

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317FNJ

Channel: 285

Description of Exhibit 12 Contents

This exhibit demonstrates that the proposed facility complies with contour overlap and interference protection provisions in all the applicable rule sections and that this application for a construction permit is in full compliance with 47 CFR 74.1204.

Page 2 of this exhibit is an explanation of the tabulated data, which is included as evidence on page 4 of this exhibit.

Page 3 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference protection provisions based on 47 CFR 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, lack of population or such other factors as may be applicable."

In addition, page 3 includes a tabulation of the second and third adjacent stations which this application is required to protect and the field strengths of those stations in the vicinity of the proposed translator. The field strengths given were based on contours predicted using FCC contour algorithms and 3 arc second terrain data.

Let it be noted that should any actual real world interference occur, the applicant certifies that it will promptly suspend operation of this translator in accordance with 47 CFR 74.1203.

Page 4 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application had to consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

Page 5 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 min quadrangle at full scale with the calculated area of interference overlayed. 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 a free-space calculation (see FCC 98-117, Appendix A, pg. 41 for reference to the equation used).

Explanation of Frequency Finder Results

The interference analysis for this application was performed using the "Frequency Finder" module in RadioSoft's Comstudy, version 2.2.

Frequency Finder analyzes data taken directly from the FCC's FM database and looks for prohibited overlap with contours of adjacent stations and prohibited proximity to stations 53 or 54 channels from the proposed station (IF) using 3 arc second terrain data and the FCC's contour algorithms. The results tabulated are the stations returned from that analysis. (Note: Because Comstudy was looking at the FCC's FM database, it took into account the proposed translator when doing the analysis and returned it in the tabulated results. For the sake of simplicity, that record has been deleted from all tabulated results.)

The first several columns of the table are self-explanatory. They give various data on the stations in question. The column labeled "Clr" gives the proposed translator's "clearance" with respect to the tabulated station, either in dB or km. The values listed with no units are given in km and are for stations located on an IF to the proposed site's channel.

A negative value in the "Clr" column does NOT necessarily represent prohibited contour overlap, as explained below.

A negative value listed in the "Clr" column would indicate either overlap of interference and protected contours or prohibited proximity to an IF station except in the following situations:

- A second or third adjacent LP100 station cannot represent a violation of the CFR, as 47 CFR 74.1204(a)(4) requires protection of only co-channel and first adjacent LP100 stations.

- 47 CFR 74.1204(a) requires only the protection of "AUTHORIZED commercial or noncommercial educational FM broadcast stations, FM translators, ..." Any entry with a status listed as "RSV," "USE" or "APP" does not represent an authorized station and therefore is not protected under 47 CFR 74.1204. The one exception is the case of LP100 applications. The note to 47 CFR 74.1204(a)(4) states that "LPFM applications and permits that have not yet been licensed must be considered as operating with the maximum permitted facilities." Therefore, any first adjacent or co-channel LP100 station, no matter the status, is protected.

- Entries highlighted in red are those stations where there is overlap of predicted contours and lack of population has been demonstrated within the area of interference.

Compliance with 47 CFR 74.1204(d)

The proposed translator's Maximum Effective Radiated Power (ERP) is 0.14kW at 115 meters above ground level. According to 47 CFR, 74.1204(a), the desired to undesired ratio between 2nd/3rd adjacent stations is 40dB, making the proposed translator's interfering contour 102.6dBu F(50,10).

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), this proposed translator's F(50,10) interference contour was calculated and plotted on the pertinent portion of a USGS quadrangle (page 5 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the calculated area of interference (Note: FCC 02-244, II, A, 6 states that USGS quadrangles are sufficient for demonstrating lack of population). Hence, in accordance with 47 CFR 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 therefore this application is in full compliance with 47 CFR 74.1204.

CORAGL: 115m

Maximum ERP: 0.14kW

F(50,10) Interfering Contour: 102.6dBu

F(50,10) Max Distance: 615.3m

Antenna Manufacturer: SCA

Antenna Model: CA5-FM/CP

Antenna Rotation: 190

The F(50,50) signal strength of all relevant second and third adjacent stations have been examined, and are tabulated below. Column three shows the station's signal level at the proposed translator's tower site, and column four gives the minimum value within the entire proposed translator's standard F(50,10) contour (100 dBu for most classes, 94 dBu for class B's, 97 dBu for class B1's). For signal levels too great to determine, 999 was entered. The minimum F(50,50) contour within the proposed translator's standard F(50,10) contour was used to calculate the proposed translator's interference contour, thereby assuring a minimum undesired-to-desired ratio of 40dB for all relevant adjacent stations, as required in 47 CFR, 74.1204(a).

