

[Exhibit 12]

Non-Interference Compliance

For an Open Site

Regarding FCC File Number: BNPFT-20030317GAP

Channel: 273

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.

Frequency Finder Results

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
NEW	MO	CAMERON	273	140	EDGEWATER BROADCASTING INC.	BNPFT20030317FWW	D	APP	57.27	1.53 dB	149106
NEW	MO	MARYVILLE	273	75	EDGEWATER BROADCASTING INC.	BNPFT20030317FYV	D	APP	55.96	1.06 dB	149124
KSRC	MO	KANSAS CITY	271	100000	INFINITY RADIO OPERATIONS INC.	BPH20010103AAH	C	CP	90.28	5.84 dB	11279
KSRC	MO	KANSAS CITY	271	100000	INFINITY RADIO OPERATIONS INC.	BLH19850712KQ	C	LIC	89.35	6.01 dB	11279
NEW	MO	KANSAS CITY	273	75	EDGEWATER BROADCASTING INC.	BNPFT20030317FXX	D	APP	79.79	10.54 dB	149119
K220FX	MO	ST. JOSEPH	220	13	CALVARY CHAPEL OF TWIN FALLS, INC.	BLFT19970417TA	D	LIC	13.93	13.9	78965
KSRC	MO	KANSAS CITY	271	52000	INFINITY RADIO OPERATIONS INC.	BMXPH20010802AAS	C	CP	90.28	13.06 dB	11279
KSRD	MO	ST. JOSEPH	220	10000	CALVARY CHAPEL OF ST. JOSEPH, INC.	BPED19970313MM	C3	CP	25.48	13.5	85873
NEW	KS	DE SOTO	273	205	EDGEWATER BROADCASTING INC.	BNPFT20030317EZX	D	APP	103.56	15.99 dB	148824
NEW	MO	CHILLICOTHE	273	75	EDGEWATER BROADCASTING INC.	BNPFT20030317FXD	D	APP	101.09	16.76 dB	149111
NEW	MO	RICHMOND	273	75	EDGEWATER BROADCASTING INC.	BNPFT20030317GAD	D	APP	112.64	19.72 dB	149132
NEW	MO	BELTON	273	34	EDGEWATER BROADCASTING INC.	BNPFT20030317FWI	D	APP	126.65	23.27 dB	149100
KBLS	KS	NORTH FORT RILEY	273	100000	EBC, INC.	BLH19921230KB	C1	LIC	198.04	27.84 dB	65598
NEW	MO	BROOKFIELD	273	115	EDGEWATER BROADCASTING INC.	BNPFT20030317FWM	D	APP	160	28.43 dB	149101
KNCY-FM	NE	AUBURN	276	14000	RADIO 2000 NE, INC.	BMLH20020926ACX	C3	LIC	104.97	28.17 dB	63953
KMMO-FM	MO	MARSHALL	275	76000	MISSOURI VALLEY BROADCASTING, INC.	BMPH20020925ABQ	C1	CP MOD	153.89	28.02 dB	43226
KSTZ	IA	DES MOINES	273	100000	SAGA COMMUNICATIONS OF IOWA, LLC	BPH20011101AAW	C0	CP	229.94	30.90 dB	58541
KLTQ	NE	LINCOLN	270	96400	WAITT RADIO, INC.	BLH20020214AAE	C0	LIC	176.46	30.18 dB	35067
KMMO-FM	MO	MARSHALL	275	100000	MISSOURI VALLEY BROADCASTING, INC.	BLH19931213KB	C1	LIC	158.99	31.90 dB	43226
KQTP	KS	ST. MARYS	275	30000	CUMULUS LICENSING CORP.	BLH20030326AHX	C2	LIC	120.14	31.21 dB	60034
KSTZ	IA	DES MOINES	273	92000	SAGA COMMUNICATIONS OF IOWA, LLC	BLHRB1104ZZ	C	LIC	238.51	32.01 dB	58541
NEW	MO	RAYTOWN	274	100	COMMUNITY FOURSQUARE CHURCH	BNPL20010116AEZ	LP100	APP	103.47	33.42 dB	131697
KFRX	NE	LINCOLN	274	100000	THREE EAGLES OF LINCOLN, INC.	BLH6363	C1	LIC	189.44	34.23 dB	34435
NEW	MO	KIRKSVILLE	273	250	EDGEWATER BROADCASTING INC.	BNPFT20030317FYL	D	APP	199.86	34.55 dB	149123
NEW	KS	OLATHE	274	100	MIDAMERICA NAZARENE UNIVERSITY	BNPL20000831ABE	LP100	APP	109.34	35.22 dB	126064
KLLE-LP	IA	NEOLA	273	100	IOWA DEPARTMENT OF TRANSPORTATION	BMPL20030326ACF	LP100	CP MOD	193.18	37.84 dB	133654
870710ME	KS	NORTH FORT RILEY	273	0	KAW VALLEY BROADCASTING CO.		C1	USE	198.04	38.37 dB	33566