

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 148362

Channel 260

### **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 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Page 4 includes a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 5 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 dBμ 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 6 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 7 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.

**Note: The USGS Quadrangle and the aerial photo show the presence of buildings within the zone of predicted interference. The tallest building in this zone is approximately 30ft tall. This application provides 141ft. (43.1m) of ground clearance which is more than adequate to provide the necessary clearance for these buildings, so 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.**

## 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 dBμ 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>
1117956	BMLH20060308ACZ	WOBB	69.9	69.9
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>69.9</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 **69.9 dBμ**, this makes the proposed translator's worst-case interfering contour **109.9 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **80.9 m** from the transmit antenna.

The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated on the following page at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free-space calculation that neglects any loss due to reflection, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the tower ground level (TGL) by **43.1 m** at the lowest point. The applicant has taken into account USGS quadrangles and relevant aerial photography in stating that no structures, except possibly tower support structures, puncture the area of interference. 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 USGS Quadrangle and the aerial photo show the presence of buildings within the zone of predicted interference. The tallest building in this zone is approximately 30ft tall. This application provides 141ft. (43.1m) of ground clearance which is more than adequate to provide the necessary clearance for these buildings, so 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:** NIC  
**Antenna Model:** BKG77  
**CORAGL:** 79 m  
**Maximum ERP:** 0.013 kW  
**Interfering Contour:** 109.9 dBμ  
**Max Int. Contour Distance:** 80.9 m  
**Min Ground Clearance:** 43.1 m

Depression Angle Below Horizontal	Antenna Relative Field	ERP (watts)	Distance to Interfering Contour from Antenna (m)	Horizontal Distance of Interfering Contour from Tower (m)	Vertical Clearance of Interfering Contour above TGL (m)
5	.999	13.0	80.8	80.5	72.0
10	.982	12.5	79.4	78.2	65.2
15	.954	11.8	77.2	74.6	59.0
20	.918	11.0	74.3	69.8	53.6
25	.871	9.9	70.5	63.9	49.2
30	.818	8.7	66.2	57.3	45.9
35	.758	7.5	61.3	50.2	43.8
40	.691	6.2	55.9	42.8	43.1
45	.616	4.9	49.8	35.2	43.8
50	.538	3.8	43.5	28.0	45.7
55	.465	2.8	37.6	21.6	48.2
60	.391	2.0	31.6	15.8	51.6
65	.313	1.3	25.3	10.7	56.0
70	.239	0.7	19.3	6.6	60.8
75	.176	0.4	14.2	3.7	65.2
80	.128	0.2	10.4	1.8	68.8
85	.103	0.1	8.3	0.7	70.7
90	.105	0.1	8.5	0.0	70.5
Minimum Clearance above TGL:					<b>43.1 m</b>



