

[Exhibit 12]

## **Non-Interference Compliance**

Regarding Facility id 91707

Channel 213

### **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.

Page 4 includes a tabulation of the vertical radiation pattern for the proposed antenna provided by the antenna manufacturer.

Page 5 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 dBμ 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 6 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.

Page 7 of this exhibit is a high resolution aerial photo of the vicinity surrounding the proposed translator's tower site provided by the U.S. Geological Survey's National Aerial Photography Program. It has been included to provide clarification of the nature of the buildings in the vicinity.

**Note: The highest building within the zone of interference is no higher than 25ft (7.6m). As shown on the following pages, the area of interference clears the tower ground level (TGL) by 10.7 m at the lowest point. 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.**

## 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 dBμ 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.

<b>Application_id</b>	<b>File Number</b>	<b>Callsign</b>	<b>Contour at Tower</b>	<b>Min. Contour</b>
1236578	BMPED20080228AC H	KLTP	80.5	79.2
1249459	BPED20080205AGG	KUTX	82.8	81.8
143411	BLFT19900102TB	K215BH	67.6	67.6
223897	BLED19960424KA	KUTX	83.5	82.5
Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour				<b>67.6</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 **67.6 dBμ**, this makes the proposed translator's worst-case interfering contour **107.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **216.9 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 6 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. 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.

**Note: The highest building within the zone of interference is no higher than 25ft (7.6m). As shown on the following page, the area of interference clears the tower ground level (TGL) by 10.7 m at the lowest point. 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:** NIC  
**Antenna Model:** BKG77  
**CORAGL:** 107 m  
**Maximum ERP:** 0.055 kW  
**Interfering Contour:** 107.6 dBμ  
**Max Int. Contour Distance:** 216.9 m  
**Min Ground Clearance:** 10.7 m

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	.999	54.9	216.6	215.8	88.1
10	.982	53.0	213.0	209.7	70.0
15	.954	50.1	206.9	199.8	53.5
20	.918	46.3	199.1	187.1	38.9
25	.871	41.7	188.9	171.2	27.2
30	.818	36.8	177.4	153.6	18.3
35	.758	31.6	164.4	134.7	12.7
40	.691	26.3	149.9	114.8	10.7
45	.616	20.9	133.6	94.5	12.5
50	.538	15.9	116.7	75.0	17.6
55	.465	11.9	100.8	57.8	24.4
60	.391	8.4	84.8	42.4	33.6
65	.313	5.4	67.9	28.7	45.5
70	.239	3.1	51.8	17.7	58.3
75	.176	1.7	38.2	9.9	70.1
80	.128	0.9	27.8	4.8	79.7
85	.103	0.6	22.3	1.9	84.7
90	.105	0.6	22.8	0.0	84.2
Minimum Clearance above TGL:					<b>10.7 m</b>



BKO77

<b>Vertical</b>	-66	0.297	54	0.479	174	0.468
<b>Values</b>	-63	0.345	57	0.436	177	0.479
-180	0.487	-60	0.391	60	0.391	
-177	0.478	-57	0.436	63	0.345	
-174	0.467	-54	0.479	66	0.297	
-171	0.460	-51	0.523	69	0.253	
-168	0.454	-48	0.568	72	0.211	
-165	0.447	-45	0.616	75	0.176	
-162	0.439	-42	0.661	78	0.145	
-159	0.429	-39	0.706	81	0.120	
-156	0.419	-36	0.745	84	0.105	
-153	0.402	-33	0.783	87	0.100	
-150	0.385	-30	0.818	90	0.105	
-147	0.369	-27	0.852	93	0.118	
-144	0.359	-24	0.881	96	0.134	
-141	0.350	-21	0.910	99	0.151	
-138	0.338	-18	0.934	102	0.168	
-135	0.326	-15	0.954	105	0.185	
-132	0.314	-12	0.972	108	0.202	
-129	0.303	-9	0.987	111	0.219	
-126	0.290	-6	0.999	114	0.236	
-123	0.278	-3	0.999	117	0.252	
-120	0.265	0	1.000	120	0.265	
-117	0.251	3	0.999	123	0.278	
-114	0.236	6	0.999	126	0.290	
-111	0.218	9	0.987	129	0.304	
-108	0.202	12	0.972	132	0.314	
-105	0.185	15	0.954	135	0.327	
-102	0.168	18	0.934	138	0.338	
-99	0.151	21	0.910	141	0.350	
-96	0.134	24	0.881	144	0.360	
-93	0.118	27	0.852	147	0.370	
-90	0.105	30	0.818	150	0.386	
-87	0.100	33	0.783	153	0.403	
-84	0.105	36	0.745	156	0.420	
-81	0.120	39	0.706	159	0.430	
-78	0.145	42	0.661	162	0.440	
-75	0.176	45	0.616	165	0.448	
-72	0.211	48	0.568	168	0.455	
-69	0.253	51	0.523	171	0.461	

Better than SWR

**Adjacent Channel Study  
For Station K213EW, Facility\_id: 91707**

**Co-channel through third adjacent:**

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
1286337	120615	BLEP	20080324AJA	KLTP	EDUCATIONAL MEDIA FOUNDATION	C3	SAN ANGELO	TX	LIC	2.915	790	215	2	10.8	0.3282
143411	10952	BLFT	19900102TB	K215BH	CHRISTIAN BROADCASTING COMPANY, INC.	D	SAN ANGELO	TX	LIC	0.316	759	215	2	11.8	0.3282
1249459	9776	BPED	20080205AGG	KUTX	THE UNIVERSITY OF TEXAS AT AUSTIN	C2	SAN ANGELO	TX	CP	6	857	211	2	12.9	0.3282
223897	9776	BLEP	19960424KA	KUTX	THE UNIVERSITY OF TEXAS AT AUSTIN	C2	SAN ANGELO	TX	LIC	5	907	211	2	12.9	0.3282
1213816	175960	BNPED	20071017AHM	NEW	TX SOUTH COMMUNITY BROADCAST CORPOR	A	MENARD	TX	APP	6	655	212	1	80.8	0
1237763	174985	BNPED	20071017AKM	NEW	TEXAS COMMUNITY BROADCAST ASSOCIATIO	A	BRADY	TX	APP	4	619	216	3	111.7	0
1087469	87588	BLEP	20050927AHV	KAGT	GOSPEL RADIO NETWORK	C1	ABILENE	TX	LIC	100	616	213	0	132.5	0

OR  
3,486,000

959

3,485,000

3,484,000

3,483,000

3,482,000

3,481,000

3,480,000

360,000

361,000

362,000

363,000

364,000



