

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 152369

Channel 279

### **Description of Exhibit 12 Contents**

This exhibit demonstrates that the proposed facility complies with contour overlap and interference protection provisions in all of the applicable rule sections and that this application for a construction permit is in full compliance with 47 C.F.R. § 74.1204.

**Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.**

Page 2 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference provisions based on 47 C.F.R. § 74.1204(d), which states:

*[A]n 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.*

Page 3 contains a tabulation of the vertical radiation pattern of the proposed antenna and the minimum ground clearance of the interfering contour based on this pattern.

Pages 4 through 6 include a plot and a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 7 of this exhibit contains the tabulated data from the interference analysis, which shows all stations whose protected contours come within 50 km of the 34 dBμ F(50,10) contour of the proposed translator. These tabulated values were calculated using data from the FCC's CDBS files and 30 arc second terrain data. The column labeled "Adj" shows the number of channels difference between the entry and the proposed translator. The column labeled "Dist" shows the distance in km. The column labeled "Overlap" shows the area of contour overlap in square kilometers.

Page 8 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 minute quadrangle at full scale with the calculated area of interference overlaid. 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 the free space equation and 120 radials.

## Compliance with 47 C.F.R. § 74.1204(d)

All authorized second and third adjacent stations with which the proposed translator has contour overlap are tabulated below. Column four show the station's signal level at the proposed translator's tower site, and column five gives the minimum value within the entire standard interfering contour of the proposed translator (100 dB $\mu$  for most classes, 94 for class B, 97 for class B1). The minimum second or third adjacent F(50,50) contour within the proposed translator's standard interfering contour was used to calculate the proposed translator's actual "worst-case" interfering contour.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1154466	BLED20061019AAQ	WVGR	65.8	65.8
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>65.8</b>

FCC 02-244 at Section II.A.5 states that "when demonstrating that 'no actual interference will occur due to . . . other factors,' pursuant to Section 74.1204(d), an applicant may use the undesired-to-desired signal ratio method." The undesired-to-desired ratio for second and third adjacent stations required by § 74.1204(a) is 40 dB. Since the minimum protected contour strength within the proposed translator's standard interference contour is **65.8 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **105.8 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **67.3 m** from the transmit antenna.

The maximum horizontal plane of the interfering contour was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 8 of this exhibit). However, the field strength of the proposed translator's antenna varies with angle of depression from horizontal. The antenna relative fields are tabulated on the following page at 5 degree increments, starting at 5 degrees below horizontal. Antenna relative field strength data was provided and certified by the manufacturer of the proposed antenna. Using a free-space calculation that neglects any loss due to reflection, the vertical ground clearance of the proposed translator's interference contour has been tabulated. As shown on the following page, the area of interference clears the tower ground level (TGL) by **10.5 m** 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 area of interference. Hence, in accordance with 47 C.F.R. § 74.1204(d) and the clarification provided by the FCC in the decision *Re: Living Way Ministries* (FCC 02-244), a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

**Antenna Manufacturer:** ERI  
**Antenna Model:** 100-1  
**CORAGL:** 46 m  
**Maximum ERP:** 0.0035 kW  
**Interfering Contour:** 105.8 dB $\mu$   
**Max Int. Contour Distance:** 67.3 m  
**Min Ground Clearance:** 10.5 m

Depression Angle Below Horizontal	Antenna Relative Field	ERP (watts)	Distance to Interfering Contour from Antenna (m)	Horizontal Distance of Interfering Contour from Tower (m)	Vertical Clearance of Interfering Contour above TGL (m)
5	.997	3.5	67.1	66.8	40.2
10	.987	3.4	66.4	65.4	34.5
15	.970	3.3	65.3	63.1	29.1
20	.947	3.1	63.7	59.9	24.2
25	.918	2.9	61.8	56.0	19.9
30	.883	2.7	59.4	51.5	16.3
35	.842	2.5	56.7	46.4	13.5
40	.796	2.2	53.6	41.0	11.6
45	.744	1.9	50.1	35.4	10.6
50	.688	1.7	46.3	29.8	10.5
55	.627	1.4	42.2	24.2	11.4
60	.563	1.1	37.9	18.9	13.2
65	.495	0.9	33.3	14.1	15.8
70	.425	0.6	28.6	9.8	19.1
75	.352	0.4	23.7	6.1	23.1
80	.278	0.3	18.7	3.2	27.6
85	.202	0.1	13.6	1.2	32.5
90	.126	0.1	8.5	0.0	37.5
Minimum Clearance above TGL:					<b>10.5 m</b>

