

EXHIBIT 12

**Modify K285CN FM Translator Station
104.9 MHz – 0.028 kW ERP Fort Smith, AR
to
Proposed CH 288D – 105.5 MHz – 0.243 KW @ Fort Smith, AR**

September 14, 2012

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Fred H. Baker, Jr. ("Baker"), licensee of FM translator station K285CN, Channel 285D, Fort Smith, Arkansas. On July 12, 2011 the FCC released FCC 11-105, THIRD FURTHER NOTICE OF PROPOSED RULE MAKING, which includes a freeze on any move-in involving an FM translator authorized from Auction 83. K285CN was granted its original construction permit BLFT-19870804TG on April 4, 1985 and was not part of FCC Auction 83 which occurred in March, 2003. The current licensed site of K285CN is located in Sebastian County, Arkansas, which is part of the Fort Smith, AR Arbitron Metro. Fort Smith is Arbitron metro rank #158 and was not included in Appendix A, the list of 156 Arbitron metros subject to revised processing rules for FM translators as part of the Local Community Radio Act of 2010. It is believed that this Form 349 application is not affected by those revised processing guidelines.

Baker herein proposes to modify the existing license of K285CN by changing the frequency to third adjacent channel 288D (105.5 MHz) and relocating to an existing tower associated with ASR #1040841, which is located in Fort Smith, AR. The proposed K285CN will operate with 243 watts ERP at 165 meters height above average terrain. The modified K285CN will be used as a fill-in translator for KHGG(AM) 1580

KHz, Facility ID # 52427, licensed to Fort Smith, AR. Baker has obtained permission to retransmit KHGG(AM) from Pharis Broadcasting, Inc., the licensee of KHGG(AM). Exhibit 10 is a map depicting that the proposed K285CN 60 dBu contour is contained inside the licensed KHGG(AM) 2.0 mV/M daytime contour.

Exhibits 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. The channel study indicates a total of four short spacings. This application is short spaced to KMCK-FM Channel 289C1, Prairie Grove, AR, KXXM Channel 286A, Muldrow, AR, KYEL(FM) Channel 288A, Danville, AR and co-owned FM translator K288CH, Booneville, AR. The short spacing to K288CH is being resolved as Baker is filing a Form 349 to change K288CH to Channel 290D. The proposed facility for K288CH is shown in blue as being fully spaced on the channel study.

Exhibit 13-B shows that the proposed K285CN facility will not interfere with KMCK-FM Channel 289C1, licensed to Prairie Grove, AR. The proposed K285CN FCC F(50,10) 54 dBu interfering contour does not overlap with the FCC F(50,50) 60 dBu contour of KMCK-FM.

Exhibit 13-D shows that the proposed K285CN facility FCC interfering contour with respect to KXXM(FM) Channel 286A, construction permit at Muldrow, OK using the 40 dBu D/U ratio was calculated to be 105.9 dBu. The exhibit includes an elevation pattern study of the Shively 6832 6 bay half wave broadband antenna which shows the 105.9 dBu interfering contour of the proposed K285CN facility will reach to within 3.5 meters

(11.5 ft.) of ground level at its lowest point. The interfering contour reaches closest to ground level in a radius from 112 meters to 135 meters from the base of the tower. The attached photographs and statement from Fred Baker, Jr., licensee of K285CN show that the ground level elevation around the tower is no higher than the tower base and that the tallest structures near the tower are all single story. Therefore the interfering contour will not reach any FM receivers.

Exhibit 13-E shows that the proposed K285CN facility FCC F(50,10) 40 dBu interfering contour does not overlap with the FCC F(50,50) 60 dBu of KYEL(FM) Channel 288A, Danville, AR.

Exhibit 13-F demonstrates compliance with Section 74.1233(a) by showing common overlap the FCC F(50,50) 60 dBu contours of the licensed facility of K285CN at Fort Smith, AR and the proposed facility of K285CN on Channel 288D at Ft. Smith, AR.

No interference will be created with or received from any existing translator station or low power FM (LPFM) facility.

A study has been undertaken to show the proposed K285CN facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A, 17-B and 17-C.