

Non-Interference Compliance

Regarding Facility id 148639

Channel 218

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.

Pages 4 through 6 include a plot and a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 7 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 8 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 9 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.

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.

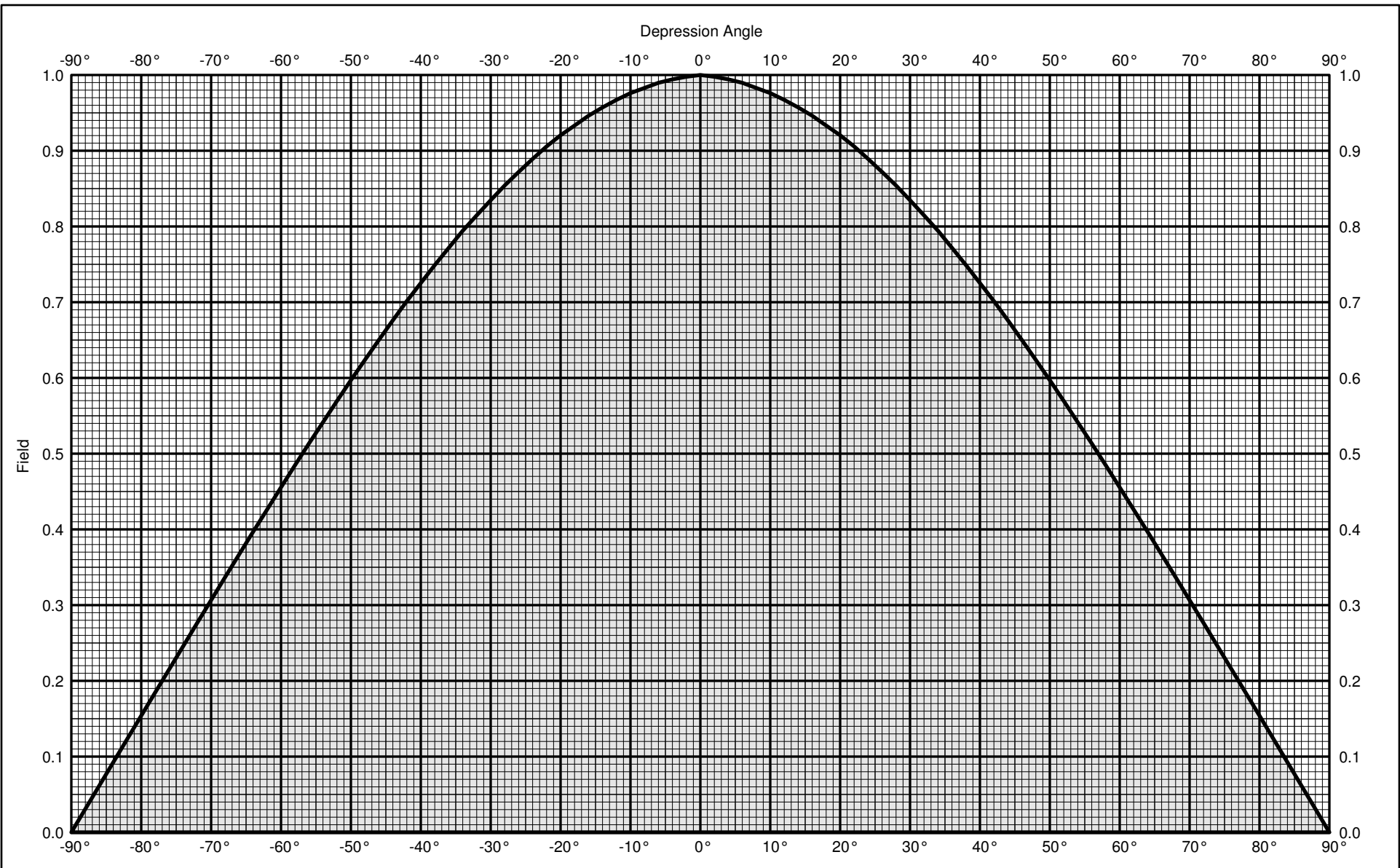
Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1041883	BPED19960820MC	KUNZ	73.8	73
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				73

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 **73 dBμ**, this makes the proposed translator's worst-case interfering contour **113 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **108.8 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 **10 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.