**PRELIMINARY SPECIFICATION FOR  
ERI 100 CIRCULARLY POLARIZED  
FM BROADCAST ANTENNA**

*Prepared For  
erii  
Channel 201*

*May 25, 2006*

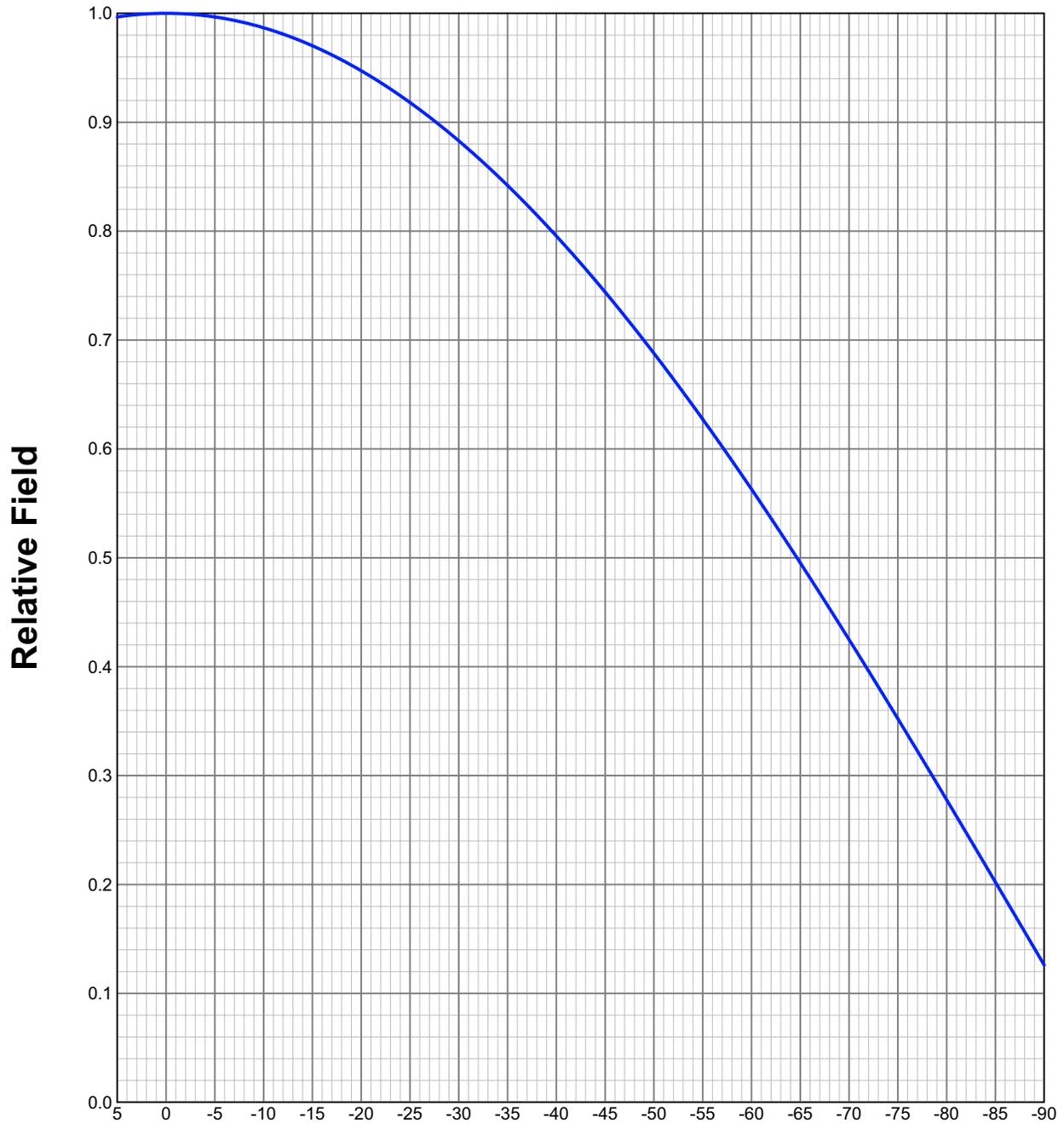
**ANTENNA TYPE:  
101-1(F)**

**SPECIFICATION NO:**



### ELEVATION PATTERN

Type:	1001F		Channel:	201
Directivity:	Numeric	dBd	Location:	
Main Lobe:	0.41	-3.82	Beam Tilt:	0.00
Horizontal:	0.41	-3.82	Polarization:	Circular



