

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 150326

Channel 286

### **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 dB $\mu$  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.

Since the proposed translator is within 320 km of the Canadian border, 47 C.F.R. § 74.1235(d) has been taken into account and this applicant certifies that in no direction does the 34 dB $\mu$  F(50,10) extend beyond 60 km, and this application is therefore in full compliance with 47 C.F.R. § 74.1235(d)(3), which states that "the distance to the 34 dB $\mu$  interfering contour may not exceed 60 km in any direction," and hence complies with 47 C.F.R. § 74.1204(h).

## 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.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
1048576	BXLH20050303ADJ	WOOD-FM	77.1	76.8
190630	BMLH19931005KD	WOOD-FM	87.5	87.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			<b>76.8</b>	

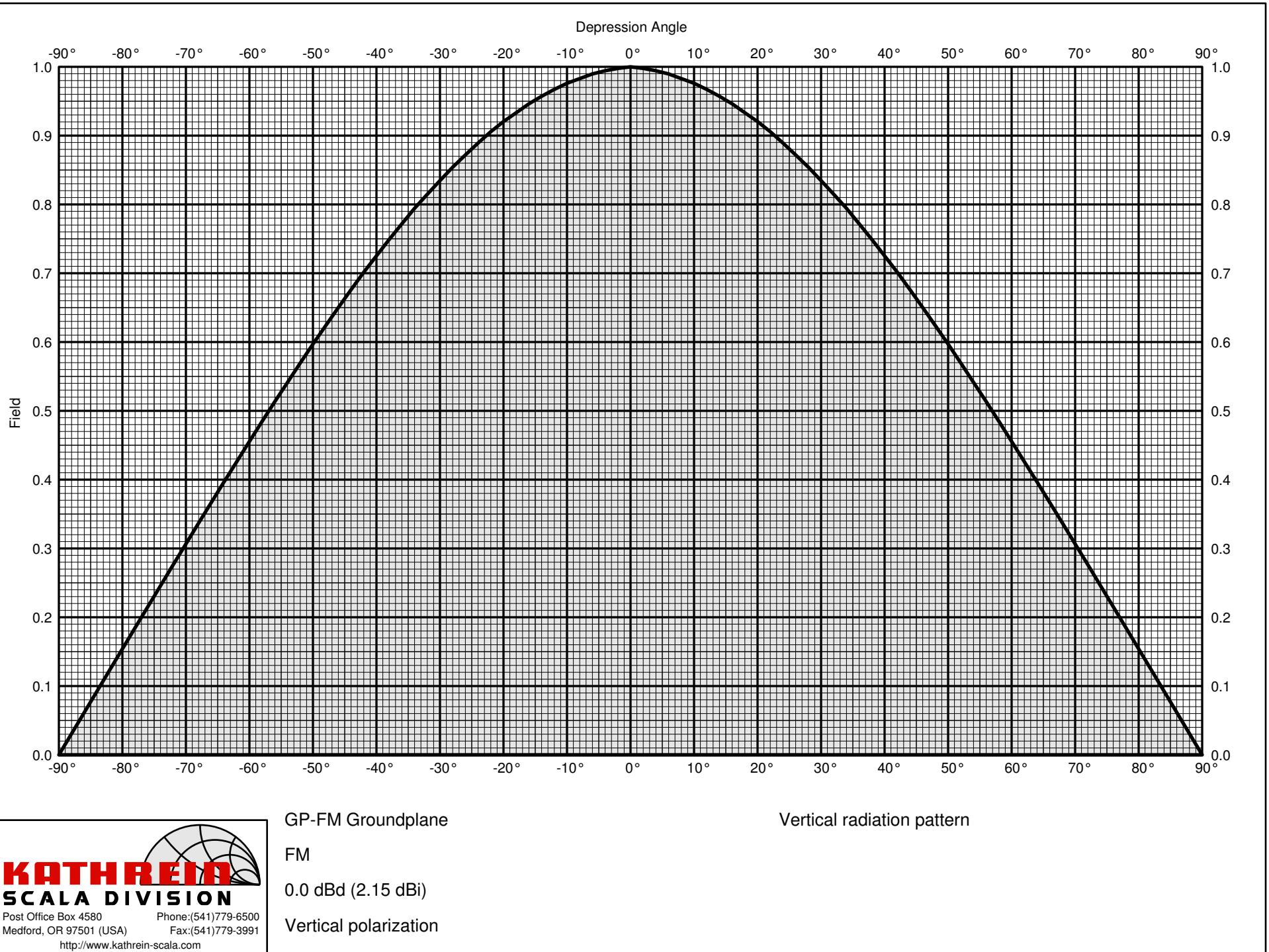
FCC 02-244 at Section II.A.5 states that "when demonstrating that 'no actual interference will occur due to . . . other factors,' pursuant to Section 74.1204(d), an applicant may use the undesired-to-desired signal ratio method." The undesired-to-desired ratio for second and third adjacent stations required by § 74.1204(a) is 40 dB. Since the minimum protected contour strength within the proposed translator's standard interference contour is **76.8 dB $\mu$** , this makes the proposed translator's worst-case interfering contour **116.8 dB $\mu$** . By the free-space equation, this contour is calculated to extend a maximum of **62.5 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 **25.7 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.

