

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317ENY

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.

At the end of this exhibit are plots of the protected and interference contours of the proposed translator and any other stations from which the applicant is willing to accept interference. These contours were plotted using 3 arc second terrain data for the highest degree of accuracy possible.

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.

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 10 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.

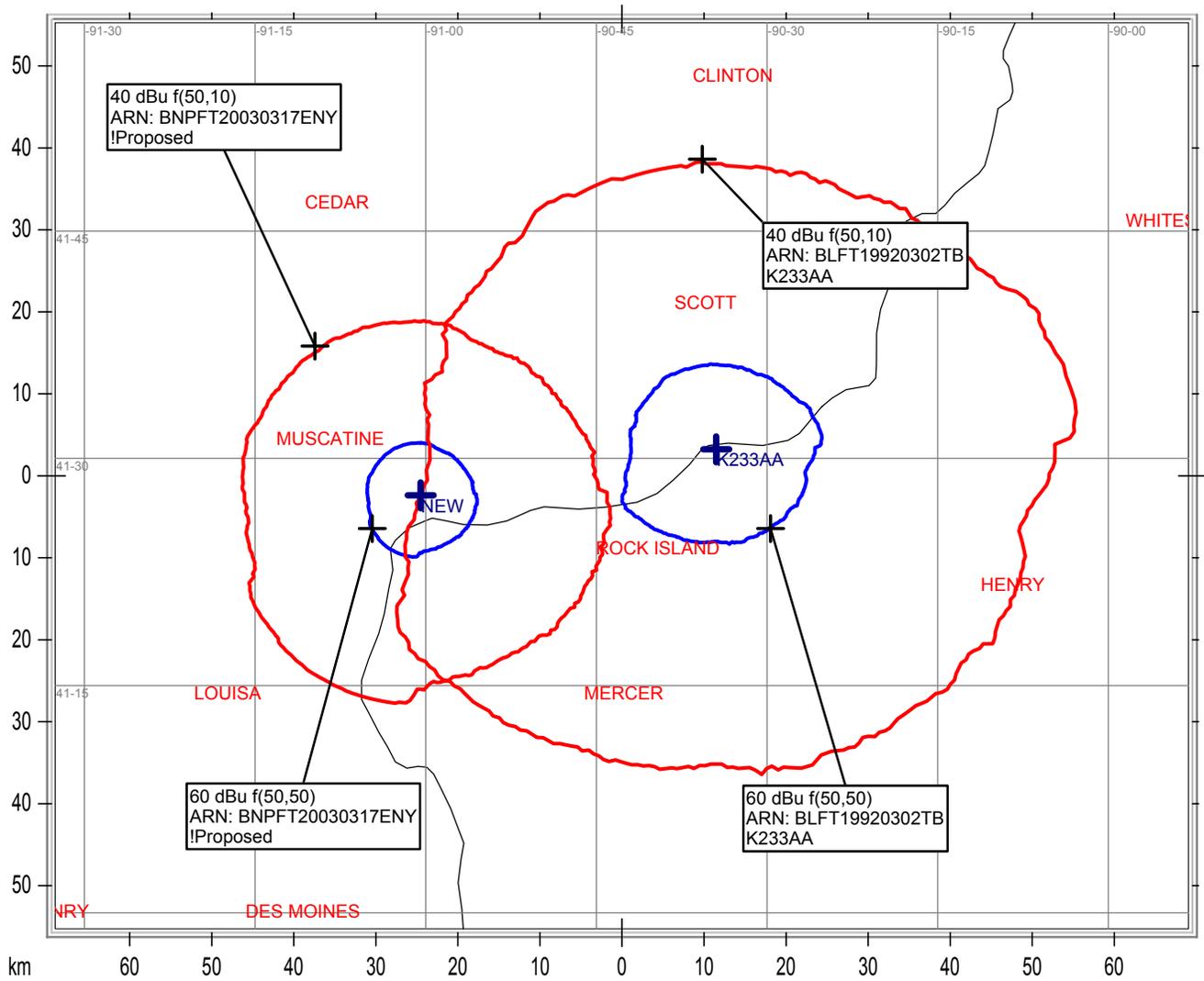
- 47 CFR 74.1204(a) requires only the protection of "AUTHORIZED commercial or noncommercial educational FM broadcast stations, FM translators, ..." Any entry with a status listed as "RSV," "USE" or "APP" does not represent an authorized station and therefore is not protected under 47 CFR 74.1204. The one exception is the case of LP100 applications. The note to 47 CFR 74.1204(a)(4) states that "LPM 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 blue are those that were returned in the results because of interference caused to this proposed translator. Contours were plotted by RadioSoft's Comstudy, version 2.2, using the FCC's contour algorithms, and these are included at the end of this exhibit showing that interference is caused only to the proposed translator and not by it.