Antenna Manufacturer:	SCA
Antenna Model:	GP-FM
CORAGL:	61 m
Maximum ERP:	0.048 kW
Interfering Contour:	113 dBμ
Max Int. Contour Distance:	108.8 m
Min Ground Clearance:	10 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	.992	47.2	107.9	107.5	51.6
10	.976	45.7	106.2	104.6	42.6
15	.952	43.5	103.6	100.0	34.2
20	.920	40.6	100.1	94.1	26.8
25	.881	37.3	95.9	86.9	20.5
30	.835	33.5	90.8	78.7	15.6
35	.783	29.4	85.2	69.8	12.1
40	.725	25.2	78.9	60.4	10.3
45	.663	21.1	72.1	51.0	10.0
50	.597	17.1	65.0	41.8	11.2
55	.527	13.3	57.3	32.9	14.0
60	.456	10.0	49.6	24.8	18.0
65	.382	7.0	41.6	17.6	23.3
70	.307	4.5	33.4	11.4	29.6
75	.231	2.6	25.1	6.5	36.7
80	.154	1.1	16.8	2.9	44.5
85	.077	0.3	8.4	0.7	52.7
90	.010	0.0	1.1	0.0	59.9
Minimum Clearance above TGL:					10 m



GP-FM Groundplane

Vertical radiation pattern

FM

0.0 dBd (2.15 dBi)

Vertical polarization



KATHREIN
SCALA DIVISION
 Post Office Box 4580 Phone:(541)779-6500
 Medford, OR 97501 (USA) Fax:(541)779-3991
<http://www.kathrein-scala.com>



GP-FM Groundplane

Vertical radiation pattern

FM

0.0 dBd (2.15 dBi)

Vertical polarization

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
-90	0.010	-40.00	-40.00	0.00	-45	0.663	-3.57	-3.57	0.44
-89	0.015	-36.24	-36.24	0.00	-44	0.676	-3.40	-3.40	0.46
-88	0.031	-30.22	-30.22	0.00	-43	0.689	-3.24	-3.24	0.47
-87	0.046	-26.70	-26.70	0.00	-42	0.701	-3.08	-3.08	0.49
-86	0.062	-24.20	-24.20	0.00	-41	0.713	-2.93	-2.93	0.51
-85	0.077	-22.26	-22.26	0.01	-40	0.725	-2.79	-2.79	0.53
-84	0.092	-20.68	-20.68	0.01	-39	0.737	-2.65	-2.65	0.54
-83	0.108	-19.34	-19.34	0.01	-38	0.749	-2.51	-2.51	0.56
-82	0.123	-18.18	-18.18	0.02	-37	0.760	-2.38	-2.38	0.58
-81	0.139	-17.16	-17.16	0.02	-36	0.772	-2.25	-2.25	0.60
-80	0.154	-16.25	-16.25	0.02	-35	0.783	-2.12	-2.12	0.61
-79	0.169	-15.42	-15.42	0.03	-34	0.794	-2.00	-2.00	0.63
-78	0.185	-14.67	-14.67	0.03	-33	0.805	-1.89	-1.89	0.65
-77	0.200	-13.98	-13.98	0.04	-32	0.815	-1.78	-1.78	0.66
-76	0.215	-13.34	-13.34	0.05	-31	0.825	-1.67	-1.67	0.68
-75	0.231	-12.75	-12.75	0.05	-30	0.835	-1.57	-1.57	0.70
-74	0.246	-12.19	-12.19	0.06	-29	0.844	-1.47	-1.47	0.71
-73	0.261	-11.67	-11.67	0.07	-28	0.854	-1.37	-1.37	0.73
-72	0.276	-11.17	-11.17	0.08	-27	0.863	-1.28	-1.28	0.74
-71	0.291	-10.71	-10.71	0.08	-26	0.872	-1.19	-1.19	0.76
-70	0.307	-10.27	-10.27	0.09	-25	0.881	-1.10	-1.10	0.78
-69	0.322	-9.85	-9.85	0.10	-24	0.889	-1.02	-1.02	0.79
-68	0.337	-9.45	-9.45	0.11	-23	0.897	-0.94	-0.94	0.81
-67	0.352	-9.07	-9.07	0.12	-22	0.906	-0.86	-0.86	0.82
-66	0.367	-8.71	-8.71	0.13	-21	0.913	-0.79	-0.79	0.83
-65	0.382	-8.36	-8.36	0.15	-20	0.920	-0.72	-0.72	0.85
-64	0.397	-8.03	-8.03	0.16	-19	0.927	-0.66	-0.66	0.86
-63	0.411	-7.71	-7.71	0.17	-18	0.933	-0.60	-0.60	0.87
-62	0.426	-7.41	-7.41	0.18	-17	0.940	-0.54	-0.54	0.88
-61	0.441	-7.12	-7.12	0.19	-16	0.946	-0.48	-0.48	0.90
-60	0.456	-6.83	-6.83	0.21	-15	0.952	-0.43	-0.43	0.91
-59	0.470	-6.56	-6.56	0.22	-14	0.957	-0.38	-0.38	0.92
-58	0.485	-6.29	-6.29	0.23	-13	0.962	-0.33	-0.33	0.93
-57	0.499	-6.04	-6.04	0.25	-12	0.967	-0.29	-0.29	0.94
-56	0.513	-5.79	-5.79	0.26	-11	0.972	-0.25	-0.25	0.94
-55	0.527	-5.56	-5.56	0.28	-10	0.976	-0.21	-0.21	0.95
-54	0.541	-5.33	-5.33	0.29	-9	0.979	-0.18	-0.18	0.96
-53	0.555	-5.11	-5.11	0.31	-8	0.983	-0.15	-0.15	0.97
-52	0.570	-4.89	-4.89	0.32	-7	0.986	-0.12	-0.12	0.97
-51	0.583	-4.68	-4.68	0.34	-6	0.990	-0.09	-0.09	0.98
-50	0.597	-4.48	-4.48	0.36	-5	0.992	-0.07	-0.07	0.98
-49	0.610	-4.29	-4.29	0.37	-4	0.994	-0.05	-0.05	0.99
-48	0.624	-4.10	-4.10	0.39	-3	0.996	-0.03	-0.03	0.99
-47	0.637	-3.92	-3.92	0.41	-2	0.998	-0.02	-0.02	1.00
-46	0.650	-3.74	-3.74	0.42	-1	0.999	-0.01	-0.01	1.00
					0	1.000	0.00	0.00	1.00