<b>Antenna Manufacturer:</b>	<b>SCA</b>
<b>Antenna Model:</b>	<b>GP-FM</b>
<b>CORAGL:</b>	<b>55 m</b>
<b>Maximum ERP:</b>	<b>0.038 kW</b>
<b>Interfering Contour:</b>	<b>116.8 dB<math>\mu</math></b>
<b>Max Int. Contour Distance:</b>	<b>62.5 m</b>
<b>Min Ground Clearance:</b>	<b>25.7 m</b>

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	.992	37.4	62.0	61.8	49.6
10	.976	36.2	61.0	60.1	44.4
15	.952	34.4	59.5	57.5	39.6
20	.920	32.2	57.5	54.0	35.3
25	.881	29.5	55.1	49.9	31.7
30	.835	26.5	52.2	45.2	28.9
35	.783	23.3	48.9	40.1	26.9
40	.725	20.0	45.3	34.7	25.9
45	.663	16.7	41.4	29.3	25.7
50	.597	13.5	37.3	24.0	26.4
55	.527	10.6	32.9	18.9	28.0
60	.456	7.9	28.5	14.3	30.3
65	.382	5.5	23.9	10.1	33.4
70	.307	3.6	19.2	6.6	37.0
75	.231	2.0	14.4	3.7	41.1
80	.154	0.9	9.6	1.7	45.5
85	.077	0.2	4.8	0.4	50.2
90	.010	0.0	0.6	0.0	54.4

Minimum Clearance above TGL: **25.7 m**





GP-FM Groundplane

FM

0.0 dBd (2.15 dBi )