BKO77

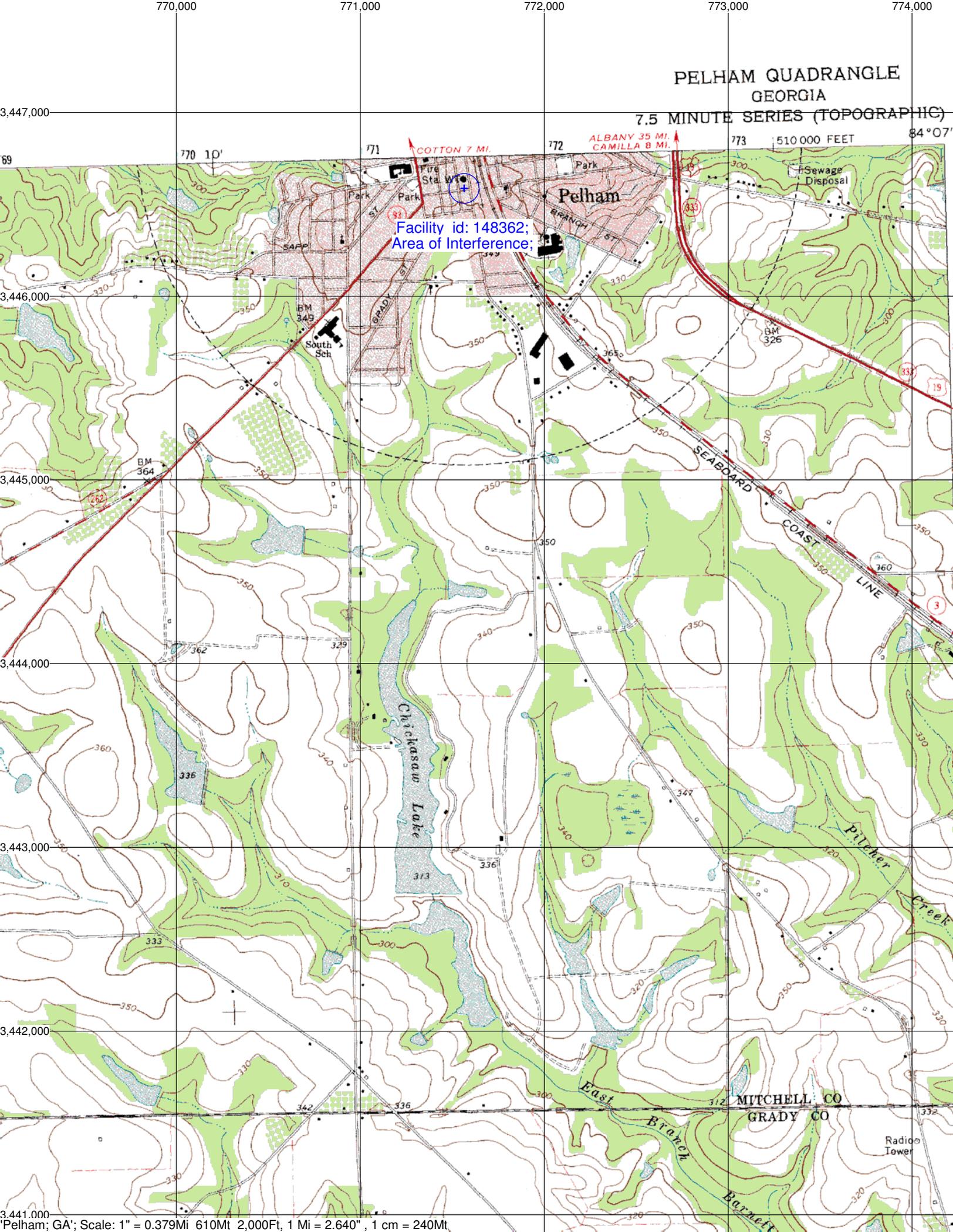
<b>Vertical</b>	-66	0.297	54	0.479	174	0.468
<b>Values</b>	-63	0.345	57	0.436	177	0.479
-180	0.487	-60	0.391	60	0.391	
-177	0.478	-57	0.436	63	0.345	
-174	0.467	-54	0.479	66	0.297	
-171	0.460	-51	0.523	69	0.253	
-168	0.454	-48	0.568	72	0.211	
-165	0.447	-45	0.616	75	0.176	
-162	0.439	-42	0.661	78	0.145	
-159	0.429	-39	0.706	81	0.120	
-156	0.419	-36	0.745	84	0.105	
-153	0.402	-33	0.783	87	0.100	
-150	0.385	-30	0.818	90	0.105	
-147	0.369	-27	0.852	93	0.118	
-144	0.359	-24	0.881	96	0.134	
-141	0.350	-21	0.910	99	0.151	
-138	0.338	-18	0.934	102	0.168	
-135	0.326	-15	0.954	105	0.185	
-132	0.314	-12	0.972	108	0.202	
-129	0.303	-9	0.987	111	0.219	
-126	0.290	-6	0.999	114	0.236	
-123	0.278	-3	0.999	117	0.252	
-120	0.265	0	1.000	120	0.265	
-117	0.251	3	0.999	123	0.278	
-114	0.236	6	0.999	126	0.290	
-111	0.218	9	0.987	129	0.304	
-108	0.202	12	0.972	132	0.314	
-105	0.185	15	0.954	135	0.327	
-102	0.168	18	0.934	138	0.338	
-99	0.151	21	0.910	141	0.350	
-96	0.134	24	0.881	144	0.360	
-93	0.118	27	0.852	147	0.370	
-90	0.105	30	0.818	150	0.386	
-87	0.100	33	0.783	153	0.403	
-84	0.105	36	0.745	156	0.420	
-81	0.120	39	0.706	159	0.430	
-78	0.145	42	0.661	162	0.440	
-75	0.176	45	0.616	165	0.448	
-72	0.211	48	0.568	168	0.455	
-69	0.253	51	0.523	171	0.461	

Better than SWR

**Adjacent Channel Study  
For Station W260BS, Facility\_id: 148362**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1117956	74182	BMLH	20060308ACZ	WOBB	CC LICENSES, LLC	C0	TIFTON	GA	LIC	100	412	262	2	51.1	0.0776
645341	152220	BNPFT	20030317DPZ	NEW	EDGEWATER BROADCASTING, INC.	D	CAIRO	GA	APP	0.013	177.3	257	3	26.3	0
651676	158101	BNPFT	20030317MHK	NEW	CLEAR CHANNEL BROADCASTING LICENSES, INC	D	PALMYER	GA	APP	0.2	104	258	2	59.1	0
1134299	144622	BLFT	20060616AAC	W258BC	WAY-FM MEDIA GROUP, INC	D	PERKINS	FL	LIC	0.01	144	258	2	69.9	0
1139632	9311	BLH	20060713AAB	WEGT	OPUS BROADCASTING TALLAHASSEE, LLC	A	LAFAYETTE	FL	LIC	5.5	127	260	0	70.4	0
1189371	152360	BLFT	20070601BRN	W260AT	EDGEWATER BROADCASTING INC.	D	TIFTON	GA	LIC	0.019	194	260	0	71.9	0
1177616	144622	BMPFT	20070320AJD	W258BC	WAY-FM MEDIA GROUP, INC	D	PERKINS	FL	CP MOD	0.25	123	258	2	73.8	0
1182217	71343	BPH	20070413AAB	WKAA	RTG RADIO, LLC	C1	WILLACOCHEE	GA	APP	73	302	258	2	75	0
1020138	71343	BLH	20041020ADN	WKAA	RTG RADIO, LLC	C1	WILLACOCHEE	GA	LIC	43	302.4	258	2	75	0
1171623	71343	BMXPH	20070206AAW	WKAA	RTG RADIO, L.L.C.	C1	WILLACOCHEE	GA	CP	2	121.9	258	2	87.4	0
1165651	71343	BXPH	20061221ACC	WKAA	RTG RADIO, L.L.C.	C1	WILLACOCHEE	GA	CP	2	106.7	258	2	87.4	0
78129	73674	BLH	19850506KS	WOOF-FM	WOOF, INC.	C1	DOTHAN	AL	LIC	100	380	259	1	108.9	0
1201068	60591	BMPH	20071026AAY	WLDA	MAGIC BROADCASTING ALABAMA LICENSING, LL	C3	SLOCOMB	AL	APP	16.5	205.6	263	3	119.5	0



