

## Exhibit 12

### Interference Analysis Overlap Requirements

According to CFR 47 §74.1204(a), translators are required to protect all authorized FM facilities from interference due to overlap of the protected contours of the authorized facilities with the interfering contours of the new translators.

#### US Facilities

In the attached tabular printout, only KJKK and KPLX have outgoing contour overlaps from the proposed translator, so no interference to other stations is anticipated. Incoming overlap is not prohibited. Translator applications 636217 and 629500, which are not ‘authorized’ (they have never been accepted for filing) are nevertheless protected from both incoming and outgoing interference, as demonstrated in the maps.

KJKK and KPLX are both second adjacent to the proposed translator, and, according to §74.1204(d),

**“The provisions of this section concerning prohibited overlap will not apply where 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 ... lack of population ... .”**

The F(50,50) signal from KJKK at the transmit site of the translator is 85.76 dBu.

The F(50,50) signal from KPLX at the transmit site of the translator is 84.76 dBu.

The weaker and thus more fragile station is KPLX, so protection sufficient for it will suffice for the other. A 40 dB ratio of undesired to desired signal strength gives an allowable interfering F(50,10) field strength of 124.76 dBu.

The screenshot shows the 'FCC Curves' software window. It has a blue title bar with a globe icon and standard window controls. The interface is divided into three main sections: 'Contour', 'Units', and 'Band'. In the 'Contour' section, 'F(50,10) Interfering' is selected with a radio button. In the 'Units' section, 'Metric Units' is selected. In the 'Band' section, 'FM-Low VHF TV' is selected. Below these sections are four input fields: 'ERP (kW)' with the value '0.053 (0)', 'HAAT (m or ft.)' with the value '76', 'Contour (dBu)' with the value '124.76', and 'Distance (km or mi.)' with the value '0.0295203'. At the bottom, there are four buttons: 'Find ERP', 'Find HAAT', 'Find Contour', and 'Find Distance'. The 'Find Distance' button is highlighted with a dashed border.

ERP (kW)	HAAT (m or ft.)	Contour (dBu)	Distance (km or mi.)
0.053 (0)	76	124.76	0.0295203

Thus for the specified ERP, this contour will only extend 29.5 meters from the antenna. The antenna is proposed for 178 meters AGL. The interfering contour clearly does not reach down to the ground. Hence §74.1204(d) quoted above applies (no population), and the predicted area of interference is acceptable to the Commission.

#### IF Separation

The proposal is fully spaced from all IF facilities (note KNON is clear by 9.98 km).