

# Exhibit 12

## Interference Analysis Overlap Requirements

According to CFR 47 §74.1204(a), translators are required to protect all existing FM stations from interference due to overlap of the protected contours of the existing stations with the interfering contours of the new translators.

### US Stations

In the attached tabular printout, Only AP242 has outgoing contour overlap from the proposed translator, so no interference to other stations is anticipated. Incoming overlap is not prohibited.

AP242 is the current application, and need not be protected.

No other entries are sufficiently close to the proposed translator to require analysis.

### IF Separation

No stations separated by 53 or 54 channels were found by the search.

### Mexican Consideration

The "Agreement Between The Government of the United States of America and the Government of the United Mexican States" of 1992, Annex 1, Section 2, defines the current regulation concerning translators located within 320 km of the Mexican border.

This section reads as follows:

#### 2.1 Low Power FM Stations (LPFM)

2.1.1 LPFM stations may operate on any channel from 201 to 300 and they must protect the allotments and assignments of the other Administration based on their maximum permitted parameters in accordance with the Table of Allotment's and Assignments.

2.1.2 An LPFM station is permitted to operate with ERP that shall not exceed 50 watts in the direction of the other country and to produce an interfering contour not to exceed 32 km in the direction of the other country.

2.1.3 The maximum distance to the protected contour (60 dBu) all of an LPFM station shall be 8.7 km in the direction of the other country.

2.1.4 LPFM stations located within 125 km of the common border must be notified in accordance with the notification procedures in Article 8.

2.1.5 An LPFM station located in excess of 125 km from the common border may operate with an ERP in excess of 50 watts in the direction of the other country, provided the protected contour produced is not greater than, starting from 125 km from the common border, 8.7 km in the direction of the other country. Before the station can commence operation it must comply with a notification procedures contained in Article 8 and the provisions of 2.1.1, 2.1.6, and 2.1.7 of this section.

2.1.6 Should any interference be caused by an LPFM station, the offending station must immediately correct the interference or cease operation.

2.1.7 The use of a channel by an LPFM station shall not prejudice in any manner the future allotment of such channel by the other Administration.

The proposed translator is 76 km from the Mexican border, so it falls under the provisions of the Agreement, Sections 2.1.1, 2.1.2, 2.1.3 and 2.1.4 (LPFM stations less than 125 km from the common border). These are reflected in CFR 47 §74.1235(d).

The direction to Mexico is 265 degrees true.

All LPFM stations within 125 km from the border must certify that their interfering contour [34 dBu F(50,10)] in the direction of the other country should not exceed 32 km. The accompanying chart shows that the interfering contour reaches only 31.8 km in the direction of Mexico, less than the 32 km requirement. All LPFM stations must also show that their 60 dBu F(50,50) contour shall not exceed 8.7 km in the direction of the other country. The chart also shows that the contour only proceeds 6.7 km in the direction of Mexico. The ERP in the direction of Mexico is 32 Watts, less than the limit of 50 Watts.

Therefore this proposal completely satisfies the requirements of the Agreement.



Exhibit 12

Mexico Terrain and Contour Data  
 AP239 Hebronville, TX

ERP 0.032 kW  
 N. Lat. 27 19 0  
 W. Lon. 98 40 7  
 Center of Radiation 281.00 m AMSL

Az. Deg T.	Avg Elev 3-16 km Meters AMSL	Effective Antenna Ht Meters AAT	ERP Kilowatts	Distance to Contour (km)	
				60.0 dBu F(50,50)	34.0 dBu F(50,10)
0	177.0	104.0	0.0320	7.9	38.0
30	155.7	125.3	0.0320	8.7	41.3
60	146.1	134.9	0.0320	9.0	42.6
90	143.2	137.8	0.0320	9.1	42.9
120	136.6	144.4	0.0320	9.3	43.7
150	144.8	136.2	0.0320	9.0	42.7
180	159.5	121.5	0.0320	8.5	40.8
210	182.8	98.2	0.0320	7.7	36.9
240	194.4	86.6	0.0320	7.2	34.4
270	205.0	76.0	0.0320	6.7	31.9
300	201.8	79.2	0.0320	6.9	32.7
330	189.1	91.9	0.0320	7.4	35.6
	Average	169.667	111.333	<--HAAT m	
265	205.2	75.8	0.0320	6.7	31.8