GP-FM Groundplane
FM

0.0 dBd (2.15 dBi)

Vertical polarization

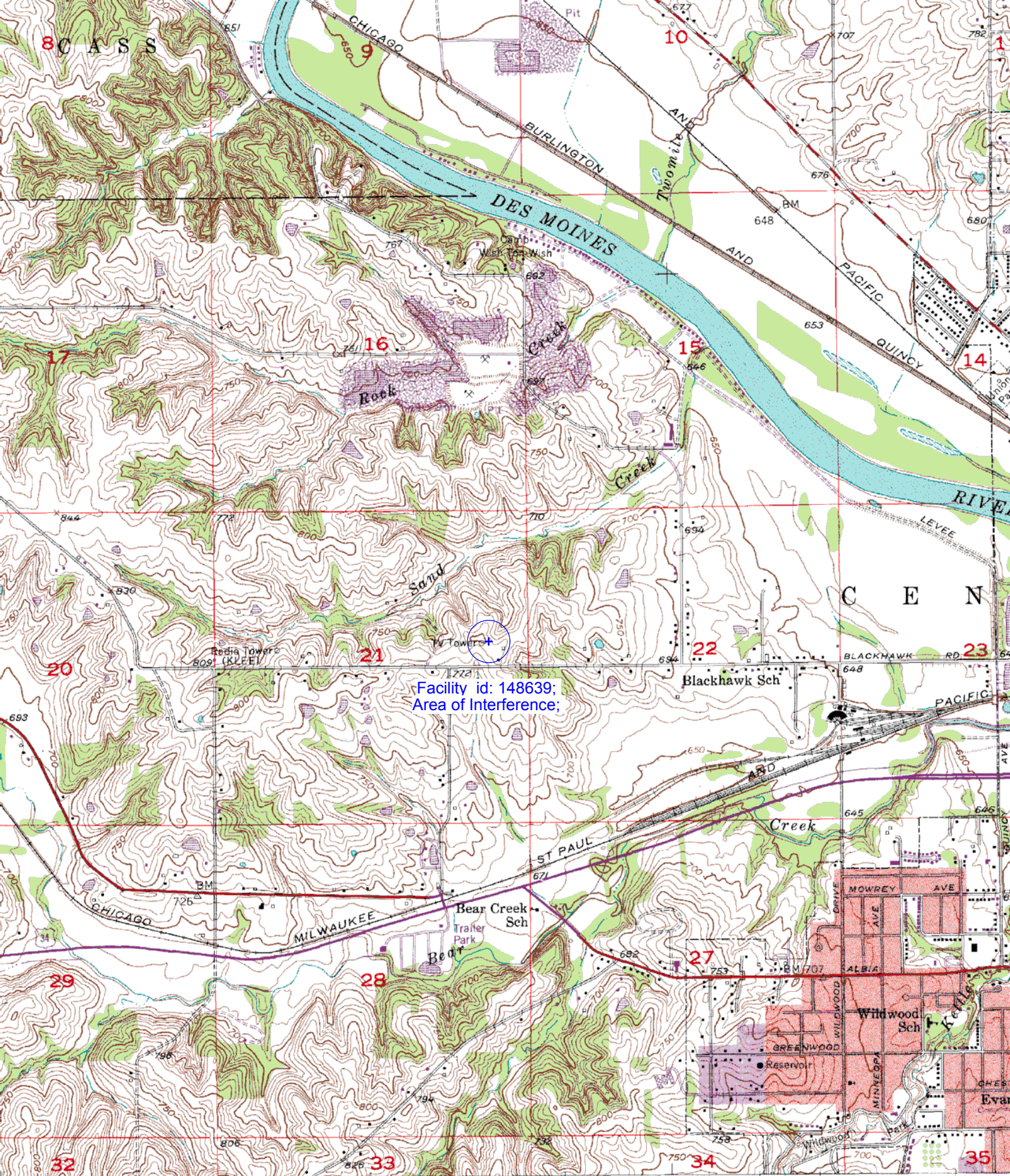
Vertical radiation pattern

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
0	1.000	0.00	0.00	1.00	45	0.663	-3.57	-3.57	0.44
1	0.999	-0.01	-0.01	1.00	46	0.650	-3.74	-3.74	0.42
2	0.998	-0.02	-0.02	1.00	47	0.637	-3.92	-3.92	0.41
3	0.996	-0.03	-0.03	0.99	48	0.624	-4.10	-4.10	0.39
4	0.994	-0.05	-0.05	0.99	49	0.610	-4.29	-4.29	0.37
5	0.992	-0.07	-0.07	0.98	50	0.597	-4.48	-4.48	0.36
6	0.990	-0.09	-0.09	0.98	51	0.583	-4.68	-4.68	0.34
7	0.986	-0.12	-0.12	0.97	52	0.570	-4.89	-4.89	0.32
8	0.983	-0.15	-0.15	0.97	53	0.555	-5.11	-5.11	0.31
9	0.979	-0.18	-0.18	0.96	54	0.541	-5.33	-5.33	0.29
10	0.976	-0.21	-0.21	0.95	55	0.527	-5.56	-5.56	0.28
11	0.972	-0.25	-0.25	0.94	56	0.513	-5.79	-5.79	0.26
12	0.967	-0.29	-0.29	0.94	57	0.499	-6.04	-6.04	0.25
13	0.962	-0.33	-0.33	0.93	58	0.485	-6.29	-6.29	0.23
14	0.957	-0.38	-0.38	0.92	59	0.470	-6.56	-6.56	0.22
15	0.952	-0.43	-0.43	0.91	60	0.456	-6.83	-6.83	0.21
16	0.946	-0.48	-0.48	0.90	61	0.441	-7.12	-7.12	0.19
17	0.940	-0.54	-0.54	0.88	62	0.426	-7.41	-7.41	0.18
18	0.933	-0.60	-0.60	0.87	63	0.411	-7.71	-7.71	0.17
19	0.927	-0.66	-0.66	0.86	64	0.397	-8.03	-8.03	0.16
20	0.920	-0.72	-0.72	0.85	65	0.382	-8.36	-8.36	0.15
21	0.913	-0.79	-0.79	0.83	66	0.367	-8.71	-8.71	0.13
