

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 154270

Channel 205

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 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 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.

Page 5 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 aerial photo indicates the presence of several unpaved tower access roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision and therefore "lack of population" is demonstrated.

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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
300799	BLED19790810AA	KENW-FM	63.6	63.3
567500	BLFT20010604ABN	K203DG	101.8	94.4
985075	BPED20031212ABS	KENW-FM	81.6	81.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				63.3

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 **63.3 dBμ**, this makes the proposed translator's worst-case interfering contour **103.3 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **371.6 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.

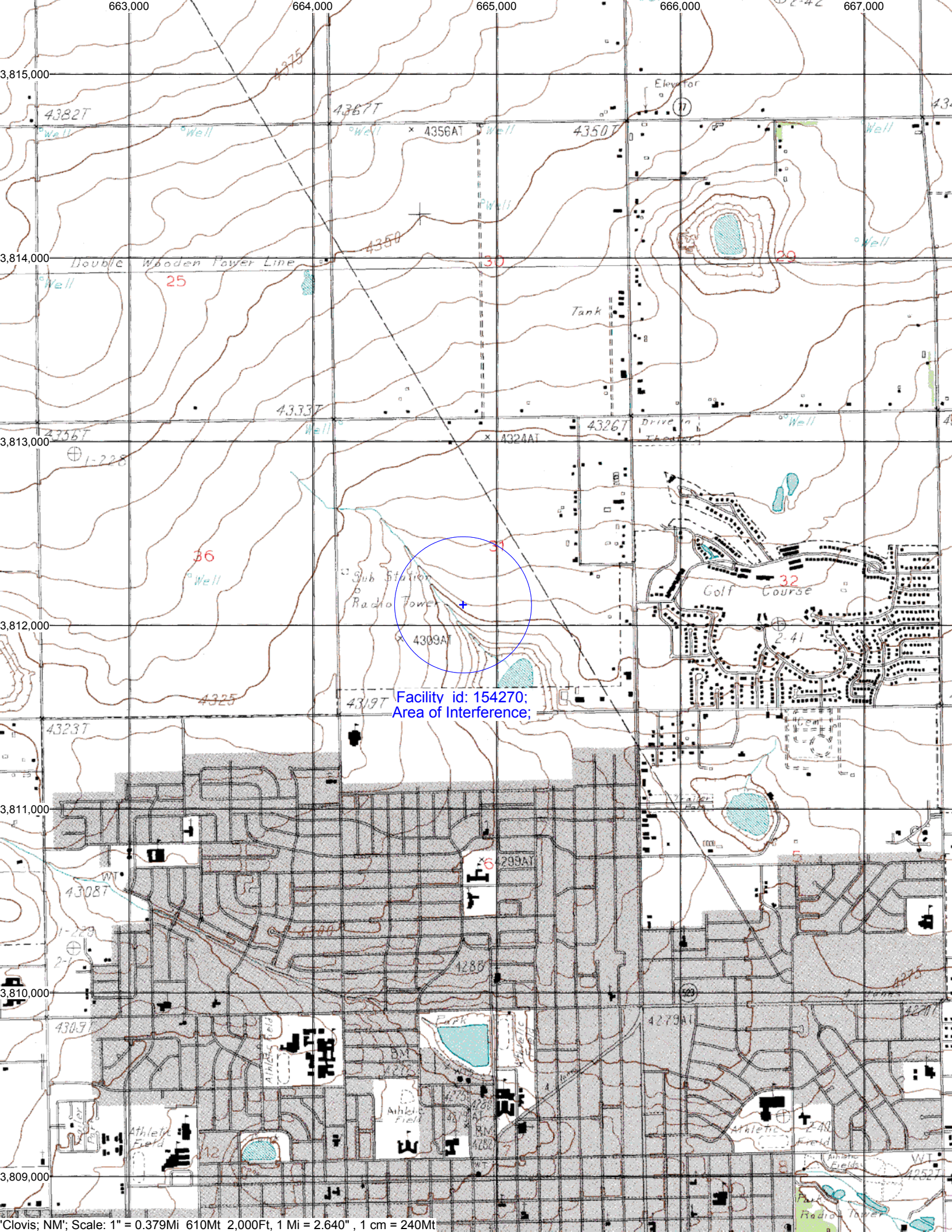
Note: The aerial photo indicates the presence of several unpaved tower access roads in the area of interference. It is apparent that these are not major roads, e.g. interstate highways, as described in the Living Way decision and therefore "lack of population" is demonstrated.

Antenna Manufacturer: NIC
Antenna Model: BKG88
CORAGL: 128 m
Maximum ERP: 0.06 kW
Interfering Contour: 103.3 dBμ
Max Int. Contour Distance: 371.6 m

Adjacent Channel Study **For Station K258AV, Facility_id: 154270**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCMSL	Channel	Adj	Dist	Overlap
567500	93600	BLFT	20010604ABN	K203DG	EDUCATIONAL MEDIA FOUNDATION	D	CLOVIS	NM	LIC	0.05	1370	203	2	0.4	0.358
985075	18344	BPED	20031212ABS	KENW-FM	EASTERN NEW MEXICO UNIVERSITY	C1	PORTALES	NM	CP	100	1426	208	3	21	0.358
300799	18344	BLED	19790810AA	KENW-FM		C1	PORTALES	NM	LIC	100	1295	208	3	32.3	0.358
1110112	89528	BLFT	20060124AFK	K204DB	EDGEWATER BROADCASTING, INC.	D	PORTALES	NM	LIC	0.25	1297	204	1	25.1	0
512833	93907	BPFT	19990723TE	990723TE	YOUR CHRISTIAN COMPANION NETWORK, INC.	D	PORTALES	NM	APP	0.05	1257	206	1	30.8	0
285817	93643	BPED	19990602MU	KHFD	EDUCATIONAL MEDIA FOUNDATION	C2	HEREFORD	TX	CP	28	1241	204	1	85.1	0
508415	122636	BNPFT	20000127ADA	NEW	FAMILY WORSHIP CENTER CHURCH, INC.	D	MORTON	TX	APP	0.099	1182	204	1	90.2	0
1067786	154457	BMPFT	20050609ACC	K258BD	EDGEWATER BROADCASTING, INC.	D	TUCUMCARI	NM	CP MOD	0.115	1354	205	0	96.8	0
676999	65354	BLED	20030805AFF	KOHM	KOHM-FM	C1	LUBBOCK	TX	LIC	70	1155	206	1	154.3	0



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