

EXHIBIT 12

REFERENCE CH# 260D - 99.9 MHz, Pwr= 0.25 kw, HAAT=0.0 M, COR= 2185 M DISPLAY DATES
 43 45 18 N Average Protected F(50-50)= 7.09 km DATA 01-16-03
 116 05 52 W Ave. F(50-10) 40 dBu= 23.8 54 dBu= 10.1 80 dBu= 2.3 100 dBu= 1.1 SEARCH 02-06-03

CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
260D Boise	K206CT	APP ID	C 180.0	0.00 BPFT20021016ABA	43 45 18 116 05 52	0.010	2185 10.2	3.2 Educational Media Foundati	-17.25	-26.91
262C1 Payette	*KQXR	LIC ID	CX 103.5	33.93 BMLH20020715AAX	43 49 31 116 30 29	100.000 98	1047 5.8	50.5 Journal Broadcast Corporat	-12.40	-17.67
> Reference HAAT at 283.5°= 903.8 M, Pwr= 0.25 kw, Pro. Dist. = 40.54 km, Int Dist. = 1.11 km										
258C1 Fruitland	*KWEIFM	LIC ID	CN 139.9	38.05 BLH19940629KB	44 00 58 116 24 15	8.000 986	1835 5.8	76.8 Treasure Valley Broadcasti	-9.11	-39.84
> Reference HAAT at 319.9°= 944.7 M, Pwr= 0.25 kw, Pro. Dist. = 41.39 km, Int Dist. = 1.11 km										
206D Boise	*K206CT	LIC ID	C 180.0	0.00 BLFT20020308ABD	43 45 18 116 05 52	0.010 624	2185 14.0	14.0 Educational Media Foundati	-14.0R	14.0M
> Reference HAAT at 0.0°= 596.2 M, Pwr= 0.25 kw, Pro. Dist. = 32.14 km, Int Dist. = 35.11 km										
206A Ontario	KZJC.C	CP OR	VX 111.4	76.46 BMPED20020729ACC	44 00 06 116 59 09	0.100	685 0.0	5.6 Csn International	5.5R	71.0M

* = ERP and HAAT on direct line to and from reference station.

Compliance with 74.1204

The proposed modification of K206CT is located within the protected 60 dBu F(50,50) Contour of second-adjacent stations KQXR, Channel 262C1, Payette, ID and KWEI-FM, Channel 258C1, Fruitland, ID.

47 C.F.R. 74.1204(a) states that "[a]n application for an FM translator station will not be accepted for filing if the proposed operation would involve overlap of predicted field contours with any other authorized commercial or noncommercial educational FM broadcast stations, FM translators, and Class D (secondary) noncommercial educational FM stations; or if it would result in new or increased overlap with an LP100 station..."

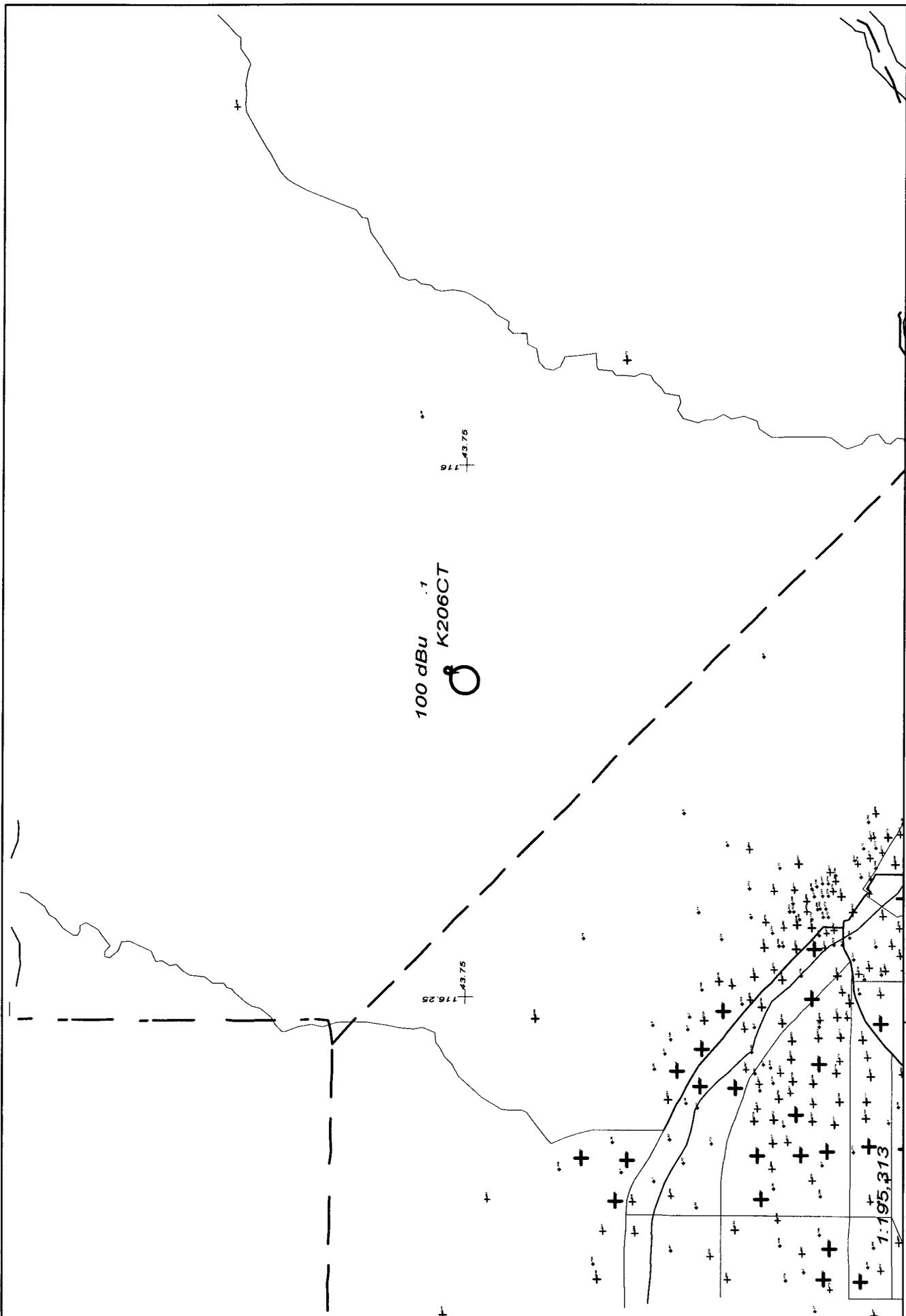
However, this restriction is removed by 73.1204(d) in the event that "...the area of such overlap lies entirely over water. In addition, an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such other factors as may be applicable."

The Commission clarified this ruling in regard to Living Way Ministries' application for Channel 220 at Sun Valley, California. This September 9, 2002 Memorandum Opinion and Order clarified what constitutes acceptable procedures and evidence that an area is not populated.

EMF respectfully submits that the area contained within its 100dBu F(50,10) interfering contour is not populated, and therefore does not violate the provisions of 74.1204. As evidence to support this claim, EMF submits the following:

1. The signal reaching the proposed site from KQXR is 69 dBu and from KWEI is 77 dBu. Using a 40 dBu U/D ratio, the actual interfering contour of the proposed facility would be 109 dBu and 117 dBu, respectively. The interfering contour from the "worst case" of these two contours (109 dBu) does not extend over the Bogles Basin Road or the ski-lift area (see Exhibit 12C).
2. Computer software that uses the centroid method and the 2000 census shows no population centroids within approximately 9 kilometers of the 100dBu interfering contour (see Exhibit 12B).
3. The USGS map of the area (see Exhibit 12C) does not show any structures within the area of overlap except those of transmitter buildings and other utility buildings.

Therefore, EMF respectfully requests a waiver of 47 C.F.R. 74.1204(a) based on compliance with 74.1204(d), no population within the area of predicted overlap.



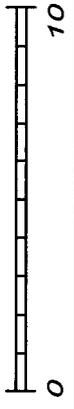
100 dBu
K206CT

176.25
43.75

176
43.75

1:195,313

Scale in km



K206CT 260D .25kW 2185M AMSL

N. Lat. 43 45 18 W. Lng. 116 05 52

EXHIBIT 12B

EMF - 02/03



Target is 43° 45' 18"N, 116° 05' 52"W - **SHAFER BUTTE** quad [Quad Info]

