

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317BXJ

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 4 of this exhibit.

Page 3 of this exhibit is 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 3 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 4 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 5 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 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.

- 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 0.01kW at 101 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 111.8dBu F(50,10).

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), this 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 5 of this exhibit). However, the proposed translator's area of interference extends a maximum of 57.0 meters from the transmit antenna. Since the translator's center of radiation is 101 meters above ground level, the area of interference will be at least 44.0 meters above tower ground level (TGL) 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.

CORAGL: 101m

Maximum ERP: 0.01kW

F(50,10) Interfering Contour: 111.8dBu

F(50,10) Max Distance: 57.0m

Antenna Manufacturer: SWR

Antenna Model: FM1

F(50,10) Clearance above TGL: 44.0m

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
BLH19880509KE	WMXC	72dBu	71.8dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Application's 100dBu F(50,10) Contour:			71.8dBu

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Facility_id	Class	Status	Distance_km	Clr
WMXC	AL	MOBILE	260	94000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19880509KE	8696	C	LIC	60.17	-12.23 dB
WKNN-FM	MS	PASCAGOULA	256	99000	CHASE RADIO PROPERTIES, L.L.C.	BLH20020226ACB	61367	C1	LIC	79.31	2.91 dB
NEW	AL	MOBILE	258	10	EDGEWATER BROADCASTING INC.	BNPFT20030317BYF	150854	D	APP	40.98	4.48 dB
NEW	AL	BAYOU LA BATRE	258	38	EDGEWATER BROADCASTING INC.	BNPFT20030317BWT	150815	D	APP	76.97	19.67 dB
WMFC-FM	AL	MONROEVILLE	257	30000	MONROE BROACASTING CO., INC.	BLH19940613KJ	43534	C2	LIC	103.28	24.95 dB
WHER	MS	HEIDELBERG	257	50000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19930114KC	52618	C2	LIC	128.93	26.16 dB
WYKK-FM	MS	QUITMAN	255	25000	QUITMAN BROADCASTING COMPANY	BLH19970827KC	54324	C3	LIC	117.19	30.29 dB
WRNO-FM	LA	NEW ORLEANS	258	100000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH19860224KD	54890	C	LIC	203.15	31.97 dB
WKSM	FL	FORT WALTON BEACH	258	50000	CUMULUS LICENSING CORP.	BPH20020815AAC	27467	C2	CP	173.17	33.33 dB
WKSM	FL	FORT WALTON BEACH	258	50000	CUMULUS LICENSING CORP.	BLH19970724KD	27467	C2	LIC	173.17	33.21 dB
NEW	AL	YORK	258	10	EDGEWATER BROADCASTING INC.	BNPFT20030317BYT	150871	D	APP	151.66	38.98 dB
WBAM-FM	AL	MONTGOMERY	255	100000	DEEP SOUTH BROADCASTING COMPANY	BLH20020625AAN	16379	C1	LIC	219.9	38.81 dB
WJMI	MS	JACKSON	259	98000	URBAN RADIO OF MISSISSIPPI, L.L.C.	BLH7788	50408	C	LIC	233.84	38.79 dB

