

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317IOB

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 75 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	Sep	Clr	Facility_id
NEW	KS	IOLA	252	250	RADIO ASSIST MINISTRY, INC.	BNPFT20030317IOQ	D	APP	82	0	8.97 dB	152887
KRBB	KS	WICHITA	250	100000	CAPSTAR TX LIMITED PARTNERSHIP	BLH19890823KB	C	LIC	104.32	0	12.39 dB	39902
NEW	KS	CHANUTE	253	250	COMMUNITY BROADCASTING, INC.	BNPFT20030312AEM	D	APP	67.93	0	18.37 dB	142048
KUSN	KS	DEARING	251	9700	KGGF-KUSN, INC.	BLH19990928AAW	C3	LIC	95.22	0	18.23 dB	83208
KSNP	KS	BURLINGTON	249	6000	SOUTHEAST KANSAS BROADCASTING COMPANY, INC.	BMLH20020821AAL	A	LIC	70.95	0	20.16 dB	12206
KSAJ-FM	KS	ABILENE	253	100000	EBC, INC.	BLH19850401LA	C1	LIC	133.71	0	23.42 dB	18055
NEW	KS	GIRARD	252	140	RADIO ASSIST MINISTRY, INC.	BNPFT20030317IOC	D	APP	136.23	0	23.35 dB	152858
NEW	KS	IOLA	253	115	EDGEWATER BROADCASTING INC.	BNPFT20030317FBN	D	APP	85.49	0	24.71 dB	148861
NEW	KS	MANHATTAN	252	250	UNIVERSITY OF KANSAS	BNPFT20030317KVQ	D	APP	159.17	0	26.34 dB	142515
KFH-FM	KS	CLEARWATER	254	50000	ENTERCOM WICHITA LICENSE, LLC	BLH19950627KB	C2	LIC	120.6	0	26.41 dB	23292
KVOO-FM	OK	TULSA	253	99000	JOURNAL BROADCAST CORPORATION	BLH19880420KC	C	LIC	181.74	0	27.79 dB	68330
KSMK-LP	KS	ST. MARYS	252	100	ST. MARYS ACADEMY HOME STUDY SCHOOL ASSOC.	BLL20020619ACF	LP100	LIC	154.31	24	30.24 dB	126876
KKRK	KS	COFFEYVILLE	255	3200	KGGF-KUSN, INC.	BLH19990826AAA	A	LIC	95.22	0	31.87 dB	34460
960826MP	KS	DEARING	251	0	WILLIAM BRUCE WACHTER		C3	USE	97.53	0	32.86 dB	83202
KUDL	KS	KANSAS CITY	251	100000	ENTERCOM KANSAS CITY LICENSE, LLC	BPH20030310BEB	C0	CP	207.25	0	33.04 dB	2449
KUDL	KS	KANSAS CITY	251	100000	ENTERCOM KANSAS CITY LICENSE, LLC	BMLH20000524AAY	C	LIC	212.79	0	34.74 dB	2449
K252DA	OK	ENID	252	250	PAUL W. & PATSY REGIER	BLFT19950328TA	D	LIC	209.48	0	35.65 dB	51936
NEW	MO	STOCKTON	252	250	COMMUNITY BROADCASTING, INC.	BNPFT20030312BAI	D	APP	221.38	0	36.93 dB	140396
NEW	KS	OTTAWA	253	115	EDGEWATER BROADCASTING INC.	BNPFT20030317FDP	D	APP	122.3	0	36.34 dB	148868
KQRC-FM	KS	LEAVENWORTH	255	100000	ENTERCOM KANSAS CITY LICENSE, LLC	BPH20020626AAN	C0	CP	207.25	0	36.03 dB	74101
KQRC-FM	KS	LEAVENWORTH	255	100000	ENTERCOM KANSAS CITY LICENSE, LLC	BLH19871006KF	C	LIC	206.2	0	36.63 dB	74101
NEW	KS	GIRARD	253	140	RADIO ASSIST MINISTRY, INC.	BNPFT20030317IOE	D	APP	136.23	0	37.35 dB	152862
NEW	KS	GIRARD	253	140	EDGEWATER BROADCASTING INC.	BNPFT20030317FAN	D	APP	136.23	0	37.35 dB	148827
KUDL	KS	KANSAS CITY	251	36000	ENTERCOM KANSAS CITY LICENSE, LLC	BXPH20021224ACW	C	CP	207.25	0	38.83 dB	2449
NEW	KS	OSAWATOMIE	253	140	EDGEWATER BROADCASTING INC.	BNPFT20030317FDM	D	APP	141.84	0	39.02 dB	148867
KQRC-FM	KS	LEAVENWORTH	255	65000	ENTERCOM KANSAS CITY LICENSE, LLC	BXPH20030407AAW	C	APP	207.25	0	39.17 dB	74101