Vertical polarization

Vertical radiation pattern

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
-90	0.010	-40.00	-40.00	0.00	-45	0.663	-3.57	-3.57	0.44
-89	0.015	-36.24	-36.24	0.00	-44	0.676	-3.40	-3.40	0.46
-88	0.031	-30.22	-30.22	0.00	-43	0.689	-3.24	-3.24	0.47
-87	0.046	-26.70	-26.70	0.00	-42	0.701	-3.08	-3.08	0.49
-86	0.062	-24.20	-24.20	0.00	-41	0.713	-2.93	-2.93	0.51
-85	0.077	-22.26	-22.26	0.01	-40	0.725	-2.79	-2.79	0.53
-84	0.092	-20.68	-20.68	0.01	-39	0.737	-2.65	-2.65	0.54
-83	0.108	-19.34	-19.34	0.01	-38	0.749	-2.51	-2.51	0.56
-82	0.123	-18.18	-18.18	0.02	-37	0.760	-2.38	-2.38	0.58
-81	0.139	-17.16	-17.16	0.02	-36	0.772	-2.25	-2.25	0.60
-80	0.154	-16.25	-16.25	0.02	-35	0.783	-2.12	-2.12	0.61
-79	0.169	-15.42	-15.42	0.03	-34	0.794	-2.00	-2.00	0.63
-78	0.185	-14.67	-14.67	0.03	-33	0.805	-1.89	-1.89	0.65
-77	0.200	-13.98	-13.98	0.04	-32	0.815	-1.78	-1.78	0.66
-76	0.215	-13.34	-13.34	0.05	-31	0.825	-1.67	-1.67	0.68
-75	0.231	-12.75	-12.75	0.05	-30	0.835	-1.57	-1.57	0.70
-74	0.246	-12.19	-12.19	0.06	-29	0.844	-1.47	-1.47	0.71
-73	0.261	-11.67	-11.67	0.07	-28	0.854	-1.37	-1.37	0.73
-72	0.276	-11.17	-11.17	0.08	-27	0.863	-1.28	-1.28	0.74
-71	0.291	-10.71	-10.71	0.08	-26	0.872	-1.19	-1.19	0.76
-70	0.307	-10.27	-10.27	0.09	-25	0.881	-1.10	-1.10	0.78
-69	0.322	-9.85	-9.85	0.10	-24	0.889	-1.02	-1.02	0.79
-68	0.337	-9.45	-9.45	0.11	-23	0.897	-0.94	-0.94	0.81
-67	0.352	-9.07	-9.07	0.12	-22	0.906	-0.86	-0.86	0.82
-66	0.367	-8.71	-8.71	0.13	-21	0.913	-0.79	-0.79	0.83
-65	0.382	-8.36	-8.36	0.15	-20	0.920	-0.72	-0.72	0.85
-64	0.397	-8.03	-8.03	0.16	-19	0.927	-0.66	-0.66	0.86
-63	0.411	-7.71	-7.71	0.17	-18	0.933	-0.60	-0.60	0.87
-62	0.426	-7.41	-7.41	0.18	-17	0.940	-0.54	-0.54	0.88
-61	0.441	-7.12	-7.12	0.19	-16	0.946	-0.48	-0.48	0.90
-60	0.456	-6.83	-6.83	0.21	-15	0.952	-0.43	-0.43	0.91
-59	0.470	-6.56	-6.56	0.22	-14	0.957	-0.38	-0.38	0.92
-58	0.485	-6.29	-6.29	0.23	-13	0.962	-0.33	-0.33	0.93
-57	0.499	-6.04	-6.04	0.25	-12	0.967	-0.29	-0.29	0.94
-56	0.513	-5.79	-5.79	0.26	-11	0.972	-0.25	-0.25	0.94
-55	0.527	-5.56	-5.56	0.28	-10	0.976	-0.21	-0.21	0.95
-54	0.541	-5.33	-5.33	0.29	-9	0.979	-0.18	-0.18	0.96
-53	0.555	-5.11	-5.11	0.31	-8	0.983	-0.15	-0.15	0.97
-52	0.570	-4.89	-4.89	0.32	-7	0.986	-0.12	-0.12	0.97
-51	0.583	-4.68	-4.68	0.34	-6	0.990	-0.09	-0.09	0.98
-50	0.597	-4.48	-4.48	0.36	-5	0.992	-0.07	-0.07	0.98
-49	0.610	-4.29	-4.29	0.37	-4	0.994	-0.05	-0.05	0.99
-48	0.624	-4.10	-4.10	0.39	-3	0.996	-0.03	-0.03	0.99
-47	0.637	-3.92	-3.92	0.41	-2	0.998	-0.02	-0.02	1.00
-46	0.650	-3.74	-3.74	0.42	-1	0.999	-0.01	-0.01	1.00
					0	1.000	0.00	0.00	1.00



