

EXHIBIT 12  
TECHNICAL STATEMENT  
CLEVELAND, OHIO 283D  
KEVIN J. YOUNGERS  
FCC FORM 349  
MARCH 2013

This Technical Statement is in support of a minor change application, FCC form 349, being filed on behalf of Kevin J. Youngers in regards to a new FM translator from the Auction 83 Filing Window, application BNPFT-20030317LOD for Cleveland, Ohio, facility ID 157726.

Kevin J. Youngers is proposing to relocate to an existing tower site, ASR 1219643, at the coordinates N.  $41^{\circ}-29'13''$ , W.  $81^{\circ}-41'02''$ , NAD 27. The proposed operation will use a Nicom single bay nondirectional antenna with an Effective Radiated Power of 1 Watt.

The antenna will be mounted at 80 meters Above Ground Level, with a Center of Radiation at 258 meters Above Mean Sea Level. Figure 1 shows a channel interference study conducted from the proposed site for the new translator. The only pertinent records for further study are:

- 1) WQKT Wooster, Ohio 283B License
- 2) WQAL Cleveland, Ohio 281B License
- 3) WCLV Lorrain, Ohio 285A License

Figure 2 is a predicted coverage maps showing the 34 dB interference contour F(50,10) of the proposed operation and the 54 dB protected contour F(50,50) of WQKT Wooster, Ohio on channel 283B. As can be seen, there is no prohibited overlap between these two contours.

The proposed site is located within the protected contours of 2nd adjacent stations WQAL Cleveland, Ohio on channel 281B and WCLV Lorrain, Ohio on channel 285A. The

predicted F(50-50) field strength of WQAL at the proposed transmitter site is 82.8 dB and the maximum distance to the interfering contour is 5.1 meters. The predicted F(50-50) field strength of WCLV at the proposed transmitter site is 62.1 dB and the maximum distance to the interfering contour is 55.1 meters. Because the transmitter on the tower is 80 meters above ground level, the interference generated by the proposed FM transmitter never reaches within 24 meters of the ground and covers no population. The applicant, Kevin J. Youngers, respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference.

Figure 3 is an aerial view of the site.

Figure 4 shows the overlap between the 60 dB contours of the proposed facility, in red, and the current tech box, in blue, seeking to be modified by this application.

This proposal meets Section 4 of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement between the Government of Canada and the Government of the United States of America relating to the FM Broadcasting Service. The ERP at 1 Watt does not exceed 50 Watts. Figure 5 shows that the proposed 34 dB interference contour F(50,10) does not exceed 32 km (violet circle) in any direction.

It was concluded that the proposed operation of a new translator in Cleveland, Ohio on 283D will not cause any harmful interference to any existing stations and will be in full compliance with the Commission's rules. 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.