

[Exhibit 12]

Non-Interference Compliance

Regarding Facility id 152298

Channel 275

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 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 μ 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 4 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.

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 μ 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
107797	BLH19871216KF	KMGI	132.7	125.2
198481	BLH19940420KB	KFTZ	62.5	62.1
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				62.1

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 **62.1 dB μ** , this makes the proposed translator's worst-case interfering contour **102.1 dB μ** . By the free-space equation, this contour is calculated to extend a maximum of **548 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population"). 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.

Antenna Manufacturer: JAM
Antenna Model: JSCP-1
CORAGL: 64 m
Maximum ERP: 0.099 kW
Interfering Contour: 102.1 dB μ
Max Int. Contour Distance: 548 m

Adjacent Channel Study
For Station K280FI, Facility_id: 152298

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
107797	51215	BLH	19871216KF	KMGI	PACIFIC EMPIRE COMMUNICATIONS CORP.	C	POCATELLO	ID	LIC	100	1840	273	2	0.5	0.5908
198481	18116	BLH	19940420KB	KFTZ	MARATHON MEDIA OF IDAHO, L.P.	C1	IDAHO FALLS	ID	LIC	100	1801	277	2	68.4	0.5908
984582	18118	BLFTB	20040428AAC	KFTZ-FM1	BONNEVILLE HOLDING COMPANY	D	POCATELLO	ID	LIC	2	1438	277	2	6	0
299732	8810	BLFT	143	K272AG		D	SODA SPRINGS, ETC.	ID	LIC	0.055	2148	272	3	72.9	0
299731	22345	BLFT	16	K272AB		D	PRESTON, ETC.	ID	LIC	0.008	1878	272	3	102.2	0
200967	4405	BLFT	19940714TF	K276DR	BEAR LAKE COUNTY T.V. DISTRICT	D	MONTPELIER	ID	LIC	0.01	2178	276	1	106.6	0
215625	38925	BLFT	19951023TJ	K275AB	LOWER STAR VALLEY TV ASSOCIATION	D	FREEDOM	WY	LIC	0.01	2720	275	0	116.7	0
1251187	157704	BLFT	20080619AKN	K277BD	FRANDSEN MEDIA COMPANY, LLC	D	WESTON	ID	LIC	0.25	1725	277	2	124.6	0
1007859	33446	BMLH	20040817AAL	KMVX	KART BROADCASTING CO, INC.	C1	JEROME	ID	LIC	100	1413	275	0	155.7	0
276238	83882	BLH	19981029KA	KWYS-FM	ALPINE BROADCASTING LIMITED PARTNERSHIP	C	ISLAND PARK	ID	LIC	46	3004	275	0	207.7	0

MICHAUD CREEK QUADRANGLE
IDAHO
7.5 MINUTE SERIES (TOPOGRAPHIC)

3589 IV NW
(POCATELLO NORTH)

4,748,000 32'30" R. 33 E. R. 34 E. 375 376 410 000 FEET 112° 30' 42° 52' 30"

