

EXHIBIT 12
WAY MEDIA, INC.
COMPREHENSIVE TECHNICAL STATEMENT
NEW TRANSLATOR – BETHANY, OR FACID 140432

FCC FORM 349

This Technical Statement is in support of the Long-Form FCC Form 349 to cover the Auction 83 Short Form Application BNPFT-20030310BHI filed by WAY Media, Inc. ("WAY") for a new FM translator station to serve Bethany, OR. This application seeks a new translator station utilizing the Technical parameters stated in the original short-form application with the exception of a slight modification of antenna orientation and a reduction in effective radiated power necessary to demonstrate U/D ratio compliance.

PRIMARY STATION:

The proposed translator facility will rebroadcast station KKCW (FM) Beaverton, OR FACID 68210, owned by Citicasters Licenses, Inc. WAY has received permission from Citicasters Licenses, Inc to rebroadcast KKCW (FM) on the translator facility. The 60dBu (50,50) contour KKCW (FM) fully encompasses the proposed 60dBu (50,50) contour of the translator station as demonstrated in the map shown in Attachment #1.

OVERLAP REQUIREMENTS

The Map of Contours as Attachment #2 and Channel Study as Attachment #3 depict the proposed allocation situation with respect to all pertinent co and adjacent facilities. All facilities have been depicted utilizing either the maximum ERP or directional pattern data as on file with the commission and 1 degree radial intervals on close in contours in the interest of accuracy. AAT data for the proposed facility was derived from the FCC's 30 second database, ComStudy.

As seen on the Map of Contours, Channel 236-D is operable at the proposed location with the following facility notes:

- In compliance with 47 CFR 74.1204(g) the proposed facility operates at an effective radiated power which is not over 100 watts, therefore protection to intermediate frequency facilities has not been calculated.

- The proposed location is within the protected 60dbu (50,50) contour of third-adjacent station KLYK(FM) channel 233-A, Kelso, Washington, located 13.14 km away. Therefore, an interference analysis has been conducted based on the U/D ratio of +40 db at the proposed site. The signal of KLYK(FM) at the proposed location is 73.72 dBu (50,50) making the relevant interfering contour of the proposed facility 113.72 dBu (50,10). The free space distance to this contour in a worse-case scenario utilizing a single dipole antenna is 72.27 meters.

- The proposed location is within the protected 60dbu (50,50) contour of second-adjacent station KBFF(FM) channel 238-C, Portland, Oregon, located 75.95 km away. Therefore, an interference analysis has been conducted based on the u/d ratio of +40 db at the proposed site. The signal of KBFF(FM) at the proposed location is 61.10 dBu (50,50) making the relevant interfering contour of the proposed facility 101.10 dBu (50,10). The free space distance to this contour in a worse-case scenario utilizing a single dipole antenna is 309.0 meters.

- The applicant has proposed the use of a horizontally polarized directional antenna, Scala model CL-FM, which has the vertical radiation characteristics as shown in the manufacturer's data sheet in Attachment #4. That data has been duplicated in the attached spreadsheet which shows the distance to the largest of the specific interfering contours noted above, that being the 101.10 dBu (50,10).

- The aerial photograph in Attachment #5 is an accurate depiction of the tower location and the surrounding area. The photograph demonstrates the locations and azimuths of the closest public access points to the tower structure and the proposed interfering contour. These are annotated as follows:

Azimuth	Access	Distance	ERP	Distance to Contour
100 deg	Barn	40 m	0.0	0 m
170 deg	Driveway	80 m	4.0	91.7 m
265 deg	Driveway	15 m	0.0	0 m
330 deg	Driveway	10 m	0.0	0 m