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance km	Clr	Facility_id
K233AA	IA	DAVENPORT	233	170	UNIVERSITY OF NORTHERN IOWA	BLFT19920302TB	D	LIC	36.59	-26.41 dB	69144
KTDC-LP	IA	MUSCATINE	287	100	MUSCATINE EDUCATIONAL ASSOCIAT	BMPL20030328ARE	LP100	CP MOI	6.57	-0.4	134691
KRNA	IA	IOWA CITY	231	100000	CUMULUS LICENSING CORP.	BLH19911115KA	C1	LIC	76.38	0.92 dB	35555
NEW	IA	IOWA CITY	233	115	EDGEWATER BROADCASTING INC.	BNPFT20030317ENG	D	APP	54.39	2.79 dB	146166
NEW	IA	IOWA CITY	233	250	UNIVERSITY OF NORTHERN IOWA	BNPFT20030314CDF	D	APP	54.8	3.22 dB	144461
WAAG	IL	GALESBURG	235	50000	GALESBURG BROADCASTING CO.	BLH20010615AMM	B	LIC	79.92	5.78 dB	23038
KMAQ-FM	IA	MAQUOKETA	236	6000	MAQUOKETA BROADCASTING COMPAI	BLH19990316KC	A	LIC	76.85	22.71 dB	39857
NEW	IL	GALESBURG	233	19	EDGEWATER BROADCASTING INC.	BNPFT20030317ETB	D	APP	81.01	22.46 dB	148786
KZEG	IA	CLINTON	234	3000	WPW BROADCASTING, INC.	BLH19980909KD	A	LIC	82.14	25.87 dB	33054
NEW	IA	BURLINGTON	232	250	COVENANT NETWORK	BNPFT20030317IYM	D	APP	73.08	25.15 dB	156881
NEW	IA	BURLINGTON	232	250	COVENANT NETWORK INC.	BNPFT20030314CKH	D	APP	73.08	25.15 dB	143962
NEW	IA	BURLINGTON	232	250	AMERICAN FAMILY ASSOCIATION	BNPFT20030311ANV	D	APP	71.02	26.21 dB	142541
NEW	IL	FREEPART	233	250	CATHOLIC DIOCESE OF ROCKFORD	BNPFT20030317BHE	D	APP	147.72	27.76 dB	153179
KRXL	MO	KIRKSVILLE	233	90000	KIRX, INC.	BLH19900604KE	C	LIC	180.59	27.46 dB	34973
WYEC	IL	KEWANEE	230	3100	VIRDEN BROADCASTING CORPORATIC	BLH19961004KD	A	LIC	93.12	30.09 dB	70277
K236AA	IA	CEDAR RAPIDS	236	205	FAMILY STATIONS, INC.,	BLFT19930722TB	D	LIC	73.49	34.71 dB	20717
WSSQ	IL	STERLING	232	6000	W. RUSSELL WITHERS, JR.	BMLH19900208KA	A	LIC	116.48	34.92 dB	37208
KGGO	IA	DES MOINES	235	100000	WILKS LICENSE CO., LLC	BLH19840210AD	C	LIC	205.26	35.91 dB	12965
KMCH	IA	MANCHESTER	234	6000	FIFE COMMUNICATION COMPANY, L.C.	BLH19911227KB	A	LIC	122.7	36.22 dB	64125
NEW	IA	IOWA CITY	235	250	FRIENDSHIP COMMUNICATIONS, INC.	BNPFT20030313AJ0	D	APP	49.12	36.84 dB	144078
WQPC	WI	PRAIRIE DU CHIE	232	36000	ROBINSON CORPORATION	BLH19910814KK	C2	LIC	177.92	37.03 dB	53302
WCEZ	IL	CARTHAGE	230	6000	DANA R. WITHERS	BPH20010712ADK	A	CP	117.81	37.75 dB	79019
WOLX-FM	WI	BARABOO	235	37000	ENTERCOM MADISON LICENSE, LLC.	BLH4952	B	LIC	245.37	38.81 dB	60236
WCEZ	IL	CARTHAGE	230	6000	DANA R. WITHERS	BLH20010507AAK	A	LIC	117.81	39.52 dB	79019
KZEG*	IA	CLINTON	234	0		FM ALLOTMENT	A	USE	82.25	39.95 dB	94813

Map Header



Map Footer

— State Borders — Lat/Lon Grid