GP-FM Groundplane

FM

0.0 dBd (2.15 dBi )

Vertical polarization

Vertical radiation pattern

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
0	1.000	0.00	0.00	1.00	45	0.663	-3.57	-3.57	0.44
1	0.999	-0.01	-0.01	1.00	46	0.650	-3.74	-3.74	0.42
2	0.998	-0.02	-0.02	1.00	47	0.637	-3.92	-3.92	0.41
3	0.996	-0.03	-0.03	0.99	48	0.624	-4.10	-4.10	0.39
4	0.994	-0.05	-0.05	0.99	49	0.610	-4.29	-4.29	0.37
5	0.992	-0.07	-0.07	0.98	50	0.597	-4.48	-4.48	0.36
6	0.990	-0.09	-0.09	0.98	51	0.583	-4.68	-4.68	0.34
7	0.986	-0.12	-0.12	0.97	52	0.570	-4.89	-4.89	0.32
8	0.983	-0.15	-0.15	0.97	53	0.555	-5.11	-5.11	0.31
9	0.979	-0.18	-0.18	0.96	54	0.541	-5.33	-5.33	0.29
10	0.976	-0.21	-0.21	0.95	55	0.527	-5.56	-5.56	0.28
11	0.972	-0.25	-0.25	0.94	56	0.513	-5.79	-5.79	0.26
12	0.967	-0.29	-0.29	0.94	57	0.499	-6.04	-6.04	0.25
13	0.962	-0.33	-0.33	0.93	58	0.485	-6.29	-6.29	0.23
14	0.957	-0.38	-0.38	0.92	59	0.470	-6.56	-6.56	0.22
15	0.952	-0.43	-0.43	0.91	60	0.456	-6.83	-6.83	0.21
16	0.946	-0.48	-0.48	0.90	61	0.441	-7.12	-7.12	0.19
17	0.940	-0.54	-0.54	0.88	62	0.426	-7.41	-7.41	0.18
18	0.933	-0.60	-0.60	0.87	63	0.411	-7.71	-7.71	0.17
19	0.927	-0.66	-0.66	0.86	64	0.397	-8.03	-8.03	0.16
20	0.920	-0.72	-0.72	0.85	65	0.382	-8.36	-8.36	0.15
21	0.913	-0.79	-0.79	0.83	66	0.367	-8.71	-8.71	0.13
22	0.906	-0.86	-0.86	0.82	67	0.352	-9.07	-9.07	0.12
23	0.897	-0.94	-0.94	0.81	68	0.337	-9.45	-9.45	0.11
24	0.889	-1.02	-1.02	0.79	69	0.322	-9.85	-9.85	0.10
25	0.881	-1.10	-1.10	0.78	70	0.307	-10.27	-10.27	0.09
26	0.872	-1.19	-1.19	0.76	71	0.291	-10.71	-10.71	0.08
27	0.863	-1.28	-1.28	0.74	72	0.276	-11.17	-11.17	0.08
28	0.854	-1.37	-1.37	0.73	73	0.261	-11.67	-11.67	0.07
29	0.844	-1.47	-1.47	0.71	74	0.246	-12.19	-12.19	0.06
30	0.835	-1.57	-1.57	0.70	75	0.231	-12.75	-12.75	0.05
31	0.825	-1.67	-1.67	0.68	76	0.215	-13.34	-13.34	0.05
32	0.815	-1.78	-1.78	0.66	77	0.200	-13.98	-13.98	0.04
33	0.805	-1.89	-1.89	0.65	78	0.185	-14.67	-14.67	0.03
34	0.794	-2.00	-2.00	0.63	79	0.169	-15.42	-15.42	0.03
35	0.783	-2.12	-2.12	0.61	80	0.154	-16.25	-16.25	0.02
36	0.772	-2.25	-2.25	0.60	81	0.139	-17.16	-17.16	0.02
37	0.760	-2.38	-2.38	0.58	82	0.123	-18.18	-18.18	0.02
38	0.749	-2.51	-2.51	0.56	83	0.108	-19.34	-19.34	0.01
39	0.737	-2.65	-2.65	0.54	84	0.092	-20.68	-20.68	0.01
40	0.725	-2.79	-2.79	0.53	85	0.077	-22.26	-22.26	0.01
41	0.713	-2.93	-2.93	0.51	86	0.062	-24.20	-24.20	0.00
42	0.701	-3.08	-3.08	0.49	87	0.046	-26.70	-26.70	0.00
43	0.689	-3.24	-3.24	0.47	88	0.031	-30.22	-30.22	0.00
44	0.676	-3.40	-3.40	0.46	89	0.015	-36.24	-36.24	0.00
					90	0.010	-40.00	-40.00	0.00

