

[Exhibit 12]

## **Non-Interference Compliance**

For an Open Site

Regarding FCC File Number: BNPFT-20030317HOL

### **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:

- 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.

Frequency Finder

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
NEW	IA	MOUNT VERNON	238	140	RADIO ASSIST MINISTRY INC.	BNPFT20030317EJV	D	APP	0	0	152260
KCQQ	IA	DAVENPORT	293	100000	CITICASTERS LICENSES, L.P.	BLH19980413KD	C1	LIC	77.41	3.74 dB	32987
KOKZ	IA	WATERLOO	289	100000	KXEL BROADCASTING COMPANY, INC.	BLH19850613KC	C	LIC	88	3.23 dB	35949
KCII-FM	IA	WASHINGTON	291	3000	HOME BROADCASTING, INC.	BMLH19990525KH	A	LIC	75.73	4.04 dB	71015
NEW	IA	DAVENPORT	291	15	RADIO ASSIST MINISTRY INC.	BNPFT20030317HMW	D	APP	76.86	8.62 dB	153553
KIYX	IA	SAGEVILLE	291	4200	QUEENB RADIO WISCONSIN, INC	BMLH20020426AAX	A	LIC	102.59	10.35 dB	77326
KCII-FM	IA	WASHINGTON	291	0	HOME BROADCASTING, INC.		A	USE	75.73	12.19 dB	71015
KCQQ	IA	DAVENPORT	293	60000	CITICASTERS LICENSES, L.P.	BMLH19980826KA	C1	LIC	70.54	15.78 dB	32987
KIYX	IA	SAGEVILLE	291	0	QUEENB RADIO WISCONSIN, INC		A	USE	89.33	16.47 dB	77326
KOKZ	IA	WATERLOO	289	100000	KXEL BROADCASTING COMPANY, INC.	BMLH19860602KA	C	LIC	105.61	17.98 dB	35949
NEW	MN	PORT CARGAILL	292	250	AMFM RADIO LICENSES, LLC	BNPFT20030314BWW	D	APP	57.92	18.17 dB	138367
NEW	IA	WILTON	288	100	IOWA DEPARTMENT OF TRANSPORTA	BNPL20010615AHQ	LP100	APP	34.87	22.14 dB	133746
NEW	IL	GALESBURG	291	250	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030314BDX	D	APP	134.74	22.54 dB	143574
KRTI	IA	GRINNELL	294	50000	CENTRAL IOWA BROADCASTING, INC.	BLH19930601KB	C2	LIC	116.73	24.62 dB	35564
NEW	IL	GALVA	291	13	RADIO ASSIST MINISTRY INC.	BNPFT20030317HYC	D	APP	133.85	24.68 dB	153733
NEW	IL	GALESBURG	291	10	RADIO ASSIST MINISTRY INC.	BNPFT20030317HYJ	D	APP	131.61	24.23 dB	153743
NEW	IA	FORT MADISON	291	92	RADIO ASSIST MINISTRY INC.	BNPFT20030317HNX	D	APP	141.65	24.69 dB	153582
NEW	IL	STERLING	291	10	RADIO ASSIST MINISTRY INC.	BNPFT20030317HZQ	D	APP	134.18	25.07 dB	153903
NEW	IA	OTTUMWA	291	34	RADIO ASSIST MINISTRY INC.	BNPFT20030317HOV	D	APP	139.68	25.16 dB	153611
	IL	KNOXVILLE	291	0		RM10670	A	APP	137.77	26.74 dB	0
KLSS-FM	IA	MASON CITY	291	100000	THREE EAGLES OF MASON CITY, INC.	BLH19860527KA	C1	LIC	204.67	29.40 dB	47094