

EXHIBIT 12
TECHNICAL STATEMENT AND REQUEST FOR EXPEDITED PROCESSING
W258CI CINCINNATI, OHIO 258D
KEVIN J. YOUNGERS
FCC FORM 349
NOVEMBER 2016

This Technical Statement is in support of a minor change application to a Construction Permit, file no. BMPFT-20150224ABG, FCC form 349, being filed on behalf of Kevin J. Youngers in regards to FM translator W258CI Cincinnati, Ohio, facility ID 157690. The applicant, Kevin J. Youngers respectfully requests expedited processing of this application as the CP for W258CI expires on December 6, 2016.

Kevin J. Youngers is proposing a minor change to a building site at the coordinates N. 39°-06'07", W. 84°-31'32", NAD 27. The proposed operation will use a Nicom dipole horizontally polarized with an Effective Radiated Power of 1 Watt.

The antenna will be mounted at 15 meters Above Ground Level, with a Center of Radiation at 179 meters Above Mean Sea Level. Figure 1 shows a channel interference study conducted from the proposed site. In the first line of the table of Figure 1, there is an apparent short spacing, but this is the same facility as this proposal and will be replaced by this application. The only pertinent records for further study are:

- 1) WAOL Ripley, Ohio 258C3 License
- 2) WHKO Dayton, Ohio 256B License

Figure 2 is a predicted coverage map showing the 40 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of WMMX Dayton, Ohio on channel 299B. As can be seen, there is no prohibited overlap between these two contours.

The proposed site is located within the protected 60 dB contours of 2nd adjacent station WHKO Dayton, Ohio on channel 256B. Figure 3 shows the predicted 100 dBu

interfering signal contour F(50-10) generated by the proposed facility for W258CI. Note that there is no population within the interference zone. 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 4 shows the overlap between the 60 dB contours of the proposed facility, in red, and the current CP, in blue, seeking to be modified by this application.

The proposed operation of W258CI will operate as a fill-in translator for WDJO(AM), 1480 kHz, Cincinnati, Ohio. Figure 5 shows that the 60 dB contour of the proposed operation of W258CI is entirely within the WDJO 2 mV/m contour and within 25 miles of the WDJO transmitter site.

It was concluded that the proposed operation of W258CI Cincinnati, Ohio on 258D 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.