

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317DUN

Channel: 279

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 "LPFM 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 Results

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
NEW	MO	UNIONVILLE	279	140	EDGEWATER BROADCASTING INC.	BNPFT20030317ERZ	D	APP	82.75	10.13 dB	152505
KXKT-FM1	NE	OMAHA	279	17000	CAPSTAR TX LIMITED PARTNERSHIP	BLFTB19920720TC	D	LIC	199.84	12.27 dB	69683
NEW	IA	CENTERVILLE	279	100	IOWA DEPARTMENT OF TRANSPORTATION	BNPL20010615AJV	LP100	APP	105.91	19.00 dB	134062
NEW	IA	WEST DES MOINES	279	250	UNIVERSITY OF NORTHERN IOWA	BNPFT20030314CAH	D	APP	132.29	22.82 dB	144569
NEW	IA	KNOXVILLE	279	140	EDGEWATER BROADCASTING INC.	BNPFT20030317DFM	D	APP	132.82	23.48 dB	151569
KBEQ-FM	MO	KANSAS CITY	282	99000	INFINITY RADIO SUBSIDIARY OPERATIONS INC.	BLH19850813KT	C	LIC	147.8	24.93 dB	48961
KRLI	MO	MALTA BEND	280	12000	KANZA, INC.	BPH20021104AEG	C2	APP	122.26	24.20 dB	42384
KAZR	IA	PELLA	277	100000	SAGA COMMUNICATIONS OF IOWA, LLC	BPH20011101AAX	C0	CP	148.7	24.51 dB	28882
KXKT	IA	GLENWOOD	279	100000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19970725KD	C	LIC	200.08	25.34 dB	69686
KAZR	IA	PELLA	277	100000	SAGA COMMUNICATIONS OF IOWA, LLC	BMLH19931025KA	C1	LIC	143.49	26.19 dB	28882
KPRS	MO	KANSAS CITY	277	100000	CARTER BROADCAST GROUP, INC.	BLH19870522KA	C	LIC	155.6	26.55 dB	35495
NEW	IA	DES MOINES	279	75	EDGEWATER BROADCASTING INC.	BNPFT20030317DEW	D	APP	146.04	27.23 dB	151548
NEW	IA	OTTUMWA	279	34	EDGEWATER BROADCASTING INC.	BNPFT20030317DGB	D	APP	147.37	28.07 dB	151689
NEW	KS	SHAWNEE	279	75	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030313BOI	D	APP	160.59	28.83 dB	139581
KRLI	MO	MALTA BEND	280	3400	KANZA, INC.	BMLH20021028AAF	C3	LIC	122.26	29.63 dB	42384
NEW	MO	LEE S SUMMIT	279	170	EDGEWATER BROADCASTING INC.	BNPFT20030317EJG	D	APP	172.39	29.45 dB	152455
KLTI-FM	IA	AMES	281	100000	SAGA COMMUNICATIONS OF IOWA, LLC	BLH19861229KC	C	LIC	171.13	30.06 dB	7823
KNZA	KS	HIAWATHA	280	50000	KNZA, INC.	BLH19940622KA	C2	LIC	158.82	31.23 dB	35285
NEW	MO	BOONVILLE	279	250	COMMUNITY BROADCASTING, INC.	BNPFT20030312BAP	D	APP	191.61	32.11 dB	140401
NEW	MO	HUNTSVILLE	278	50000	DSHEP LLC	BIPH20010724ADB	C2	APP	165.2	32.65 dB	136067
KBEQ-FM	MO	KANSAS CITY	282	33000	INFINITY RADIO SUBSIDIARY OPERATIONS INC.	BXPHT20011016AAM	C	CP	147.8	33.36 dB	48961
KXKT	IA	GLENWOOD	279	0	CAPSTAR TX LIMITED PARTNERSHIP		C	USE	179.23	35.10 dB	69686
NEW	IA	AMES	279	92	EDGEWATER BROADCASTING INC.	BNPFT20030317DEG	D	APP	194.16	35.18 dB	151522
NEW	IA	VICTOR	279	100	IOWA DEPARTMENT OF TRANSPORTATION	BNPL20010615AHJ	LP100	APP	202.33	36.86 dB	133668
NEW	IA	MARSHALLTOWN	279	50	EDGEWATER BROADCASTING INC.	BNPFT20030317DFW	D	APP	203.6	37.25 dB	151684
KNCY-FM	NE	AUBURN	276	14000	RADIO 2000 NE, INC.	BMLH20020926ACX	C3	LIC	149.08	38.20 dB	63953
KRLI	MO	MALTA BEND	280	0	KANZA, INC.	RM9909	C3	RSV	122.26	38.65 dB	42384
NEW	KS	OSAWATOMIE	279	140	EDGEWATER BROADCASTING INC.	BNPFT20030317DNI	D	APP	224.4	38.84 dB	152185
KRKN	IA	ELDON	282	23500	O-TOWN COMMUNICATIONS, INC.	BLH19960807KD	C3	LIC	154.68	38.78 dB	58762
KRLI	MO	MALTA BEND	280	0	KANZA, INC.		C2	RSV	124.29	39.03 dB	42384