22	0.906	-0.86	-0.86	0.82	67	0.352	-9.07	-9.07	0.12
23	0.897	-0.94	-0.94	0.81	68	0.337	-9.45	-9.45	0.11
24	0.889	-1.02	-1.02	0.79	69	0.322	-9.85	-9.85	0.10
25	0.881	-1.10	-1.10	0.78	70	0.307	-10.27	-10.27	0.09
26	0.872	-1.19	-1.19	0.76	71	0.291	-10.71	-10.71	0.08
27	0.863	-1.28	-1.28	0.74	72	0.276	-11.17	-11.17	0.08
28	0.854	-1.37	-1.37	0.73	73	0.261	-11.67	-11.67	0.07
29	0.844	-1.47	-1.47	0.71	74	0.246	-12.19	-12.19	0.06
30	0.835	-1.57	-1.57	0.70	75	0.231	-12.75	-12.75	0.05
31	0.825	-1.67	-1.67	0.68	76	0.215	-13.34	-13.34	0.05
32	0.815	-1.78	-1.78	0.66	77	0.200	-13.98	-13.98	0.04
33	0.805	-1.89	-1.89	0.65	78	0.185	-14.67	-14.67	0.03
34	0.794	-2.00	-2.00	0.63	79	0.169	-15.42	-15.42	0.03
35	0.783	-2.12	-2.12	0.61	80	0.154	-16.25	-16.25	0.02
36	0.772	-2.25	-2.25	0.60	81	0.139	-17.16	-17.16	0.02
37	0.760	-2.38	-2.38	0.58	82	0.123	-18.18	-18.18	0.02
38	0.749	-2.51	-2.51	0.56	83	0.108	-19.34	-19.34	0.01
39	0.737	-2.65	-2.65	0.54	84	0.092	-20.68	-20.68	0.01
40	0.725	-2.79	-2.79	0.53	85	0.077	-22.26	-22.26	0.01
41	0.713	-2.93	-2.93	0.51	86	0.062	-24.20	-24.20	0.00
42	0.701	-3.08	-3.08	0.49	87	0.046	-26.70	-26.70	0.00
43	0.689	-3.24	-3.24	0.47	88	0.031	-30.22	-30.22	0.00
44	0.676	-3.40	-3.40	0.46	89	0.015	-36.24	-36.24	0.00
					90	0.010	-40.00	-40.00	0.00