FCC File Number	Call Sign	F(50,50) Contour at Tower	Min. F(50,50) Contour
BLH19850501KY	KMYZ-FM	76.8dBu	76.3dBu
BLH19960606KD	KJMM	63.1dBu	62.6dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			62.6dBu

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
KMYZ-FM	OK	PRYOR	283	70000	SHAMROCK COMMUNICATIONS, INC.	BLH19850501KY	C1	LIC	37.41	-17.31 dB	59979
KJMM	OK	BIXBY	287	10000	KJMM, INC.	BLH19960606KD	C2	LIC	42.54	-3.57 dB	35015
KRIG-FM	OK	NOWATA	285	15000	KCD ENTERPRISES, INC.	BLH19971022KB	C3	LIC	107.08	10.21 dB	35535
KREK	OK	BRISTOW	285	5000	BIG CHIEF B/CSTING CO OF BRISTOW	BLH19960405KC	A	LIC	105.36	11.60 dB	5218
K285CN	AR	FORT SMITH	285	280	FRED BAKER, JR.	BLFT19870804TG	D	LIC	98.37	14.64 dB	22385
KXNA	AR	SPRINGDALE	285	2750	BUTLER BROADCASTING COMPANY, L	BLH19921113KB	A	LIC	115.1	16.87 dB	71703
KREK	OK	BRISTOW	285	0	BIG CHIEF B/CSTING CO OF BRISTOW INC		A	USE	105.36	20.00 dB	5218
KXNA	AR	SPRINGDALE	285	0	BUTLER BROADCASTING COMPANY, LLC		A	USE	97.95	19.38 dB	71703
K285AY	AR	HAVANA	285	76	FRED H. BAKER, JR.	BLFT19820129IK	D	LIC	165.34	21.56 dB	22405
KRBK	AR	BOONEVILLE	284	50000	PHARIS BROADCASTING, INC.	BMLH20020306AAC	C2	LIC	129.32	23.66 dB	71701
NEW	MO	NEOSHO	285	250	COMMUNITY BROADCASTING, INC.	BNPFT20030312BCR	D	APP	140.12	23.41 dB	141952
KRIG-FM	OK	NOWATA	285	0	KCD ENTERPRISES, INC.		C3	USE	120.26	23.07 dB	35535
KTMC-FM	OK	MCALESTER	286	1600	BOTTOM LINE BROADCASTING, INC.	BLH19990517KA	A	LIC	102.83	26.34 dB	67592
KMYZ-FM	OK	PRYOR	283	0	SHAMROCK COMMUNICATIONS, INC.		C1	USE	37.41	27.28 dB	59979
	OK	MULDROW	286	0		RM10643	A	APP	74.32	27.10 dB	0
K232BI	OK	TAHLEQUAH	232	50	BRIAN DODGE	BLFT19840305MH	D	LIC	28.58	28.6	6777
KTMC-FM	OK	MCALESTER	286	0	BOTTOM LINE BROADCASTING, INC.		A	USE	107.1	34.65 dB	67592
WWLS-FM	OK	BETHANY	285	6000	CITADEL BROADCASTING COMPANY	BLH19980219KB	A	LIC	213.93	34.10 dB	6509
KSLE	OK	WEWOKA	284	1700	ONE TEN BROADCASTING GROUP, INC	BLH19971211KC	A	LIC	140.99	35.74 dB	77278
	OK	BROKEN BOW	285	0		RMbg-94*	A	APP	202.72	37.77 dB	0
	OK	BROKEN BOW	285	0		RM10224	A	APP	202.72	37.77 dB	0
KRBK*	AR	BOONEVILLE	284	0		FM ALLOTMENT	C2	USE	129.32	39.27 dB	95911
WWLS-FM	OK	BETHANY	285	0	CITADEL BROADCASTING COMPANY		A	USE	213.85	39.46 dB	6509
KOSP	MO	WILLARD	286	50000	MW SPRINGMO, INC.	BLH19940602KB	C2	LIC	206.08	39.71 dB	35427
880602NC	OK	BIXBY	287	0	BETTY ANN DEMAREE		C2	USE	52.65	39.76 dB	5027
KKFC	OK	COALGATE	288	20000	WOODSTONE BROADCASTING, INC.	BLH20020607AAB	C3	LIC	162.28	39.82 dB	82533