## TABULATED DATA FOR ELEVATION PATTERN

Type: 1001F

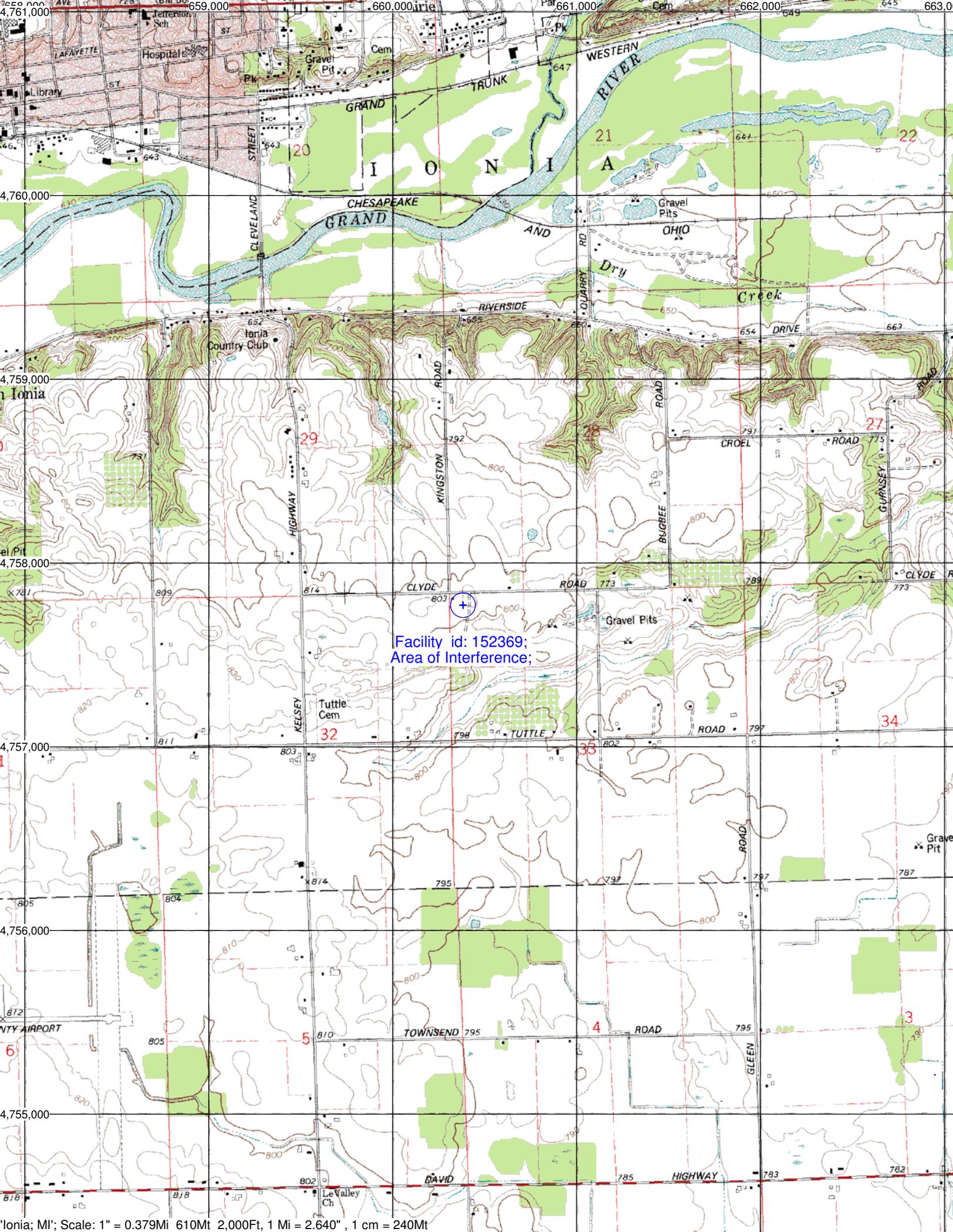
Polarization: Circular

ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB					
5.00	0.997	-0.03	-6.75	0.994	-0.05	-27.00	0.905	-0.87	-50.50	0.682	-3.33	-74.00	0.367	-8.71
4.75	0.997	-0.03	-7.00	0.993	-0.06	-27.50	0.901	-0.90	-51.00	0.676	-3.40	-74.50	0.360	-8.88
4.50	0.997	-0.02	-7.25	0.993	-0.06	-28.00	0.898	-0.94	-51.50	0.670	-3.48	-75.00	0.352	-9.06
4.25	0.998	-0.02	-7.50	0.993	-0.07	-28.50	0.894	-0.97	-52.00	0.664	-3.56	-75.50	0.345	-9.25
4.00	0.998	-0.02	-7.75	0.992	-0.07	-29.00	0.890	-1.01	-52.50	0.658	-3.63	-76.00	0.337	-9.44
3.75	0.998	-0.02	-8.00	0.991	-0.07	-29.50	0.887	-1.04	-53.00	0.652	-3.72	-76.50	0.330	-9.63
3.50	0.998	-0.01	-8.25	0.991	-0.08	-30.00	0.883	-1.08	-53.50	0.646	-3.80	-77.00	0.323	-9.83
3.25	0.999	-0.01	-8.50	0.990	-0.08	-30.50	0.879	-1.12	-54.00	0.640	-3.88	-77.50	0.315	-10.03
3.00	0.999	-0.01	-8.75	0.990	-0.09	-31.00	0.875	-1.16	-54.50	0.634	-3.96	-78.00	0.308	-10.24
2.75	0.999	-0.01	-9.00	0.989	-0.09	-31.50	0.871	-1.20	-55.00	0.627	-4.05	-78.50	0.300	-10.45
2.50	0.999	-0.01	-9.25	0.989	-0.10	-32.00	0.867	-1.24	-55.50	0.621	-4.14	-79.00	0.293	-10.67
2.25	0.999	-0.01	-9.50	0.988	-0.10	-32.50	0.863	-1.28	-56.00	0.615	-4.23	-79.50	0.285	-10.89
2.00	0.999	0.00	-9.75	0.987	-0.11	-33.00	0.859	-1.32	-56.50	0.608	-4.32	-80.00	0.278	-11.13
1.75	1.000	0.00	-10.00	0.987	-0.12	-33.50	0.855	-1.36	-57.00	0.602	-4.41	-80.50	0.270	-11.36
1.50	1.000	0.00	-10.50	0.985	-0.13	-34.00	0.851	-1.41	-57.50	0.596	-4.50	-81.00	0.263	-11.61
1.25	1.000	0.00	-11.00	0.984	-0.14	-34.50	0.846	-1.45	-58.00	0.589	-4.60	-81.50	0.255	-11.86
1.00	1.000	0.00	-11.50	0.982	-0.15	-35.00	0.842	-1.49	-58.50	0.583	-4.69	-82.00	0.248	-12.12
0.75	1.000	0.00	-12.00	0.981	-0.17	-35.50	0.838	-1.54	-59.00	0.576	-4.79	-82.50	0.240	-12.39
0.50	1.000	0.00	-12.50	0.979	-0.18	-36.00	0.833	-1.59	-59.50	0.570	-4.89	-83.00	0.233	-12.67
0.25	1.000	0.00	-13.00	0.978	-0.20	-36.50	0.829	-1.63	-60.00	0.563	-4.99	-83.50	0.225	-12.96
0.00	1.000	0.00	-13.50	0.976	-0.21	-37.00	0.824	-1.68	-60.50	0.556	-5.09	-84.00	0.217	-13.26
-0.25	1.000	0.00	-14.00	0.974	-0.23	-37.50	0.819	-1.73	-61.00	0.550	-5.20	-84.50	0.210	-13.57
