

Exhibit 12

**New FM Translator Station
BNPFT-20180125ABT
Proposed CH 227D – 93.3 MHz – 0.250 KW
Keokuk, IA
April 18, 2018**

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Riverfront Broadcasting of Keokuk, Inc. (“Riverfront”), licensee of Class B AM Station KOKX 1310 kHz, Facility ID No. 58264, Keokuk, IA. Riverfront herein is filing FCC Long Form 349 application BNPFT-20180125ABT for a new FM translator at Keokuk, IA. KOKX did not participate in the 2016 250 mile AM filing window and therefore is eligible for the Auction 100 AM filing window for new FM translators for all AM stations.

The proposed new facility will be used as a fill-in translator for co-owned primary station KOKX(AM), licensed to Keokuk, IA. The proposed new facility would operate on Channel 227D (93.3 MHz) with 250 watts non-directional with the transmit antenna located at 100 meters height above ground level and 105 meters HAAT. Exhibit 10 demonstrates that the proposed FCC F(50,50) 60 dBu contour of the new facility is contained within KOKX 2.0 mV/M daytime contour. Therefore it is believed that this application is in compliance with Section 74.1201(g) of the Commission’s rules.

Exhibit 13-A is a channel study that assumes a Class A 6 kW facility operating on channel 256 and is provided to FCC staff as a convenience to help identify potential contour overlap issues. Exhibit 13-B shows Section 74.1204 contour protection to third adjacent channel full power FM

station WCEZ, Channel 230A, Carthage, IL. Exhibit 13-C shows Section 74.1204 contour protection to co-channel full power FM station WPBG, Channel 227B, Peoria, IL. Exhibit 13-D shows Section 74.1204 contour protection to first adjacent full power FM station KKMI, Channel 228A, Burlington, IA. Exhibit 13-E shows Sections 74.1204 contour protection to co-channel FM translator K227CH, Channel 227D, Hannibal, MO. Exhibit 13-F shows Section 74.1204 contour protection to second adjacent full power FM station KGRC, Channel 225C1, Hannibal, MO. No interference will be delivered to any existing low power FM (LPFM) facility.

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