

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317FIM

Channel: 286

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 141 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 113.2dBu 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 48.5 meters from the transmit antenna. Since the translator's center of radiation is 141 meters above ground level, the area of interference will be at least 92.5 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: 141m

Maximum ERP: 0.01kW

F(50,10) Interfering Contour: 113.2dBu

F(50,10) Max Distance: 48.5m

Antenna Manufacturer: SWR

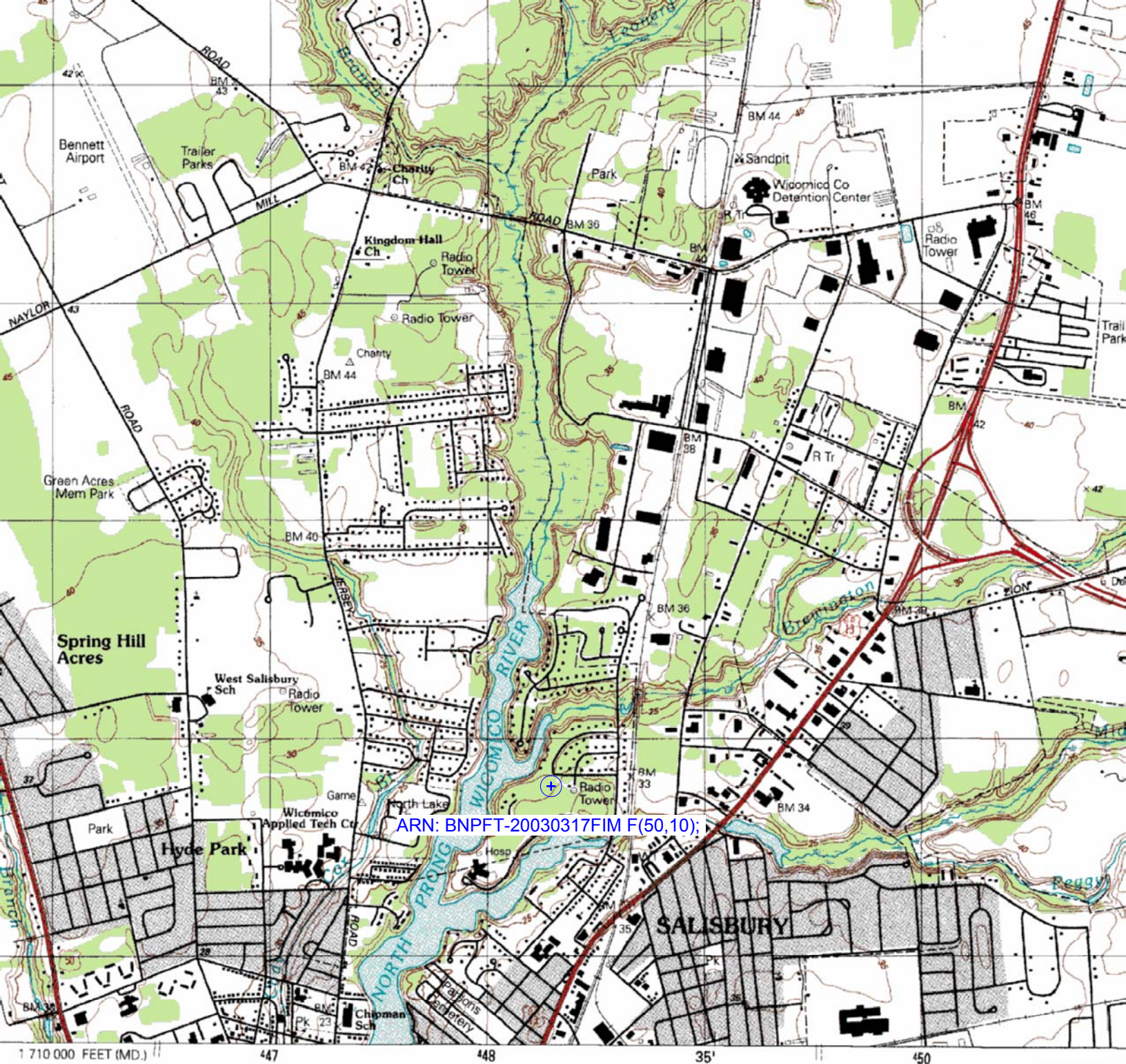
Antenna Model: FM1

F(50,10) Clearance above TGL: 92.5m

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
BLH19800505AB	WQHQ	73.7dBu	73.2dBu
BLH19870413KK	WLVW-FM	98.4dBu	95.9dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Translator's standard F(50,10) Contour:			73.2dBu

