Borders Lat/Lon Grid

F(50,10) 34 dBu Interfering Contour does not Cross Canadian Border.

Map Scale: 1:1157760 1 cm = 11.58 km V/H Size: 118.15 x 190.78 km

Prop. Ch. 257 Berlin NH
Distance to 60 dBu Contour

Site: Prop. Ch. 257
Coordinate 44-28-58.0 N, 71-10-38.0 W
Freq: 99.30000 MHz
ERP: 240 W 13 Meters AGL

<u>Bearing</u>	<u>ERP W</u>	<u>HAAT</u>	<u>DH</u>	<u>Distance</u>	<u>Lat</u>	<u>Lon</u>
0	175.82	57	340	9.05	44.56418	-71.1772
30	221.6	-4	160	8.98	44.56352	-71.1752
60	237.56	-66	740	8.91	44.56283	-71.1733
90	238.99	-216	690	8.83	44.56213	-71.1714
120	226.7	-80	280	8.76	44.5614	-71.1695
150	187.09	-28	590	8.69	44.56063	-71.1677
180	125.43	25	1070	8.62	44.55986	-71.1659
210	82.4	-2	1000	8.54	44.55906	-71.1641
240	69.45	-228	300	8.47	44.55825	-71.1623
270	68.94	-61	430	8.4	44.55741	-71.1606
300	77.96	-17	340	8.33	44.55654	-71.159
330	113.91	38	320	8.26	44.55567	-71.1573

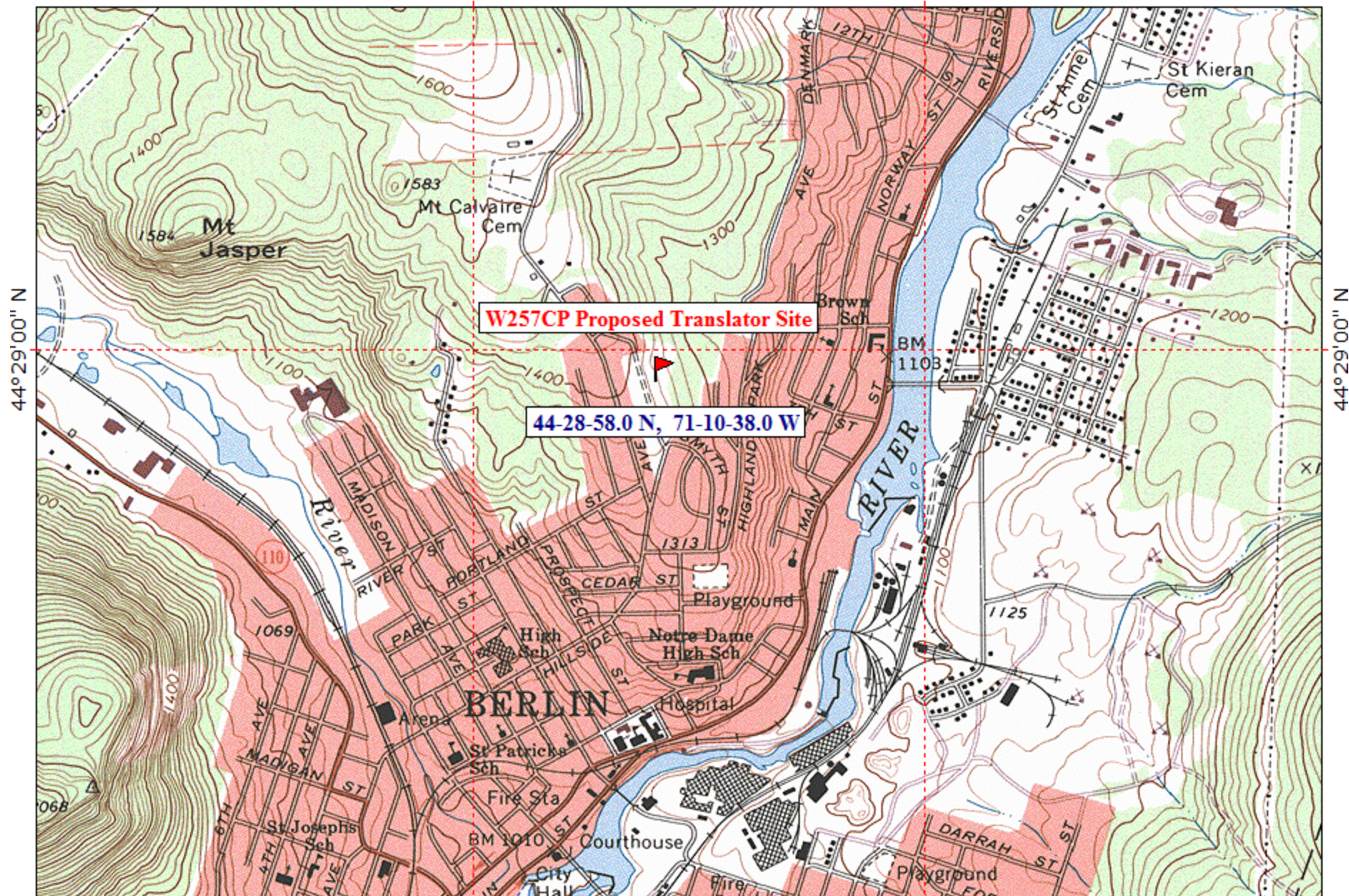
Prop. Ch. 257 Berlin NH
Distance to 34 dBu Contour

