

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317JDZ

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 4 of this exhibit.

Page 3 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference protection provisions based on 47 CFR 74.1204(d), which states:

"an 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."

In addition, page 3 includes a tabulation of the second and third adjacent stations which this application is required to protect and the field strengths of those stations in the vicinity of the proposed translator. The field strengths given were based on contours predicted using FCC contour algorithms and 3 arc second terrain data.

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.

Page 4 of this exhibit is the tabulated data from the interference analysis, which shows all stations that this application had to consider for contour protection. These tabulated values were generated using high resolution 3 arc second terrain data for the best possible accuracy.

Page 5 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 min quadrangle at full scale with the calculated area of interference overlayed. 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 a free-space calculation (see FCC 98-117, Appendix A, pg. 41 for reference to the equation used).

Since the proposed translator is 185.1 km from the Canadian border, 47 CFR 74.1235(d) has been taken into account and this applicant certifies that in no direction does the 34 dBu F(50,10) extend beyond 60 km, and this application is therefore in full compliance with 47 CFR 74.1235(d)(3), which states that "the distance to the 34 dBu interfering contour may not exceed 60 km in any direction," and hence in compliance with 47 CFR 74.1204(h).

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 10 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.

- Entries highlighted in red are those stations where there is overlap of predicted contours and lack of population has been demonstrated within the area of interference.

Compliance with 47 CFR 74.1204(d)

The proposed translator's Maximum Effective Radiated Power (ERP) is 0.01kW at 123 meters above ground level. According to 47 CFR, 74.1204(a), the desired to undesired ratio between 2nd/3rd adjacent stations is 40dB, making the proposed translator's interfering contour 113.6dBu F(50,10).

Using a free-space calculation (equation referenced in FCC 98-117, Appendix A, pg. 41), this proposed translator's F(50,10) interference contour was calculated and plotted on the pertinent portion of a USGS quadrangle (page 5 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the calculated area of interference (Note: FCC 02-244, II, A, 6 states that USGS quadrangles are sufficient for demonstrating lack of population). Hence, in accordance with 47 CFR 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 therefore this application is in full compliance with 47 CFR 74.1204.

CORAGL: 123m

Antenna Manufacturer: SWR

Maximum ERP: 0.01kW

Antenna Model: FM1

F(50,10) Interfering Contour: 113.6dBu

F(50,10) Max Distance: 46.3m

The F(50,50) signal strength of all relevant second and third adjacent stations have been examined, and are tabulated below. Column three shows the station's signal level at the proposed translator's tower site, and column four gives the minimum value within the entire proposed translator's standard F(50,10) contour (100 dBu for most classes, 94 dBu for class B's, 97 dBu for class B1's). For signal levels too great to determine, 999 was entered. The minimum F(50,50) contour within the proposed translator's standard F(50,10) contour was used to calculate the proposed translator's interference contour, thereby assuring a minimum undesired-to-desired ratio of 40dB for all relevant adjacent stations, as required in 47 CFR, 74.1204(a).

FCC File Number	Call Sign	F(50,50) Contour at Tower	Min. F(50,50) Contour
BLH20030224ABB	WBLM	76dBu	76.3dBu
BLH19981125KC	WBLM	73.9dBu	73.6dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Application's 100dBu F(50,10) Contour:			73.6dBu

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Cir	Facility_id
WBLM	ME	PORTLAND	275	100000	CITADEL BROADCASTING COMPANY	BLH20030224ABB	C	LIC	46.19	-16.53 dB	22878
WBLM	ME	PORTLAND	275	100000	CITADEL BROADCASTING COMPANY	BLH19981125KC	C	LIC	31.55	-14.23 dB	22878
WPKQ	NH	NORTH CONWAY	279	21500	CITADEL BROADCASTING COMPANY	BPH19991109ABV	C	CP	106.17	4.21 dB	48401
WPKQ	NH	BERLIN	279	21500	CITADEL BROADCASTING COMPANY	BLH19881228KA	C	LIC	106.17	4.21 dB	48401
WPKQ	NH	BERLIN	279	4800	CITADEL BROADCASTING COMPANY	BLH19970717KD	C	LIC	106.17	10.84 dB	48401
WMCM	ME	ROCKLAND	277	16000	CLEAR CHANNEL BROADCASTING LICENSES, INC.	BLH20011121AAR	B	LIC	129.66	13.28 dB	57301
WODS	MA	BOSTON	277	16000	INFINITY BROADCASTING OPERATIONS, INC.	BMLH19990126KA	B	LIC	145.8	17.81 dB	9639
NEW	NH	BARNSTEAD	277	50	NEW HAMPSHIRE GOSPEL RADIO, INC.	BNPFT20030314AHT	D	APP	66.39	20.81 dB	145612
WODS	MA	BOSTON	277	7800	INFINITY BROADCASTING OPERATIONS, INC.	BLH19900202KB	B	LIC	145.8	20.18 dB	9639
NEW	NH	DOVER	278	100	DOVER COMMUNITY RADIO SERVICE	BNPL20000901AEJ	LP100	APP	45.96	24.03 dB	126860
NEW	ME	PORTLAND	223	250	LIGHT OF LIFE MINISTRIES, INC.	BNPFT20030314CKP	D	APP	26	26	145407
WPKQ*	NH	NORTH CONWAY	279	0		FM ALLOTMENT	C	RSV	106.17	29.06 dB	0
WMCM	ME	ROCKLAND	277	0	CLEAR CHANNEL BROADCASTING LICENSES, INC.		B	USE	129.63	29.41 dB	57301
WPKQ*	NH	NORTH CONWAY	279	0		FM ALLOTMENT	C	RSV	106.17	29.06 dB	122066
WKNE	NH	KEENE	279	12000	SAGA COMMUNICATIONS OF NEW ENGLAND, LLC	BLH19921231KD	B	LIC	160.12	32.75 dB	36834
WODS	MA	BOSTON	277	0	INFINITY BROADCASTING OPERATIONS, INC.		B	USE	145.8	32.91 dB	9639
WKNE	NH	KEENE	279	18000	SAGA COMMUNICATIONS OF NEW ENGLAND, LLC	BLH19950420KE	B	LIC	159.99	33.98 dB	36834
WBLM	ME	PORTLAND	275	0	CITADEL BROADCASTING COMPANY		C	USE	46.16	36.10 dB	22878
NEW	NH	PORTSMOUTH	280	170	NEW HAMPSHIRE PUBLIC RADIO	BNPFT20030317JVI	D	APP	52.56	37.46 dB	140553
CITE-1	QU	SHERBROOKE	274	92000			C1		243.43	38.34 dB	96287



ARN: BNPFT-20030317JDZ F(50,10)

1, VIRGINIA—1984



ROAD LEGEND

Improved Road
Unimproved Road
Trail

○ Interstate Route ◻ U. S. Route ○ State Route

BAR MILLS, MAINE

PROVISIONAL EDITION 1983

43070-E5-TF-024

1	2	3	1 Limington
4		5	2 Standish
			3 Gorham
6	7	8	4 Waterboro
			5 Old Orchard Beach
			6 Alfred
			7 Kennebunk
			8 Biddeford

ADJOINING 7.5' QUADRANGLE NAMES