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Facility_id	Class	Status	Distance_km	Clr
WLVW-FM	MD	SALISBURY	288	2100	CAPSTAR TX LIMITED PARTNERSHIP	BLH19870413KK	28167	A	LIC	2.46	-40.80 dB
WQHQ	MD	OCEAN CITY-SALISBURY	284	33000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19800505AB	28166	B	LIC	26.27	-20.22 dB
WLVW-FM	MD	SALISBURY	288	0	CAPSTAR TX LIMITED PARTNERSHIP		28167	A	USE	2.46	-18.35 dB
NEW	DE	GEORGETOWN	286	19	EDGEWATER BROADCASTING INC.	BNPFT20030317DJU	150268	D	APP	39.29	5.57 dB
NEW	MD	OCEAN PINES	286	10	EDGEWATER BROADCASTING INC.	BNPFT20030317FIC	150318	D	APP	39.73	6.24 dB
WAVA	VA	ARLINGTON	286	50000	SALEM MEDIA OF VIRGINIA, INC.	BXPH20030418ABR	4644	B	APP	145.71	17.97 dB
WAVA	VA	ARLINGTON	286	41000	SALEM MEDIA OF VIRGINIA, INC.	BLH19891103KB	4644	B	LIC	145.71	17.04 dB
WQHQ	MD	OCEAN CITY-SALISBURY	284	0	CAPSTAR TX LIMITED PARTNERSHIP		28166	B	USE	26.27	19.85 dB
NEW	DE	WOODSIDE	286	100	POLYTECH SCHOOL DISTRICT	BNPL20010116ABZ	129414	LP100	APP	75.6	20.33 dB
WXYV	MD	CATONSVILLE	289	50000	INFINITY RADIO OPERATIONS INC.	BLH19880311KE	1916	B	LIC	133.2	23.22 dB
NEW	DE	DOVER	286	100	DELAWARE DEPARTMENT OF TRANSPORTATION	BNPL20010122AEI	131926	LP100	APP	85.94	24.20 dB
WNVZ	VA	NORFOLK	283	49000	ENTERCOM NORFOLK LICENSE, LLC	BMLH19920911KA	40755	B	LIC	162.27	29.17 dB
WIOV-FM	PA	EPHRATA	286	25000	REGENT BROADCASTING OF LANCASTER, INC.	BLH19980603KD	55308	B	LIC	204.57	31.30 dB
WSVY-FM	VA	NORFOLK	287	50000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH4836	69570	B	LIC	190.87	31.61 dB
WDAS-FM	PA	PHILADELPHIA	287	16500	AMFM RADIO LICENSES, L.L.C.	BLH19930208KK	71316	B	LIC	186.34	32.46 dB
WAVA	VA	ARLINGTON	286	0	SALEM MEDIA OF VIRGINIA, INC.		4644	B	USE	145.71	32.67 dB
NEW	MD	GRASONVILLE	287	100	LONG POINT RADIO CORP.	BNPL20000605AMM	124772	LP100	APP	66.72	32.04 dB
WNDJ	VA	WHITE STONE	285	6000	WINDMILL COMMUNICATIONS, INC.	BLH20001215AAP	72904	A	LIC	105.89	33.19 dB
WEMG-FM	NJ	EGG HARBOR CITY	285	10000	MEGA COMMUNICATIONS OF EGG HARBOR LICENSEE, L.L.C.	BLH19910726KB	57357	B1	LIC	153.13	35.20 dB
WSNI-FM	PA	PHILADELPHIA	283	16000	AMFM RADIO LICENSES, L.L.C.	BMLH19930216KA	53969	B	LIC	186.34	35.23 dB
WINX-FM	MD	CAMBRIDGE	232	21600	CWA BROADCASTING, INC.	BPH20020718ABE	14774	B1	APP	48.76	36.8
WRAR-FM	VA	TAPPAHANNOCK	288	6000	RAPPAHANNOCK COMMUNICATIONS, INC.	BLH19910812KA	55172	A	LIC	114.55	36.43 dB
WSNI-FM	PA	PHILADELPHIA	283	11000	AMFM RADIO LICENSES, L.L.C.	BMLH19880301KB	53969	B	LIC	186.34	36.11 dB
WINX-FM	MD	CAMBRIDGE	232	0	CWA BROADCASTING, INC.		14774	A	USE	47.09	37.1
WGBZ	NJ	CAPE MAY COURT HOUSE	288	3300	EQUITY COMMUNICATIONS, L.P.	BMLH19900117KE	40031	A	LIC	105.86	37.19 dB
WINX-FM	MD	CAMBRIDGE	232	4600	CWA BROADCASTING, INC.	BLH19990715KB	14774	A	LIC	48.76	38.8
NEW	DE	ROXANNA	232	80	AIRPORT INVESTORS L.P.	BNPFT20030317CDD	155491	D	APP	39.15	39.2



Map by the United States Geological Survey

USGS and NOS/NOAA

from aerial photographs taken 1989

and 1991. Map edited 1992

North American Datum of 1983 (NAD 83). Projection and

grid: Universal Transverse Mercator, zone 18

Grid ticks: Maryland and Delaware

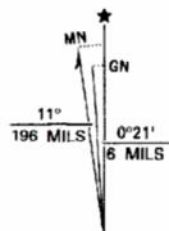
systems of 1983

Distance between NAD 83 and North American Datum

(NAD 27) for 7.5-minute intersections is given

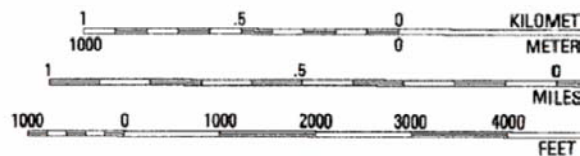
in Bulletin 1875. The NAD 27 is shown by dashed

lines. Areas in which only landmark buildings are shown



UTM GRID AND 1992 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:



CONTOUR INTERVAL
NATIONAL GEODETIC VERTICAL

(TO CONVERT ELEVATIONS TO THE NORTH AMERICAN DATUM)

THIS MAP COMPLIES WITH NATIONAL
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER,
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND