

[Exhibit 12]

## **Non-Interference Compliance**

Regarding FCC File Number: BNPFT-20030317HUY

Channel: 232

### **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 5 of this exhibit.

Pages 3 and 4 of this exhibit contain 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 4 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 5 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 6 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:

- Since the proposed station's Effective Radiated Power (ERP) is 19 watts, a negative value in km (no units listed in the table) does not represent a violation of the CFR, according to 47 CFR 1204(g), which states that "FM translator stations and booster stations operating with less than 100 watts ERP will be treated as class D stations and will not be subject to intermediate frequency separation requirements."

- 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 0.019kW at 85 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 101.1dBu F(50,10). (See the next page for more discussion on the determination of the signal strength of the proposed translator's area of interference.)

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), the proposed translator's F(50,10) interference contour was calculated and the maximum horizontal plane was plotted on the pertinent portion of a USGS quadrangle (page 6 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 below 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 (equation referenced in FCC 98-117, Appendix A, pg. 41), the vertical ground clearance of the proposed application's F(50,10) interference contour at each angle has been tabulated. As shown below, the area of interference clears the ground by 28.3 meters 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 proposed area of interference. 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), there is a lack of population within the proposed area of interference and therefore this application is in full compliance with 47 CFR 74.1204.

**Antenna Manufacturer:** SWR

**Maximum ERP:** 19 watts

**Antenna Model Number:** 3FM1-0.5

**CORAGL:** 85 m

**F(50,10) Contour:** 101.1 dBu

Depression Angle (from COR)	Antenna Relative Field	ERP (watts)	Distance to F(50,10) Interfering Contour from Antenna (m)	Horizontal Distance of F(50,10) Interfering Contour from Tower (m)	Vert. Clearance of F(50,10) Interfering Contour above TGL (m)
5	0.972	17.95	261.8	260.8	62.2
10	0.891	15.08	240.0	236.4	43.3
15	0.767	11.18	206.6	199.6	31.5
20	0.615	7.19	165.7	155.7	28.3
25	0.452	3.88	121.8	110.4	33.5
30	0.293	1.63	78.9	68.4	45.5
35	0.151	0.43	40.7	33.3	61.7
40	0.035	0.02	9.4	7.2	78.9
45	0.052	0.05	14.0	9.9	75.1
50	0.109	0.23	29.4	18.9	62.5
55	0.141	0.38	38.0	21.8	53.9
60	0.151	0.43	40.7	20.3	49.8
65	0.146	0.41	39.3	16.6	49.4
70	0.131	0.33	35.3	12.1	51.8
75	0.11	0.23	29.6	7.7	56.4
80	0.085	0.14	22.9	4.0	62.4
85	0.059	0.07	15.9	1.4	69.2
90	0.033	0.02	8.9	0.0	76.1

Minimum F(50,10) Clearance above TGL **28.3 m**

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
BLH19901029KC	WMTM-FM	64.4dBu	64.2dBu
BLH19960401KA	WDEC-FM	61.4dBu	61.1dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			<b>61.1dBu</b>

# Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
WMTM-FM	GA	MOULTRIE	230	100000	COLQUITT BROADCASTING COMPANY	BLH19901029KC	C1	LIC	51.48	-4.72 dB	12381
WDEC-FM	GA	AMERICUS	234	25000	SUMTER BROADCASTING CO., INC.	BLH19960401KA	C3	LIC	39.58	-1.70 dB	63786
NEW	GA	CORDELE	232	250	LAMAD MINISTRIES	BNPFT20030314ALD	D	APP	45.17	5.79 dB	138407
NEW	GA	ALBANY	286	13	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030313BBE	D	APP	6.64	6.6	139699
NEW	GA	CAMILLA	232	13	RADIO ASSIST MINISTRY, INC	BNPFT20030317HWY	D	APP	46.08	9.46 dB	151751
NEW	GA	AMERICUS	232	10	RADIO ASSIST MINISTRY, INC	BNPFT20030317HVS	D	APP	52.75	11.37 dB	151743
WTNT-FM	FL	TALLAHASSEE	235	98000	CLEAR CHANNEL BROADCASTING LIC	BLH19840106AE	C1	LIC	112.36	17.21 dB	51590
WIZB	AL	ABBEVILLE	232	19500	CELEBRATIONS COMMUNICATIONS C	BLH19961001KB	C3	LIC	112.68	21.51 dB	23615
NEW	GA	MONTEZUMA	232	10	RADIO ASSIST MINISTRY, INC	BNPFT20030317IDR	D	APP	78.96	21.46 dB	151772
WIZB	AL	ABBEVILLE	232	0	CELEBRATIONS COMMUNICATIONS COMPANY, INC.		C3	USE	90.06	26.68 dB	23615
WPEZ	GA	JEFFERSONVILLE	229	100000	CUMULUS LICENSING CORP.	BLH20020529ABR	C1	LIC	139.75	26.10 dB	52551
WPEZ	GA	JEFFERSONVILLE	229	100000	CUMULUS LICENSING CORP.	BLH20020529ABR	C1	LIC	139.75	26.10 dB	52551
WPEZ	GA	JEFFERSONVILLE	229	100000	CUMULUS LICENSING CORP.	BLH20020529ABR	C1	LIC	139.75	26.10 dB	52551
WBYZ	GA	BAXLEY	233	100000	SOUTH GEORGIA BROADCASTERS, INC	BLH19880719KA	C	LIC	159.42	26.33 dB	61095
WRJM-FM	AL	GENEVA	229	100000	STAGE DOOR DEVELOPMENT, INC.	BLH19920526KA	C1	LIC	185.4	33.65 dB	62206
NEW	AL	LADONIA	232	13	RADIO ASSIST MINISTRY, INC	BNPFT20030317CRY	D	APP	134.44	34.12 dB	150831
NEW	GA	JEFFERSONVILLE	232	10	AUGUSTA RADIO FELLOWSHIP INSTIT	BNPFT20030310ACD	D	APP	140.63	35.43 dB	138327
NEW	GA	THOMASVILLE	233	38	EDGEWATER BROADCASTING INC.	BNPFT20030317DVT	D	APP	78.81	35.10 dB	146161
NEW	GA	THOMASVILLE	233	38	EDGEWATER BROADCASTING INC.	BNPFT20030317DVR	D	APP	78.81	35.10 dB	148551
WNFB	FL	LAKE CITY	232	50000	NEWMAN MEDIA, INC.	BLH19891212KC	C2	LIC	199.96	37.87 dB	2877
WFBX	FL	PARKER	233	100000	CLEAR CHANNEL BROADCASTING LIC	BMLH19960322KF	C	LIC	224.25	37.84 dB	61262
NEW	GA	LUMPKIN	231	10	AUGUSTA RADIO FELLOWSHIP INSTIT	BNPFT20030310AAW	D	APP	83.3	37.01 dB	138251
WDEC-FM	GA	AMERICUS	234	0	SUMTER BROADCASTING CO., INC.		C3	USE	47.95	37.74 dB	63786
NEW	AL	MONTGOMERY	232	250	RADIO ASSIST MINISTRY INC.	BNPFT20030317BWO	D	APP	218.79	39.21 dB	141837
NEW	GA	DAWSON	286	19	EDGEWATER BROADCASTING INC.	BNPFT20030317DQS	D	APP	39.2	39.2	150280
NEW	AL	KILBY	232	250	CAPSTAR TX LIMITED PARTNERSHIP	BNPFT20030314BOJ	D	APP	216.35	39.30 dB	138535