-0.50	1.000	0.00	-14.50	0.972	-0.25	-38.00	0.815	-1.78	-61.50	0.543	-5.30	-85.00	0.202	-13.89
-0.75	1.000	0.00	-15.00	0.970	-0.26	-38.50	0.810	-1.83	-62.00	0.536	-5.41	-85.50	0.195	-14.22
-1.00	1.000	0.00	-15.50	0.968	-0.28	-39.00	0.805	-1.88	-62.50	0.530	-5.52	-86.00	0.187	-14.56
-1.25	1.000	0.00	-16.00	0.966	-0.30	-39.50	0.800	-1.93	-63.00	0.523	-5.63	-86.50	0.179	-14.93
-1.50	1.000	0.00	-16.50	0.964	-0.32	-40.00	0.796	-1.99	-63.50	0.516	-5.75	-87.00	0.172	-15.30
-1.75	1.000	0.00	-17.00	0.962	-0.34	-40.50	0.791	-2.04	-64.00	0.509	-5.86	-87.50	0.164	-15.70
-2.00	0.999	0.00	-17.50	0.960	-0.36	-41.00	0.786	-2.10	-64.50	0.502	-5.98	-88.00	0.156	-16.11
-2.25	0.999	-0.01	-18.00	0.957	-0.38	-41.50	0.781	-2.15	-65.00	0.495	-6.10	-88.50	0.149	-16.54
-2.50	0.999	-0.01	-18.50	0.955	-0.40	-42.00	0.776	-2.21	-65.50	0.488	-6.22	-89.00	0.141	-17.00
-2.75	0.999	-0.01	-19.00	0.952	-0.42	-42.50	0.770	-2.27	-66.00	0.481	-6.35	-89.50	0.134	-17.48
-3.00	0.999	-0.01	-19.50	0.950	-0.45	-43.00	0.765	-2.32	-66.50	0.475	-6.48	-90.00	0.126	-17.99
-3.25	0.999	-0.01	-20.00	0.947	-0.47	-43.50	0.760	-2.38	-67.00	0.467	-6.60			
-3.50	0.998	-0.01	-20.50	0.945	-0.49	-44.00	0.755	-2.44	-67.50	0.460	-6.74			
-3.75	0.998	-0.02	-21.00	0.942	-0.52	-44.50	0.749	-2.51	-68.00	0.453	-6.87			
-4.00	0.998	-0.02	-21.50	0.939	-0.54	-45.00	0.744	-2.57	-68.50	0.446	-7.01			
-4.25	0.998	-0.02	-22.00	0.936	-0.57	-45.50	0.739	-2.63	-69.00	0.439	-7.15			
-4.50	0.997	-0.02	-22.50	0.933	-0.60	-46.00	0.733	-2.70	-69.50	0.432	-7.29			
-4.75	0.997	-0.03	-23.00	0.931	-0.63	-46.50	0.728	-2.76	-70.00	0.425	-7.43			
-5.00	0.997	-0.03	-23.50	0.928	-0.65	-47.00	0.722	-2.83	-70.50	0.418	-7.58			
-5.25	0.996	-0.03	-24.00	0.924	-0.68	-47.50	0.716	-2.90	-71.00	0.411	-7.73			
-5.50	0.996	-0.04	-24.50	0.921	-0.71	-48.00	0.711	-2.96	-71.50	0.403	-7.89			
-5.75	0.996	-0.04	-25.00	0.918	-0.74	-48.50	0.705	-3.03	-72.00	0.396	-8.04			
-6.00	0.995	-0.04	-25.50	0.915	-0.77	-49.00	0.699	-3.11	-72.50	0.389	-8.21			
-6.25	0.995	-0.05	-26.00	0.912	-0.80	-49.50	0.694	-3.18	-73.00	0.382	-8.37			
-6.50	0.994	-0.05	-26.50	0.908	-0.84	-50.00	0.688	-3.25	-73.50	0.374	-8.54			

