

[Exhibit 12A]

Non-Interference Compliance using Longley Rice Contours

Regarding Facility id 151525

Channel 258

Description of Exhibit 12A Contents

The purpose of this exhibit is to request a terrain waiver based on Longley Rice contours and to demonstrate that this proposal will not cause interference to application BMJPFT-20030310AYO for Rifle, CO (FIN: 12377).

Page 2 of this exhibit (Exhibit 2A) consists of a shaded elevation map showing the protected contours of K244AN and the interfering contours of proposed K258BP. The proposed transmit site of K258BP is 98km from the transmit site for K244AN. There are mountains in excess of 3,000m separating these two sites. This map is a visual demonstration that the signal of K244AN does not reach Grand Junction and that the signal from K258BP will not interfere with K244AN.

Page 3 of this exhibit (Exhibit 2B) is a plot of the 60dBμ F(50,50) and 40dBμ F(50,10) contours of proposed K258BP and K244AN. Note that there is prohibitive overlap on radials 56° through 61° from the transmit site of K258BP. The 40dBμ Longley Rice contour for K258BP is also plotted on this map. Note that the Longley Rice contour does not intersect the protected 60dBμ F(50,50) contour of K244AN; therefore, this application is in full compliance with the provisions of 74 C.F.R § 74.1204(d) which states *"...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..."*.

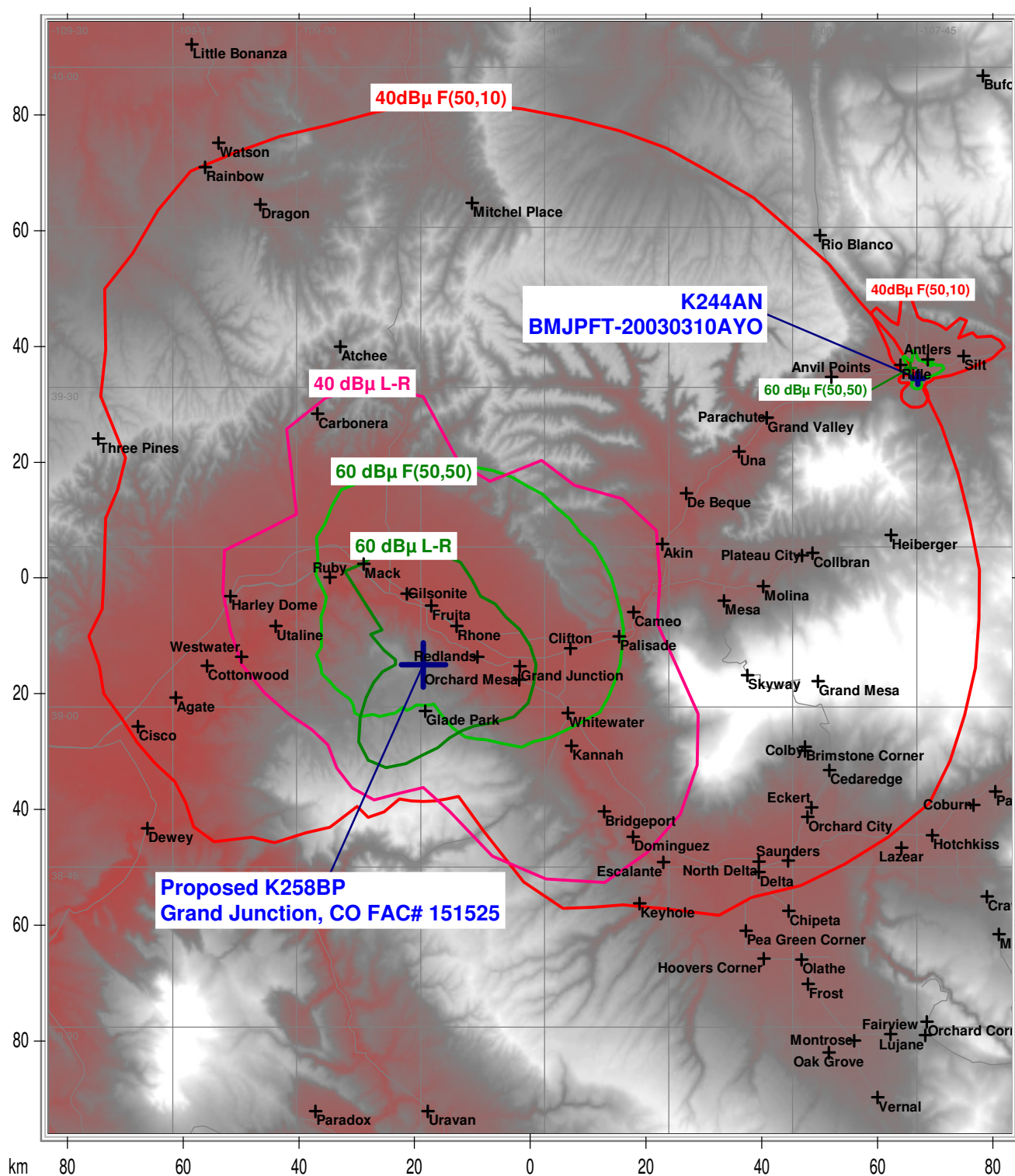
Pages 4 and 5 of this exhibit (Table 1) consist of tabular data showing the ERP, HAAT, ΔH, and the distance from the transmit site of K258BP to the 40 dBμ Longley Rice contour. Table 1 has been included in this exhibit to tabulate the ΔH values, as calculated by ComStudy Version 2.2, on 36 radials emanating from the proposed transmit site. According to the OET guidelines, "Where the ΔH is used as the sole determinant that the terrain along a radial widely departs from the 50 meter standard, a ΔH of 20m or less, or 100m or more" must be demonstrated. Of the 36 ΔH values calculated and tabulated in Table 1, 36 or 100% of the total are 100m or more, indicating that the terrain surrounding the transmit site "departs widely" from the 50m standard. The bearing from the transmit site to the prohibited overlap with K244AN lie over an arc between 56° and 61°. Radial 60° has a ΔH value of 550m. This ΔH value indicates that the terrain in the direction of this overlap "departs widely" from the 50m standard and therefore the use of Longley Rice contours is justified.