**Adjacent Channel Study**  
**For Station W286AU, Facility\_id: 150326**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
190630	73605	BMLH	19931005KD	WOOD-FM	CLEAR CHANNEL RADIO LICENSES, INC.	B	GRAND RAPIDS	MI	LIC	265	492	289	3	24.4	0.9027
1048576	73605	BXLH	20050303ADJ	WOOD-FM	CLEAR CHANNEL BROADCASTING LICENSES, INC.	B	GRAND RAPIDS	MI	LIC	99	411	289	3	27.2	0.9027
629162	138605	BNPFT	20030310ATM	NEW	CALVARY CHAPEL OF TWIN FALLS, INC.	D	KENTWOOD	MI	APP	0.01	382	285	1	34	0
682911	150333	BNPFT	20030828AAP	W286BA	EDGEWATER BROADCASTING, INC.	D	SOUTH HAVEN	MI	CP	0.027	272	286	0	48.8	0
643695	150639	BNPFT	20030317JEV	NEW	RADIO ASSIST MINISTRY, INC.	D	GRAND RAPIDS	MI	APP	0.01	372	285	1	51.3	0
913193	150335	BNPFT	20030826AHG	W286AR	EDGEWATER BROADCASTING, INC.	D	THREE RIVERS	MI	CP	0.005	361	286	0	61.5	0
148537	37463	BMLH	19900518KC	WRCC	CASPTAR TX LIMITED PARTNERSHIP	A	MARSHALL	MI	LIC	6	374	285	1	62.6	0
682530	150329	BNPFT	20030827ACR	W286AW	EDGEWATER BROADCASTING, INC.	D	DOWAGIAC	MI	CP	0.013	354	286	0	65	0
648940	155701	BNPFT	20030317CZZ	NEW	CALVARY CHAPEL OF TWIN FALLS, INC.	D	NUNICA	MI	APP	0.013	315	285	1	70.9	0
1108963	126875	BLL	20060118ADK	WVBH-LP	THE FLATS ECONOMIC DEVELOPMENT CORP.	L1	BENTON HARBOR	MI	LIC	0	209	287	1	77.9	0
1069283	24644	BXLH	20050622ACD	WSNX-FM	CLEAR CHANNEL BROADCASTING LICENSES, INC.	B	MUSKEGON	MI	LIC	22	334	283	3	84.8	0
118821	24644	BLH	19880930KC	WSNX-FM	GOODRICH RADIO, LLC	B	MUSKEGON	MI	LIC	32	392	283	3	84.8	0
1128711	71090	BLH	20060516ACU	WHTS	CITADEL BROADCASTING COMPANY	B	COOPERSVILLE	MI	LIC	20	469	287	1	93.2	0
711203	36274	BLH	20031222AAB	WTHD	LAKE CITIES BROADCASTING CORPORATION	A	LAGRANGE	IN	LIC	2.4	445	288	2	100	0
1037418	53639	BMLH	20041230ACW	WFRN-FM	PROGRESSIVE BROADCASTING SYSTEM, INC.	B	ELKHART	IN	LIC	50	384	284	2	100.3	0