**Adjacent Channel Study**  
**For Station W279AP, Facility\_id: 152369**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1154466	66309	BLED	20061019AAQ	WVGR	REGENTS OF THE UNIVERSITY OF MICHIGAN	B	GRAND RAPIDS	MI	LIC	96	469	281	2	52.5	0.0831
682539	152364	BNPFT	20030827ADS	W279BF	EDGEWATER BROADCASTING, INC.	D	HASTINGS	MI	CP	0.013	357	279	0	41.9	0
629224	138651	BNPFT	20030310BBT	NEW	CALVARY CHAPEL OF TWIN FALLS, INC.	D	GRAND RAPIDS EAST	MI	APP	0.01	355	279	0	48.1	0
645490	152358	BNPFT	20030317DQA	NEW	EDGEWATER BROADCASTING, INC.	D	GRAND RAPIDS	MI	APP	0.01	372	279	0	54.1	0
271662	14658	BLH	19980730KC	WKFR-FM	CUMULUS LICENSING CORP.	B	BATTLE CREEK	MI	LIC	50	418	277	2	71.5	0
164287	9920	BLH	19910828KB	WCZY-FM	CENTRAL MICHIGAN COMMUNICATIONS, INC	A	MOUNT PLEASANT	MI	LIC	3	351	282	3	72.8	0
218323	41681	BLH	19960111KR	WRSR	CONNOISSEUR COMMUNICA. OF FLINT L.P	A	OWOSSO	MI	LIC	2.85	378	280	1	84.9	0



Facility id: 152369;  
Area of Interference;