

[Exhibit 12]

## **Non-Interference Compliance**

For an Open Site

Regarding FCC File Number: BNPFT-20030317KWP

### **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.**

## **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 "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.

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
NEW	WI	NEILLSVILLE	268	10	RADIO ASSIST MINISTRY, INC	BNPFT20030317KRD	D	APP	36.69	1.18 dB	150227
NEW	WI	SPARTA	268	10	RADIO ASSIST MINISTRY, INC	BNPFT20030317KON	D	APP	41.21	2.97 dB	150274
	WI	AUGUSTA	268	0			C3	APP	37.18	7.40 dB	94401
KHME	MN	WINONA	266	5000	KAGE, INC.	BLH20001129AAL	C3	LIC	60.61	9.76 dB	27534
NEW	WI	LA CROSSE	268	100	OUR LADY OF LOURDES	BNPL20010122AFG	LP100	APP	62.72	13.69 dB	132188
NEW	WI	LA CROSSE	268	100	LA CROSSE COMMUNITY BROADCASTING, INCORPORATED	BNPL20010122AMW	LP100	APP	63.05	14.16 dB	132492
NEW	WI	NEILLSVILLE	267	10	EDGEWATER BROADCASTING INC.	BNPFT20030317MJF	D	APP	36.69	15.18 dB	155164
WDEZ	WI	WAUSAU	270	99000	W R I G, INC.	BPH20010112ACV	C	CP	116.65	16.79 dB	70522
NEW	WI	MARSHFIELD	268	27	RADIO ASSIST MINISTRY, INC	BNPFT20030317KTF	D	APP	70.84	16.53 dB	150185
WDEZ	WI	WAUSAU	270	93000	W R I G, INC.	BLH19940318KA	C	LIC	116.59	16.96 dB	70522
NEW	WI	LA CROSSE	268	100	SCHOOL DISTRICT OF LA CROSSE	BNPL20010116AFA	LP100	APP	69.41	17.08 dB	131676
NEW	WI	NEKOOSA	268	38	RADIO ASSIST MINISTRY, INC	BNPFT20030317KRA	D	APP	80.02	19.66 dB	150229
K268AF	IA	DECORAH	268	200	FAITH SOUND, INC.	BLFT19951010TE	D	LIC	131.79	23.41 dB	20572
WCWR-LP	WI	CASHTON	267	100	CASHTON COMMUNITY WELLNESS GROUP INC.	BNPL20010122ACG	LP100	CP	66.81	25.88 dB	132175
NEW	WI	MOSINEE	268	55	EDGEWATER BROADCASTING INC.	BNPFT20030317MJW	D	APP	108.04	25.59 dB	155157
WIBA-FM	WI	MADISON	268	12000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19950824KC	B	LIC	180.59	25.43 dB	17385
NEW	WI	MOSINEE	268	55	RADIO ASSIST MINISTRY, INC	BNPFT20030317KSA	D	APP	108.04	25.59 dB	150200
NEW	WI	STEVENS POINT	268	13	RADIO ASSIST MINISTRY, INC	BNPFT20030317KOG	D	APP	107.28	27.75 dB	150278
NEW	WI	MEDFORD	268	13	RADIO ASSIST MINISTRY, INC	BNPFT20030317KSJ	D	APP	102.45	28.06 dB	150190
KRCH	MN	ROCHESTER	269	39000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19911202KB	C2	LIC	144.03	29.76 dB	35527
NEW	WI	MARSHFIELD	267	27	EDGEWATER BROADCASTING INC.	BNPFT20030317MLX	D	APP	70.84	30.53 dB	155140
KDWB-FM	MN	RICHFIELD	267	100000	AMFM RADIO LICENSES, L.L.C.	BLH19910814KA	C	LIC	192.7	32.39 dB	41967
KEEY-FM	MN	ST. PAUL	271	100000	AMFM RADIO LICENSES, L.L.C.	BLH19910814KJ	C	LIC	192.7	34.10 dB	59967