

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317LCX

Channel: 251

Description of Exhibit 12 Contents

This exhibit demonstrates that the proposed facility complies with contour overlap and interference protection provisions in all the applicable rule sections and that this application for a construction permit is in full compliance with 47 CFR 74.1204.

Page 2 of this exhibit is an explanation of the tabulated data, which is included as evidence on page 3 of this exhibit.

Page 3 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application must consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

Let it be noted that should any actual real world interference occur, the applicant certifies that it will promptly suspend operation of this translator in accordance with 47 CFR 74.1203.

Explanation of Frequency Finder Results

The interference analysis for this application was performed using the "Frequency Finder" module in RadioSoft's Comstudy, version 2.2.

Frequency Finder analyzes data taken directly from the FCC's FM database and looks for prohibited overlap with contours of adjacent stations and prohibited proximity to stations 53 or 54 channels from the proposed station (IF) using 3 arc second terrain data and the FCC's contour algorithms. The results tabulated are the stations returned from that analysis. (Note: Because Comstudy was looking at the FCC's FM database, it took into account the proposed translator when doing the analysis and returned it in the tabulated results. For the sake of simplicity, that record has been deleted from all tabulated results.)

The first several columns of the table are self-explanatory. They give various data on the stations in question. The column labeled "Clr" gives the proposed translator's "clearance" with respect to the tabulated station, either in dB or km. The values listed with no units are given in km and are for stations located on an IF to the proposed site's channel.

A negative value in the "Clr" column does NOT necessarily represent prohibited contour overlap as explained below.

A negative value listed in the "Clr" column would indicate either overlap of interference and protected contours or prohibited proximity to an IF station except in the following situations:

- Since the proposed station's Effective Radiated Power (ERP) is 92 watts, a negative value in km (no units listed in the table) does not represent a violation of the CFR, according to 47 CFR 1204(g), which states that "FM translator stations and booster stations operating with less than 100 watts ERP will be treated as class D stations and will not be subject to intermediate frequency separation requirements."

- A second or third adjacent LP100 station cannot represent a violation of the CFR, as 47 CFR 74.1204(a)(4) requires protection of only co-channel and first adjacent LP100 stations.

- 47 CFR 74.1204(a) requires only the protection of "AUTHORIZED commercial or noncommercial educational FM broadcast stations, FM translators, ..." Any entry with a status listed as "RSV," "USE" or "APP" does not represent an authorized station and therefore is not protected under 47 CFR 74.1204. The one exception is the case of LP100 applications. The note to 47 CFR 74.1204(a)(4) states that "LPM applications and permits that have not yet been licensed must be considered as operating with the maximum permitted facilities." Therefore, any first adjacent or co-channel LP100 station, no matter the status, is protected.

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Cir	Facility_id
NEW	TX	CHILDRESS	251	75	RADIO ASSIST MINISTRY, INC.	BNPFT20030317MGL	D	APP	54.43	0.58 dB	154869
KTIJ	OK	ELK CITY	253	100000	FUCHS RADIO, LLC	BLH19990727KC	C	LIC	88.74	5.33 dB	70631
	TX	CROWELL	250	0		RM10303	C3	APP	27.91	7.35 dB	0
KJMZ	OK	LAWTON	251	100000	PERRY BROADCASTING OF LAWTON, INC.	BLH4928	C1	LIC	129.79	15.51 dB	35031
KRZB	TX	ARCHER CITY	248	50000	TEXAS GRACE COMMUNICATIONS	BMPH19990217IB	C2	CP	103.62	21.47 dB	79024
NEW	TX	VERNON	248	115	RADIO ASSIST MINISTRY, INC.	BNPFT20030317KYG	D	APP	40.47	21.86 dB	149517
NEW	TX	VERNON	248	1	RADIO ASSIST MINISTRY, INC.	BNPFT20030822AFF	D	APP	40.47	22.28 dB	149517
	OK	LAWTON	251	0		RMnj161	C1	APP	129.79	25.70 dB	0
KFQX-FM	TX	ANSON	251	50000	CUMULUS LICENSING CORP.	BLH19880414KB	C2	LIC	172.4	25.68 dB	53194
KJMZ	OK	LAWTON	251	0	PERRY BROADCASTING OF LAWTON, INC.		C1	USE	129.79	25.70 dB	35031
NEW	TX	CHILDRESS	249	75	RADIO ASSIST MINISTRY, INC.	BNPFT20030317MGX	D	APP	54.43	27.32 dB	154863
KHIM	OK	MANGUM	249	1500	ALTUS EDUCATIONAL BROADCASTING FOUNDATION	BLH20030423ABQ	A	LIC	69.68	30.65 dB	85874
	TX	GUTHRIE	252	0		RM10531	A	APP	86.71	31.10 dB	0
KKCL	TX	LORENZO	251	36000	CAPSTAR TX LIMITED PARTNERSHIP	BLH20001212AAM	C2	LIC	214.93	32.23 dB	1721
NEW	TX	OLNEY	252	205	RADIO ASSIST MINISTRY, INC.	BNPFT20030826ABZ	D	APP	128.44	35.25 dB	154950
NEW	TX	OLNEY	252	205	RADIO ASSIST MINISTRY, INC.	BNPFT20030317LEU	D	APP	128.44	35.25 dB	154950
	OK	CACHE	250	0		RMnj161	A	APP	113.46	36.65 dB	0
KGNC-FM	TX	AMARILLO	250	98000	MCC RADIO, LLC	BMLH19870116KA	C	LIC	232.43	37.46 dB	63161
KFQX-FM	TX	ANSON	251	0	CUMULUS LICENSING CORP.		C1	USE	196.04	37.69 dB	53194
KKCL	TX	LORENZO	251	0	CAPSTAR TX LIMITED PARTNERSHIP		C2	USE	200.25	39.32 dB	1721