

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317CJV

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 3 of this exhibit.

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

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.

Since the proposed translator is 259.5 km from the Mexican border, 47 CFR 74.1235(d) has been taken into account and this applicant certifies that in the direction of the Mexican border, the proposed translator's 60 dBu F(50,50) contour does not lie within 116.3 km of the Mexican border. This application is therefore in full compliance with 47 CFR 74.1235(d)(2), which states that for translators between 125 and 320 km from the border, "in no event shall the location of the 60 dBu contour lie within 116.3 km of the Mexican border," and hence complies with 47 CFR 74.1204(h).

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 35 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.

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
	CA	BARSTOW	267	0		RMspm120	A	APP	1.62	-56.92 dB	0
DKCWM	CA	BARSTOW	217	0	COMMUNITY EDUC. TELEVISION, INC.		A	APP	1.83	-8.2	12899
NEW	CA	VICTORVILLE	267	100	IGLESIA DE CRISTO VICTORVILLE	BNPL20000608ABW	LP100	APP	7.02	1.10 dB	124670
KZXY-FM	CA	APPLE VALLEY	272	6000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19920428KB	A	LIC	57.43	5.81 dB	57920
KSCA	CA	GLENDALE	270	4800	HBC LICENSE CORPORATION	BXMLH20021025ABH	B	APP	121.83	10.82 dB	24548
KSCA	CA	GLENDALE	270	4800	HBC LICENSE CORPORATION	BLH19960228KA	B	LIC	121.81	11.47 dB	24548
KSCA	CA	GLENDALE	270	3000	HBC LICENSE CORPORATION	BXPH20020812ACN	B	CP	121.79	12.62 dB	24548
KSCA	CA	GLENDALE	270	1750	HBC LICENSE CORPORATION	BLH19990519KE	B	LIC	121.83	13.70 dB	24548
KSCA	CA	GLENDALE	270	1300	HBC LICENSE CORPORATION	BLH19901030KA	B	LIC	121.83	13.70 dB	24548
KIXF	CA	BAKER	268	4300	HIGHWAY RADIO, INC.	BLH19940505KE	B	LIC	116.21	15.90 dB	68412
KXSB	CA	BIG BEAR LAKE	269	300	LAZER BROADCASTING CORPORATIOI	BLH19951010KB	A	LIC	78.97	19.47 dB	43999
KZXY-FM	CA	APPLE VALLEY	272	0	CAPSTAR TX LIMITED PARTNERSHIP		A	USE	57.43	21.88 dB	57920
NEW	CA	BIG BEAR	271	13	LIVING PROOF, INC.	BNPFT20030312ACB	D	APP	74.33	24.58 dB	138855
KSCA	CA	GLENDALE	270	0	HBC LICENSE CORPORATION		B	USE	121.81	26.51 dB	24548
KXSB	CA	BIG BEAR LAKE	269	0	LAZER BROADCASTING CORPORATION		A	USE	78.97	28.41 dB	43999
NEW	CA	WOFFORD HEIGHTS	270	250	RADIO ASSIST MINISTRY INC.	BNPFT20030317COY	D	APP	157.58	29.58 dB	150652
KDUQ	CA	LUDLOW	273	6000	DOS COSTAS COMMUNICATIONS COR	BMLH20010517AAX	A	LIC	81.5	31.84 dB	21497
KWTH	CA	BARSTOW	217	1500	LIVING PROOF INC	BPED19970609MG	B	CP	47.25	32.2	87122
NEW	CA	HESPERA	268	100	CENTRO CRISTIANO DE FE, INC.	BNPL20000605ALK	LP100	APP	59.49	32.12 dB	124583
K270AI	CA	CATHEDRAL CITY	270	10	EDUCATIONAL MEDIA FOUNDATION	BPFT20020329ADL	D	CP	128.18	32.51 dB	88469
	CA	RANDSBURG	271	0		RMspm125	A	APP	76.44	35.33 dB	0
KWID	NV	LAS VEGAS	270	100000	CITICASTERS LICENSES, L.P.	BMLH20020307AAA	C	LIC	220.24	36.30 dB	55503
NEW	CA	VICTORVILLE	268	100	CENTRO CRISTIANO DE FE, INC.	BNPL20000605AAR	LP100	APP	56.35	37.02 dB	123880
KPRI	CA	ENCINITAS	271	14500	COMPASS RADIO OF SAN DIEGO, INC.	BPH20000313ABB	B	CP	200.42	38.57 dB	51503
KPRI	CA	ENCINITAS	271	14500	COMPASS RADIO OF SAN DIEGO, INC.	BLH19991101AFS	B	LIC	200.42	38.57 dB	51503
NEW	CA	ADELANTO	268	100	CALVARY CHAPEL COMMUNITY CHURCH	BNPL20000605AGY	LP100	APP	55.02	39.76 dB	124322