The 1997 OET guidelines were developed to quantitatively determine when Longley Rice contours could be used to substitute for the standard FCC contours. Applicant acknowledges that these guidelines were primarily developed for full service broadcast facilities, but these principles apply to translators as well.

Page 6 of this exhibit consists of a table listing all ComStudy 2.2 settings used to generate the Longley Rice 40dBμ contours.

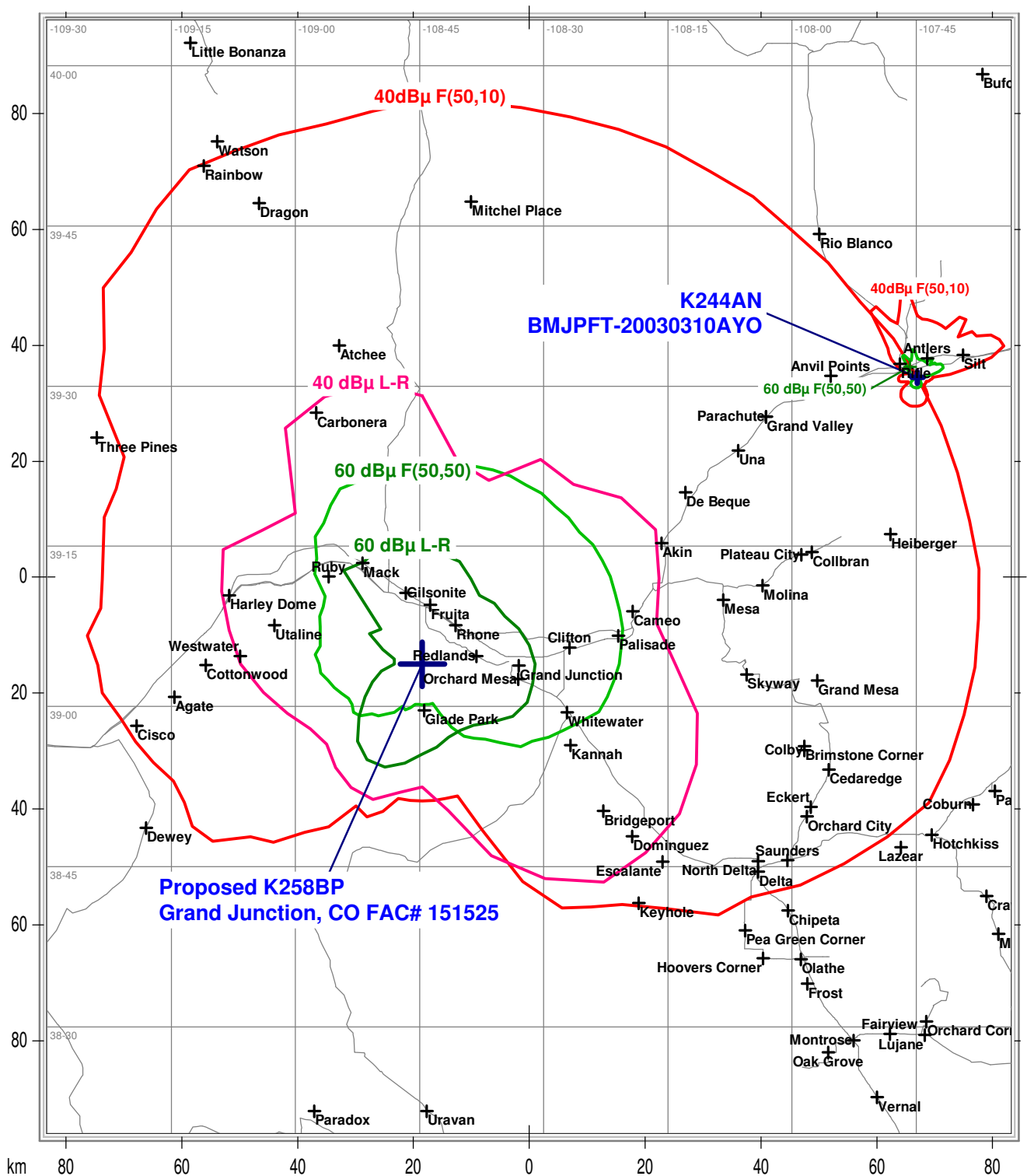
This application clearly demonstrates that the proposed K258BP will not cause any interference to K244AN. The use of Longley Rice 40dBμ contours has been justified by the ΔH values. All values and assumptions used to generate these Longley Rice contours have been demonstrated. This application clearly demonstrates that this proposal will not cause any interference to K244AN due to intervening terrain, and is therefore in compliance with 47 C.F.R § 74.1204(d).