Adjacent Channel Study **For Station NEW, Facility_id: 148639**

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1041883	83086	BPED	19960820MC	KUNZ	UNIVERSITY OF NORTHERN IOWA	A	OTTUMWA	IA	CP	1.9	351	216	2	10.9	0.2864
216469	39462	BMLH	19951120KE	KRLS	M AND H BROADCASTING, INC.	C3	KNOXVILLE	IA	LIC	15.5	338	221	3	58.3	0
210805	1658	BLFT	19950628TC	K218BU	AMERICAN FAMILY ASSOCIATION	D	MEMPHIS	MO	LIC	0.25	268	218	0	69.2	0
239069	85063	BPED	19970113MB	970113MB	AMERICAN FAMILY ASSOCIATION	A	KIRKSVILLE	MO	APP	6	334	218	0	75.4	0
251829	87796	BPED	19970806MA	970806MA	GREAT COMMISSION BROADCASTING CORP	A	KIRKSVILLE	MO	APP	1	366	220	2	88.7	0
189510	8777	BLFT	19930830TG	K220CN	CARE BROADCASTING, INC.	D	KIRKSVILLE, ETC.	MO	LIC	0.234	366	220	2	88.7	0
687431	20849	BLED	20030923ABC	KDFR	FAMILY STATIONS, INC.	C2	DES MOINES	IA	LIC	32	405	217	1	110.1	0
228779	66626	BLED	19960708KC	KSUI	THE UNIVERSITY OF IOWA	C	IOWA CITY	IA	LIC	95	626	219	1	121.8	0
282211	7635	BLH	19990223KC	WQKQ	BICK BROADCASTING CO.	B1	CARTHAGE	IL	LIC	25	291	221	3	123.8	0
73868	69158	BMLED	19841106LW	KUNI	UNIVERSITY OF NORTHERN IOWA	C	CEDAR FALLS	IA	LIC	94	799	215	3	152.3	0



Facility id: 148639;
Area of Interference;

Map compiled, edited, and published by the Geological Survey
under control by USGS and USC&GS

Topography from aerial photographs by photogrammetric methods
and in part by City of Ottumwa. Aerial photographs taken 1955

Ottumwa North; IA; Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2,640", 1 cm = 240Mt





92.4694

41.0247

41.0247