Site: Prop. Ch. 257
Coordinate: 44-28-58.0 N, 71-10-38.0 W
Freq: 99.30000 MHz
ERP: 240 W 13 Meters AGL

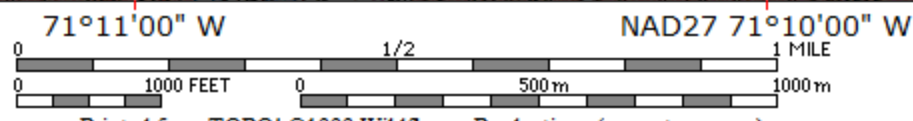
<u>Bearing</u>	<u>ERP W</u>	<u>HAAT</u>	<u>DH</u>	<u>Distance</u>	<u>Lat</u>	<u>Lon</u>
0	175.82	57	340	44.81	44.88586	-71.1772
5	185.4	32	220	42.53	44.86523	-71.1678
10	194.79	36	220	40.24	44.84448	-71.1594
15	202.65	24	200	37.95	44.82366	-71.152
20	209.77	-1	170	35.66	44.80276	-71.1457
25	216.1	-10	210	33.38	44.78182	-71.1404
30	221.6	-4	160	33.92	44.78622	-71.1323
35	225.77	-6	190	34.47	44.79052	-71.124
40	229.51	-16	250	35.02	44.79471	-71.1154
45	232.33	-27	390	35.57	44.79877	-71.1067
50	235.18	-33	310	36.12	44.80271	-71.0977
55	236.6	-34	490	35.55	44.79663	-71.0912
60	237.56	-66	740	34.98	44.79049	-71.085
65	238.99	-86	550	34.41	44.78429	-71.0791
70	239.47	-103	570	33.84	44.77804	-71.0735
75	239.95	-140	520	33.27	44.77175	-71.0681
80	239.95	-166	590	33.34	44.77099	-71.0608
85	239.47	-212	540	33.41	44.77013	-71.0534
90	238.99	-216	690	33.49	44.76918	-71.0461
95	238.04	-203	560	33.56	44.76814	-71.0388
100	236.6	-214	630	33.64	44.767	-71.0315
105	235.18	-179	590	33.7	44.76568	-71.0242
110	232.81	-109	410	33.77	44.76427	-71.017
115	229.98	-116	280	33.83	44.76276	-71.0098
120	226.7	-80	280	33.9	44.76115	-71.0026

120	226.7	-80	280	33.9	44.76115	-71.0026
125	222.52	-40	350	33.96	44.75946	-70.9954
130	217.47	-2	360	34.01	44.75759	-70.9884
135	211.12	34	270	34.07	44.75563	-70.9813
140	204.42	40	470	34.12	44.75357	-70.9743
145	196.09	23	460	34.17	44.75143	-70.9674
150	187.09	-28	590	34.23	44.74921	-70.9605
155	177.88	-84	590	34.27	44.74677	-70.9537
160	167.7	-126	640	34.31	44.74425	-70.947
165	156.66	-140	810	34.35	44.74165	-70.9403
170	146.36	-142	480	34.39	44.73896	-70.9337
175	135.69	-38	860	34.43	44.73619	-70.9272
180	125.43	25	1070	34.47	44.73329	-70.9207
185	115.9	86	680	34.5	44.73031	-70.9143