3501

3500

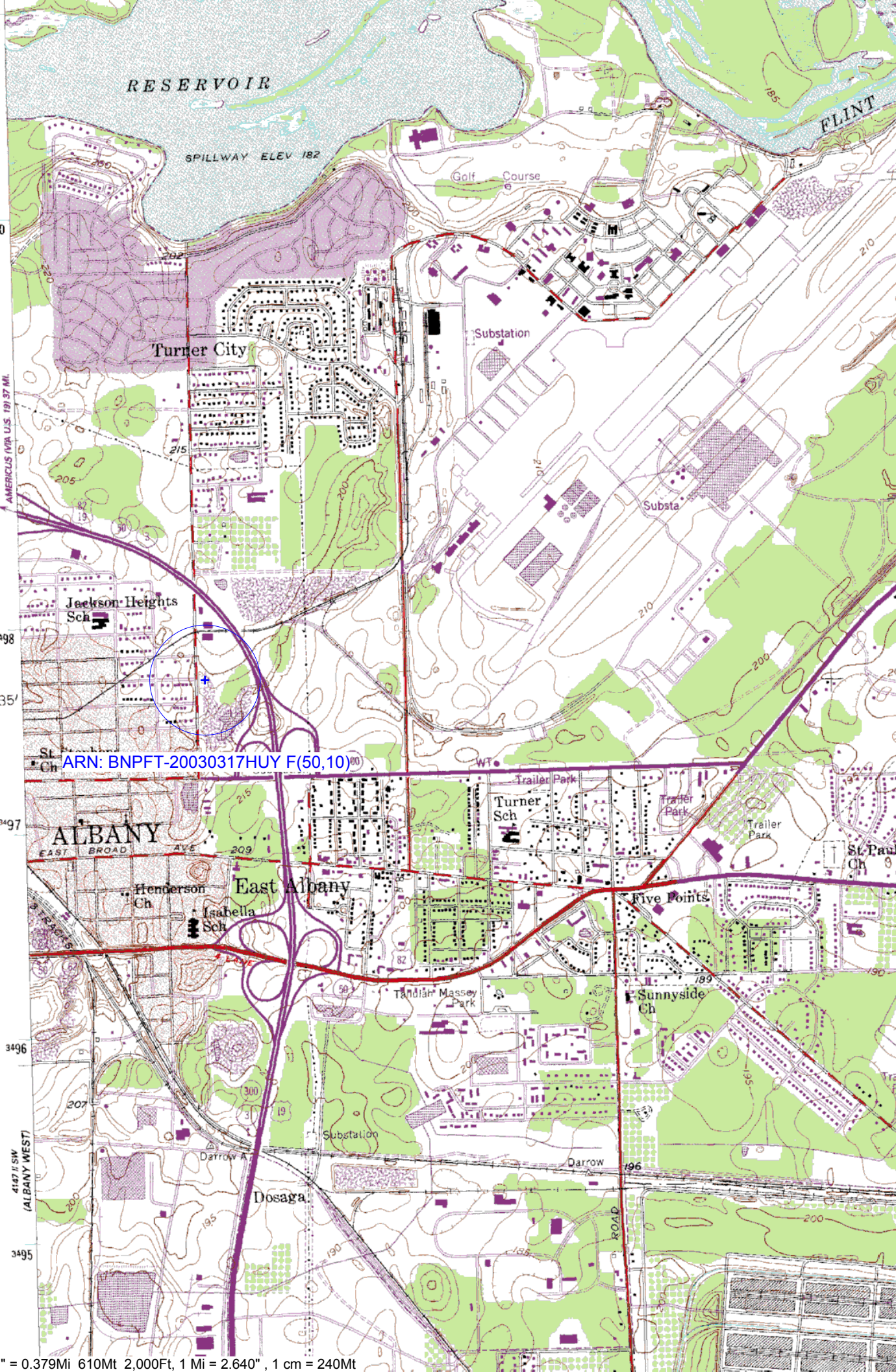
3498

350

3497

3496

3495



RESERVOIR

SPILLWAY ELEV 182

FLINT

Golf Course

Turner City

Substation

Jackson Heights Sch

Substa

ARN: BNPFT-20030317HUY F(50,10)

ALBANY

EAST BROAD AVE

Henderson Ch

East Albany

Isabella Sch

Trailer Park

Turner Sch

Trailer Park

Trailer Park

St. Paul Ch

Five Points

Sunnyside Ch

Tandian Massey Park

Substation

Darrow A

Dosaga

Darrow

4147 ft SW (ALBANY WEST)