Exhibit 12A Elevation Map Proposed K258BP and K244AN



ASR# 1226999, 9m, 250W, FMV-1, Fill-in KLFV(FM)

Exhibit 12B Longley-Rice Contour Protection Map



ASR# 1226999, 9m, 250W, FMV-1, Fill-in KLFV(FM)

Table 1. Longley Rice Data
Proposed K258BP, Grand Junction, CO FAC# 151525
9/26/2008

Site: ASR# 1226999
Coordinates: 39-03-59.0 N, 108-44-41.0 W
Freq: 99.50000 MHz
ERP: 250.00 W

Bearing	ERP W	HAAT	DH	Distance	Lat	Lon
0	250	699	690	46.58	39-29-07.1 N	108-44-41.0 W
10	250	706	820	35.58	39-22-53.5 N	108-40-22.1 W
20	250	721	1040	33.88	39-21-09.4 N	108-36-35.8 W
30	250	724	920	40.99	39-23-07.5 N	108-30-22.3 W
40	250	719	690	40.77	39-20-48.9 N	108-26-23.6 W
50	250	714	610	45.02	39-19-33.6 N	108-20-37.3 W
60	250	729	550	46.76	39-16-32.6 N	108-16-27.1 W
70	250	717	540	43.78	39-12-00.3 N	108-16-01.9 W
80	250	706	730	41.33	39-07-47.9 N	108-16-21.8 W
90	250	667	1510	44.04	39-03-55.0 N	108-14-04.4 W
100	250	613	1060	48.6	38-59-21.0 N	108-11-27.0 W
110	250	509	610	50.81	38-54-31.5 N	108-11-34.0 W
120	250	387	270	51.85	38-49-55.4 N	108-13-34.5 W
130	250	295	350	50.87	38-46-17.2 N	108-17-42.7 W
140	250	170	210	49.3	38-43-33.9 N	108-22-45.6 W
150	250	128	360	43.03	38-43-51.4 N	108-29-48.0 W
160	250	50	370	35.4	38-46-01.4 N	108-36-18.1 W
170	250	12	490	25.81	38-50-15.8 N	108-41-34.6 W
180	250	7	640	21.39	38-52-26.3 N	108-44-41.0 W
190	250	30	800	22.7	38-51-55.1 N	108-47-24.9 W
200	250	43	1120	25.05	38-51-16.7 N	108-50-37.1 W
210	250	55	1230	24.78	38-52-23.8 N	108-53-16.3 W
220	250	83	1050	23.43	38-54-17.4 N	108-55-07.5 W
230	250	120	920	21.7	38-56-26.6 N	108-56-13.1 W
240	250	121	670	22.53	38-57-53.4 N	108-58-13.5 W
250	250	135	620	25	38-59-21.0 N	109-00-59.5 W
260	250	161	550	28.04	39-01-19.7 N	109-03-51.7 W
270	250	186	550	31.59	39-03-56.9 N	109-06-38.6 W
280	250	188	470	34.01	39-07-07.9 N	109-07-58.7 W
290	250	207	360	36.98	39-10-46.0 N	109-08-52.4 W
300	250	229	330	39.83	39-14-41.3 N	109-08-43.1 W
310	250	350	290	36.15	39-16-29.7 N	109-03-59.2 W
320	250	495	430	34.13	39-18-04.5 N	108-59-58.9 W
330	250	580	370	47.27	39-26-03.3 N	109-01-11.8 W
340	250	640	640	49.31	39-28-58.8 N	108-56-28.5 W
350	250	648	690	49.51	39-30-17.7 N	108-50-41.8 W

Table 2.
ComStudy Settings Used to Generate 40 dBμ Longley- Rice Contour
Proposed K258BP, Grand Junction, CO FAC# 151525
9/25/2008

Field Strength Site Matrix Setup

Propagation Model:	Longley-Rice
Confidence:	50%
Resolution:	15" ~ 500 m
Receiver height:	2.0 m
Mobile Tx Power:	10.0 w
Mobile Tx Gain:	0.0 dB
Terrain Spacing:	.20 km
Radio Earth Curvature k	1.333
Land use attenuation:	Yes
Talk out matrix:	Yes
Time:	50%
Location:	50%
Conductivity (S/m):	.0050
Dielectric Constant:	15.000
Climate Zone:	Continental Temperate
Service Application:	Broadcast

Contour Setup

Contour:	Matrix Based 40 dBμ
Matrix Type:	Talk Out
Contour Type:	Median
Radials:	36 @ 10°
Interpolation:	None