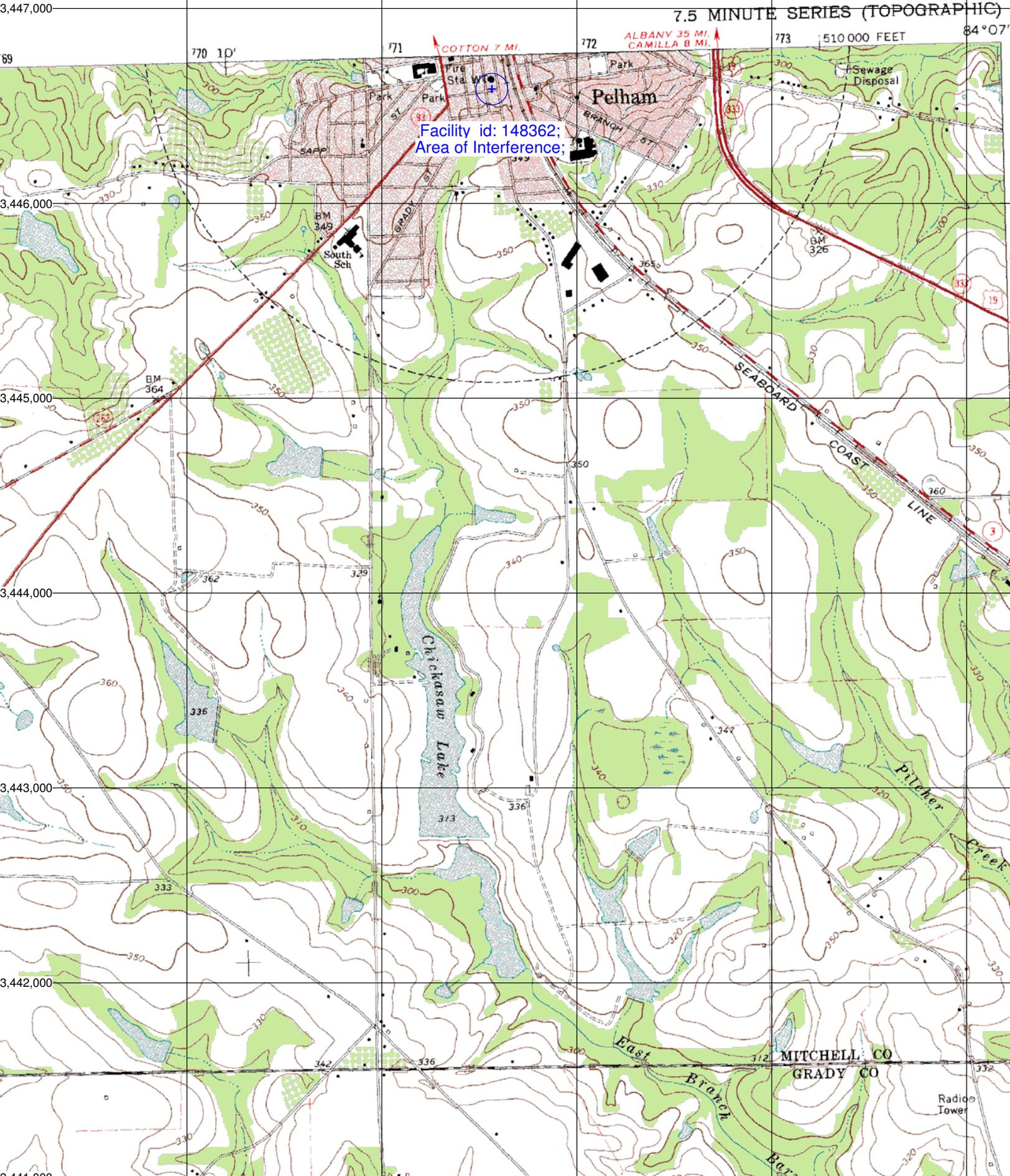
PELHAM QUADRANGLE  
GEORGIA

7.5 MINUTE SERIES (TOPOGRAPHIC)

510 000 FEET

84°07'

Facility id: 148362;  
Area of Interference;





84.1522

31.1236

31.1238