TOPO! map printed on 12/13/09 from "WHITE.MN.TPO" and "Untitled.tpg"
71°11'00" W NAD27 71°10'00" W



MN
17°



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Prop. Ch. 257 Berlin, NH
Frequency Separation Study

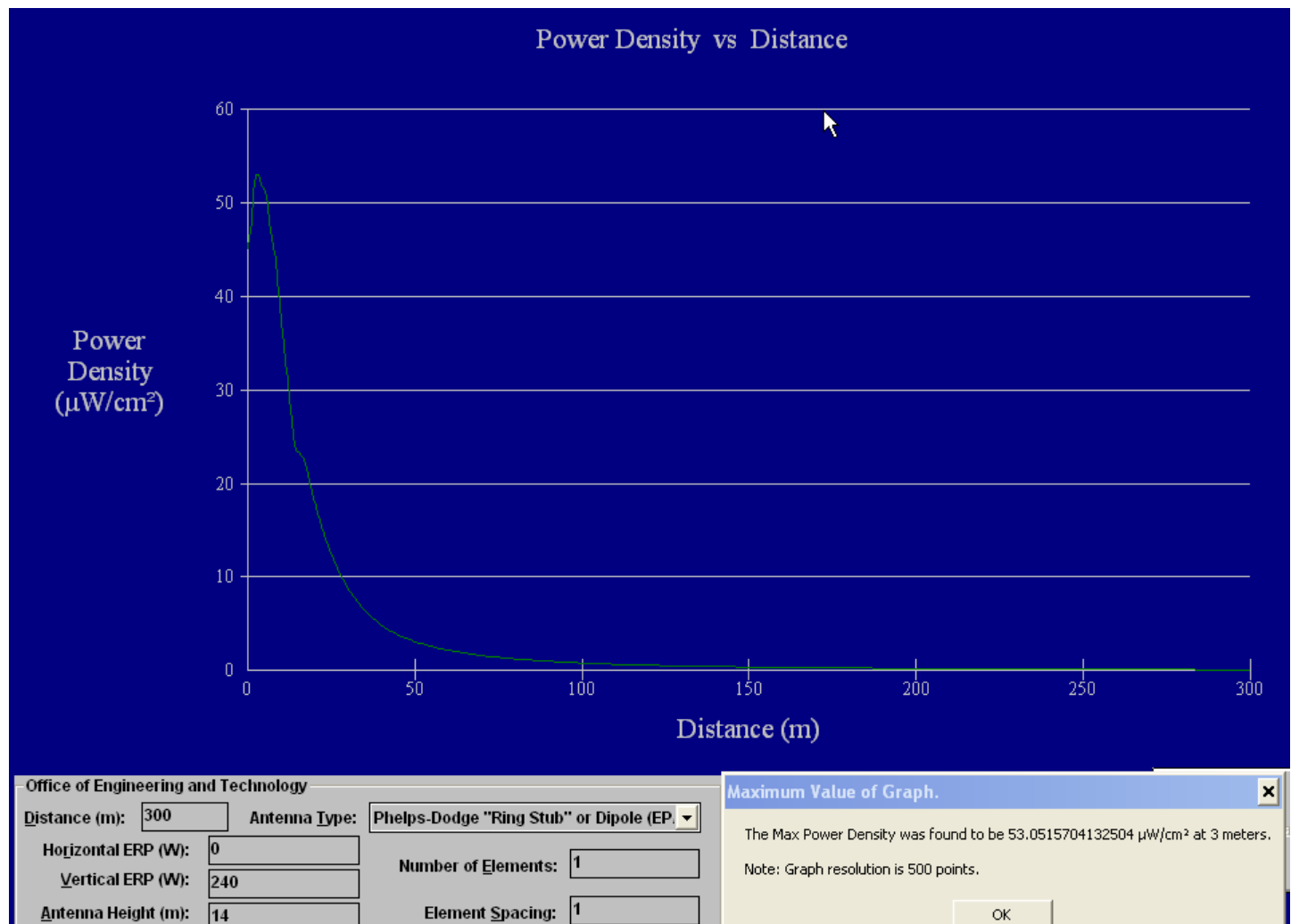
Page 8.
Exhibit 12(f)

