

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 153190

Channel 262

### **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 $\mu$  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 USGS Quadrangle shows a cemetery, gravel pits, unimproved access roads and radio towers within the zone of predicted interference. The cemetery is not habited by living people. The roads are minor county roads. The gravel pits and the radio tower equipment shelters are uninhabited 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.**

Since the proposed translator is within 320 km of the Canadian border, 47 C.F.R. § 74.1235(d) has been taken into account and this applicant certifies that in no direction does the 34 dB $\mu$  F(50,10) extend beyond 60 km, and this application is therefore in full compliance with 47 C.F.R. § 74.1235(d)(3), which states that "the distance to the 34 dB $\mu$  interfering contour may not exceed 60 km in any direction," and hence complies with 47 C.F.R. § 74.1204(h).

## 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 $\mu$  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.

<u>Application_id</u>	<u>File Number</u>	<u>Callsign</u>	<u>Contour at Tower</u>	<u>Min. Contour</u>
281794	BLH19990210KC	WHFB-FM	59.1	59.1
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>59.1</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 **59.1 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **99.1 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **301.3 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 USGS Quadrangle shows a cemetery, gravel pits, unimproved access roads and radio towers within the zone of predicted interference. The cemetery is not habited by living people. The roads are minor county roads. The gravel pits and the radio tower equipment shelters are uninhabited 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: 68 m**  
**Maximum ERP: 0.015 kW**  
**Interfering Contour: 99.1 dB $\mu$**   
**Max Int. Contour Distance: 301.3 m**

**Adjacent Channel Study  
For Station W209BU, Facility\_id: 153190**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
281794	72175	BLH	19990210KC	WHFB-FM	WHFB BROADCAST ASSOCIATES L P	B	BENTON HARBOR	MI	LIC	50	337	260	2	46.5	0.3563
1009537	78387	BLFT	20040830ABJ	W262AF	FRIENDS OF CHRISTIAN RADIO, INC.	D	PARCHMENT	MI	LIC	0.038	316	262	0	26.9	0
1153580	22128	BLH	20061006AAE	WQXC-FM	FORUM COMMUNICATIONS, INC.	A	ALLEGAN	MI	LIC	3	328	265	3	35.7	0
646429	153215	BNPFT	20030317FQS	NEW	EDGEWATER BROADCASTING, INC.	D	SOUTH HAVEN	MI	APP	0.027	273.9	262	0	36.5	0
682905	152865	BNPFT	20030828ATD	W262AU	EDGEWATER BROADCASTING, INC.	D	GRANGER	IN	CP	0.035	298	262	0	48.8	0
650031	156739	BNPFT	20030317KRI	NEW	FAMILY STATIONS, INC.	D	FENNVILLE	MI	APP	0.08	226	262	0	54.6	0
999044	3989	BMLH	20040629AAF	WBCH-FM	BARRY BROADCASTING CO.	A	HASTINGS	MI	LIC	3	359	261	1	68.9	0
200933	51723	BLH	19940713KA	WBYT	PATHFINDER COMMUNICATIONS CORP.	B	ELKHART	IN	LIC	15	517	264	2	69.7	0
1132069	72529	BLH	20060602AAJ	WTRV	REGENT BROADCASTING OF GRAND RAPIDS, IN	A	WALKER	MI	LIC	3	320	263	1	91.6	0
172989	36273	BLH	19920429KA	WLKI	LAKE CITIES BROADCASTING CORPORATION	A	ANGOLA	IN	LIC	4	428	262	0	93.3	0
107775	46706	BLH	19871215KI	WITL-FM	LIGGETT BROADCAST, INC.	B	LANSING	MI	LIC	7.6	445	264	2	125.6	0
78898	46706	BLH	19850610KF	WITL-FM	ENTERCOM LONGVIEW LICENSE, LLC	B	LANSING	MI	LIC	26.5	465	264	2	125.6	0