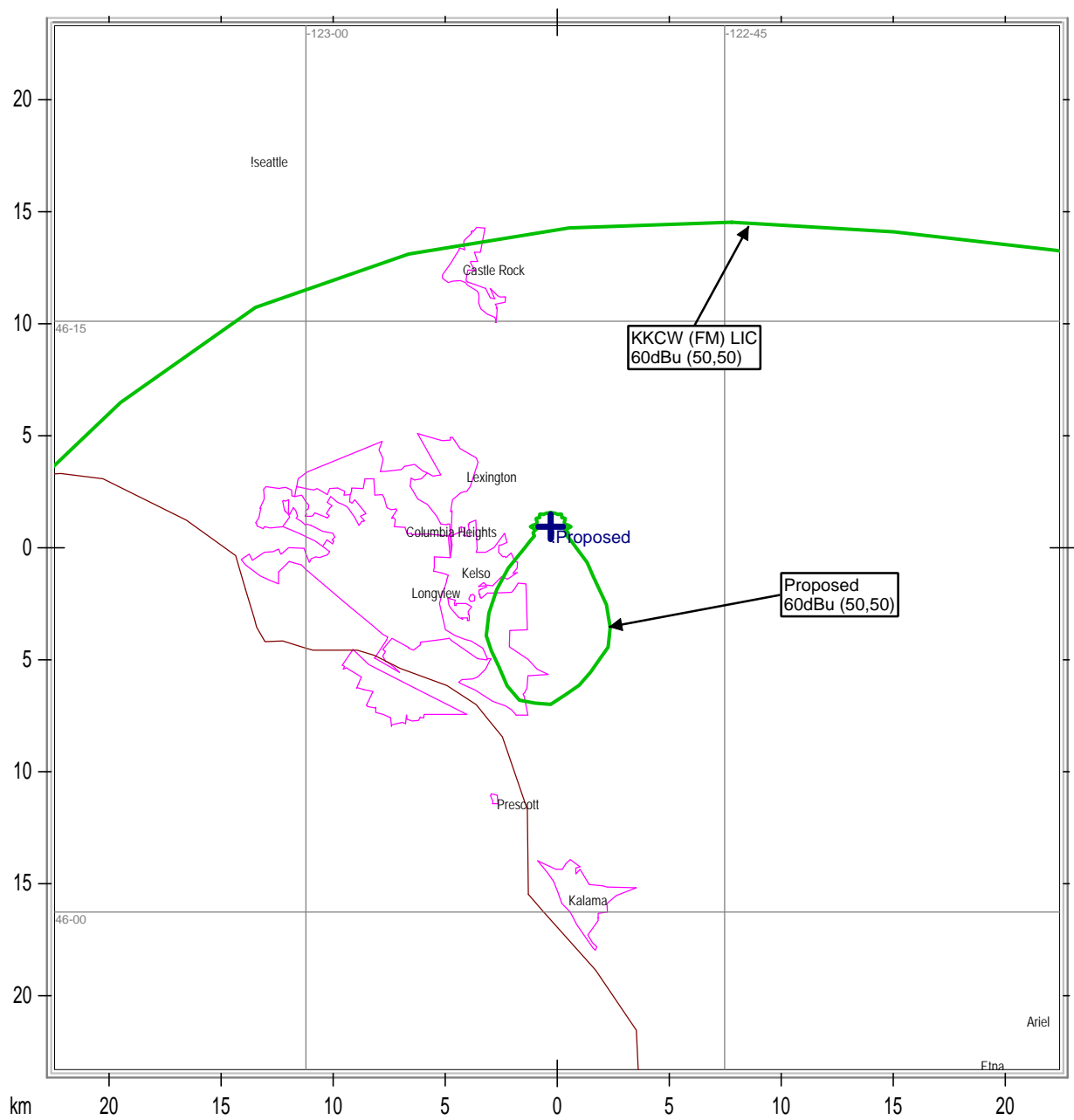
The only azimuth which warrants consideration is the 170 degree which would place the interfering contour 2 meters above ground at a depression angle of 36 degrees, with a reduced field of 0.742 for an interfering contour of 91.7 meters, versus the actual distance from the aperture of the antenna of 98.8 meters. This demonstrates that at none of the public access points in the area of the tower would the actual interfering contour come in contact with the public.

Based on this showing, a waiver of section 74.1204 is requested in accordance with *Living Way Ministries, Inc.* (FCC 08-242) on the basis of zero population in the area of interference.

