

[Exhibit 12]

Non-Interference Compliance

Regarding FCC File Number: BNPFT-20030317JEN

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).

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 62 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 0.062kW at 147 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 171.5dBu 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: 147m

Antenna Manufacturer: SWR

Maximum ERP: 0.062kW

Antenna Model: FM1

F(50,10) Interfering Contour: 171.5dBu

F(50,10) Max Distance: 0.1m

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
BLH6136	KFIN	999dBu	131.5dBu
Minimum F(50,50) Protected Contour of Adjacent Station Within Proposed Application's Standard F(50,10) Contour:			131.5dBu

Frequency Finder Results

Callsign	State	City	Channel	ERP_w	Licensee	ARN	Class	Status	Distance_km	Clr	Facility_id
KFIN	AR	JONESBORO	300	98000	CAPSTAR TX LIMITED PARTNERSHIP	BLH6136	C1	LIC	0.01	-86.83 dB	17690
KFIN	AR	JONESBORO	300	0	CAPSTAR TX LIMITED PARTNERSHIP		C1	USE	0.01	-56.92 dB	17690
KDRS-FM	AR	PARAGOULD	296	3000	MOR MEDIA, INC.	BLH20000128AAK	A	LIC	28.73	2.66 dB	59150
NEW	AR	FORREST CITY	298	115	EDGEWATER BROADCASTING INC.	BNPFT20030317JEE	D	APP	74.78	7.90 dB	149858
KFEB	MO	CAMPBELL	298	17500	EAGLE BLUFF ENTERPRISES	BLH19981113KA	C3	LIC	111.39	10.79 dB	76532
WMPS	TN	GERMANTOWN	298	3900	FLINN BROADCASTING CORPORATION	BPH20010625AAA	A	CP	114.22	15.65 dB	50330
WMPS	TN	GERMANTOWN	298	3900	FLINN BROADCASTING CORPORATION	BLH20020529AAU	A	LIC	114.22	15.65 dB	50330
KQDD	AR	OSCEOLA	297	1600	PHOENIX BROADCASTING GROUP, INC.	BLH19980714KD	A	LIC	73.61	17.85 dB	52904
WMPS	TN	GERMANTOWN	298	3000	FLINN BROADCASTING CORPORATION	BPH19870908MV	A	CP	116.12	17.35 dB	50330
KOMT	AR	MOUNTAIN HOME	298	90000	MAC PARTNERS	BLH20000316ABZ	C1	LIC	175.23	20.50 dB	39532
KOMT	AR	MOUNTAIN HOME	298	100000	MAC PARTNERS	BPH20030423ABF	C0	APP	175.23	20.23 dB	39532
DKKJJ	MO	CAMPBELL	298	0	JACK G. HUNT		C3	USE	111.09	22.98 dB	29619
NEW	MS	FORREST CITY	297	115	EDUCATIONAL MEDIA FOUNDATION	BNPFT20030314BEJ	D	APP	79.2	23.49 dB	139994
KQDD	AR	OSCEOLA	297	0	PHOENIX BROADCASTING GROUP, INC.		A	USE	73.73	25.43 dB	52904
NEW	MS	COLDWATER	299	3055	AMERICAN FAMILY ASSOCIATION	BNPFT20030310ATX	D	APP	143.53	27.31 dB	141723
870908MQ	TN	GERMANTOWN	298	0	AMERICAN INDIAN BROADCAST GROUP		C3	USE	134.5	27.45 dB	1743
KOMT	AR	MOUNTAIN HOME	298	0	MAC PARTNERS		C1	USE	138.51	28.06 dB	39532
KDRS-FM	AR	PARAGOULD	296	0	MOR MEDIA, INC.		A	USE	28.79	28.06 dB	59150
KKSY	AR	BALD KNOB	296	19000	CALDWELL BROADCASTING, LLC	BLH19960826KD	C3	LIC	101.51	29.60 dB	31452
KLAL	AR	WRIGHTSVILLE	299	100000	CITADEL BROADCASTING COMPANY	BPH20020723AAD	C1	CP	189.62	31.70 dB	47880
WWYN	TN	MCKENZIE	295	100000	RAINBOW MEDIA, INC.	BPH20020328AAD	C1	CP	177.51	31.91 dB	54947
WWYN	TN	MCKENZIE	295	100000	RAINBOW MEDIA, INC.	BLH19880519KC	C1	LIC	177.42	31.89 dB	54947
WMJW	MS	ROSEDALE	298	25000	RADIO CLEVELAND, INC.	BLH19930803KC	C3	LIC	205.7	32.87 dB	9024
KXHT	AR	MARION	296	2750	FLINN BROADCASTING CORPORATION	BLH19980413KB	A	LIC	92.27	33.20 dB	5213
NEW	KY	CLINTON	298	50	HEARTLAND MINISTRIES, INC.	BNPFT20030317LGD	D	APP	185.05	33.80 dB	145288
KOMT	AR	MOUNTAIN HOME	298	0	MAC PARTNERS		C0	RSV	175.23	34.57 dB	39532
KBMV-FM	MO	BIRCH TREE	296	25000	EAGLE BLUFF ENTERPRISES	BPH20030331ADL	C3	APP	153.48	36.65 dB	29623
KLAL	AR	WRIGHTSVILLE	299	50000	CITADEL BROADCASTING COMPANY	BLH19941021KA	C2	LIC	189.89	37.52 dB	47880
WHHM-FM	TN	HENDERSON	299	50000	THOMAS RADIO, LLC	BPH20030312AUR	C2	APP	195.34	37.18 dB	10766
WHHM-FM	TN	HENDERSON	299	50000	THOMAS RADIO, LLC	BPH20030312AUR	C2	APP	195.34	37.18 dB	10766
WHHM-FM	TN	HENDERSON	299	50000	THOMAS RADIO, LLC	BLH20021211AAD	C2	LIC	195.34	38.23 dB	10766
KBMV-FM	MO	BIRCH TREE	296	15000	EAGLE BLUFF ENTERPRISES	BLH19950915KA	C3	LIC	150.23	38.56 dB	29623



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