44-28-58.0 N, 71-10-38.0 W
240 Watts @ 13 Meters AGL

<u>Callsign</u>	<u>State</u>	<u>City</u>	<u>Freq</u>	<u>Channel</u>	<u>ERP_w</u>	<u>Class</u>	<u>Status</u>	<u>Distance_kn</u>	<u>Sep</u>	<u>Clr</u>
	QU	WINDSOR	99.3	257	0	A		136.8	0	29.92 dB
850712GK	ME	KENNEBUNK	99.3	257	0	A	USE	135.66	0	27.31 dB
871029MI	NH	JACKSON	99.5	258	0	A	USE	31.58	0	15.58 dB
CJAN-FM	QC	ASBESTOS	99.3	257	11100	B1		153.37	0	27.13 dB
NEW	ME	BRUNSWICK	99.5	258	10	D	APP	112.82	0	34.46 dB
NEW	ME	LEWISTON	99.5	258	13	D	APP	94.19	0	31.34 dB
NEW	ME	OLD TOWN	99.3	257	250	D	APP	205.81	0	36.97 dB
NEW	VT	BARRE	99.5	258	10	D	APP	119.39	0	39.66 dB
NEW	VT	MONTPELIER	99.3	257	250	D	APP	113.71	0	22.02 dB
W257AU	VT	ST. JOHNSBURY, ETC.	99.3	257	5	D	LIC	63.64	0	16.77 dB
W257BI	ME	CAMDEN	99.3	257	250	D	LIC	170.75	0	31.61 dB
W258AZ	VT	NEWBURY	99.5	258	10	D	LIC	90.52	0	35.46 dB
WBQQ	ME	KENNEBUNK	99.3	257	3000	A	LIC	133.72	0	23.04 dB
WBTZ	NY	PLATTSBURGH	99.9	260	100000	C	LIC	195.97	0	35.31 dB
WCLZ	ME	NORTH YARMOUTH	98.9	255	48000	B	LIC	112.82	0	20.43 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	203.22	0	34.11 dB
WCRB	MA	LOWELL	99.5	258	27000	B	LIC	203.22	0	34.11 dB
WCRB	MA	LOWELL	99.5	258	37000	B	LIC	203.22	0	33.28 dB
WEVJ	NH	JACKSON	99.5	258	4700	A	LIC	34.21	0	4.79 dB
WFRD	NH	HANOVER	99.3	257	0	A	USE	128.48	0	29.28 dB
WFRD	NH	HANOVER	99.3	257	6000	A	LIC	128.49	0	23.44 dB
WKTJ-FM	ME	FARMINGTON	99.3	257	0	A	USE	80.24	0	16.14 dB
WKTJ-FM	ME	FARMINGTON	99.3	257	1500	A	LIC	80.24	0	12.39 dB
WNNH	NH	HENNIKER	99.1	256	2800	A	LIC	146.89	0	38.76 dB
WNYN-FM	NH	WHITEFIELD	99.1	256	460	A	LIC	46.9	0	6.49 dB
WNYN-FM*	NH	WHITEFIELD	99.1	256	0	A	USE	27.98	0	21.69 dB
WOKO	VT	BURLINGTON	98.9	255	100000	C1	LIC	160.81	0	34.47 dB
WTHT	ME	AUBURN	99.9	260	28500	B	LIC	91.85	0	12.72 dB
WTTT	NH	BRETTON WOODS	98.7	254	0	A	RSV	28.04	0	27.35 dB
WTTT	NH	BRETTON WOODS	98.7	254	40	A	APP	25.66	0	2.37 dB
WTTT	NH	STRATFORD	98.7	254	143	A	CP	39.71	0	7.73 dB
WTTT*	NH	STRATFORD	98.7	254	0	A	USE	41.65	0	18.92 dB

EXHIBIT 16 ENVIRONMENTAL IMPACT

The Applicant proposes to mount it's antenna with the center of radiation at 13 meters above ground level. Figure 1. below, shows the maximum power density produced by the proposed facility at a point 3.1 meters above ground is 53.015 uW/cm2, 26.5 percent of the 200 uW/cm2 ANSI limit for uncontrolled general population exposure. Therefore, this proposal complies with ANSI standards.



Please Note: The Phelps Dodge "Ring Stub" Antenna Model was Employed to return a worst case result.

Actual Antenna to be used for W257CP is a Scala FMV-1, with Vertical Polarization.