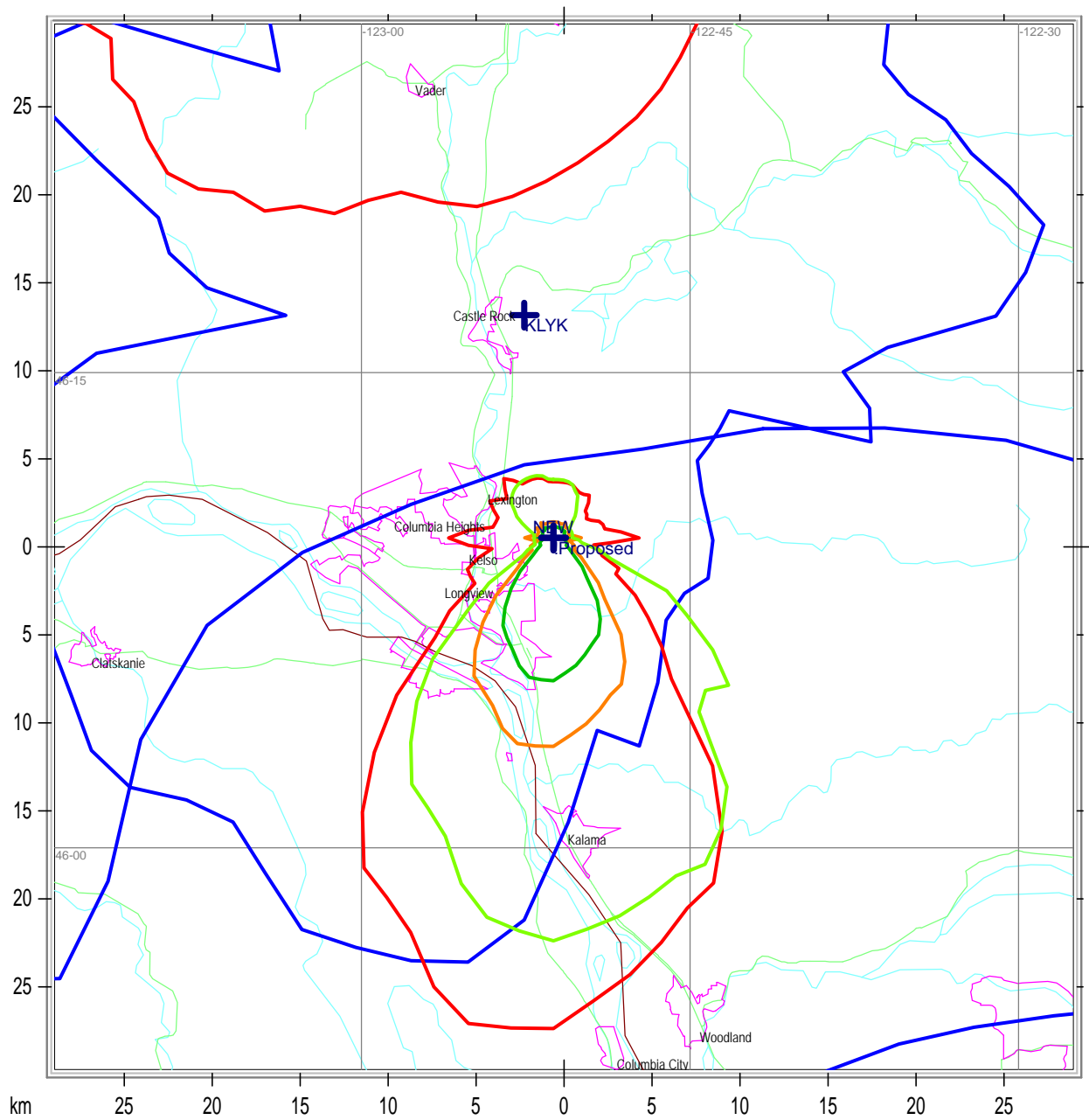
It should be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 CFR 74.1203.

LPFM CONSIDERATION

As the location and operating frequency are the same as the short-form request, there is no change in LPFM preclusion from that already demonstrated. That previous demonstration showed that the proposed application site is located in rural Cowlitz County, WA, a part no Arbitron Market, and is not within 39 km. of the Grid of any Spectrum Available or Spectrum Limited Market Grid. The map in Attachment #6 demonstrates that this facility is not in, nor within 39km of any Market Grid.



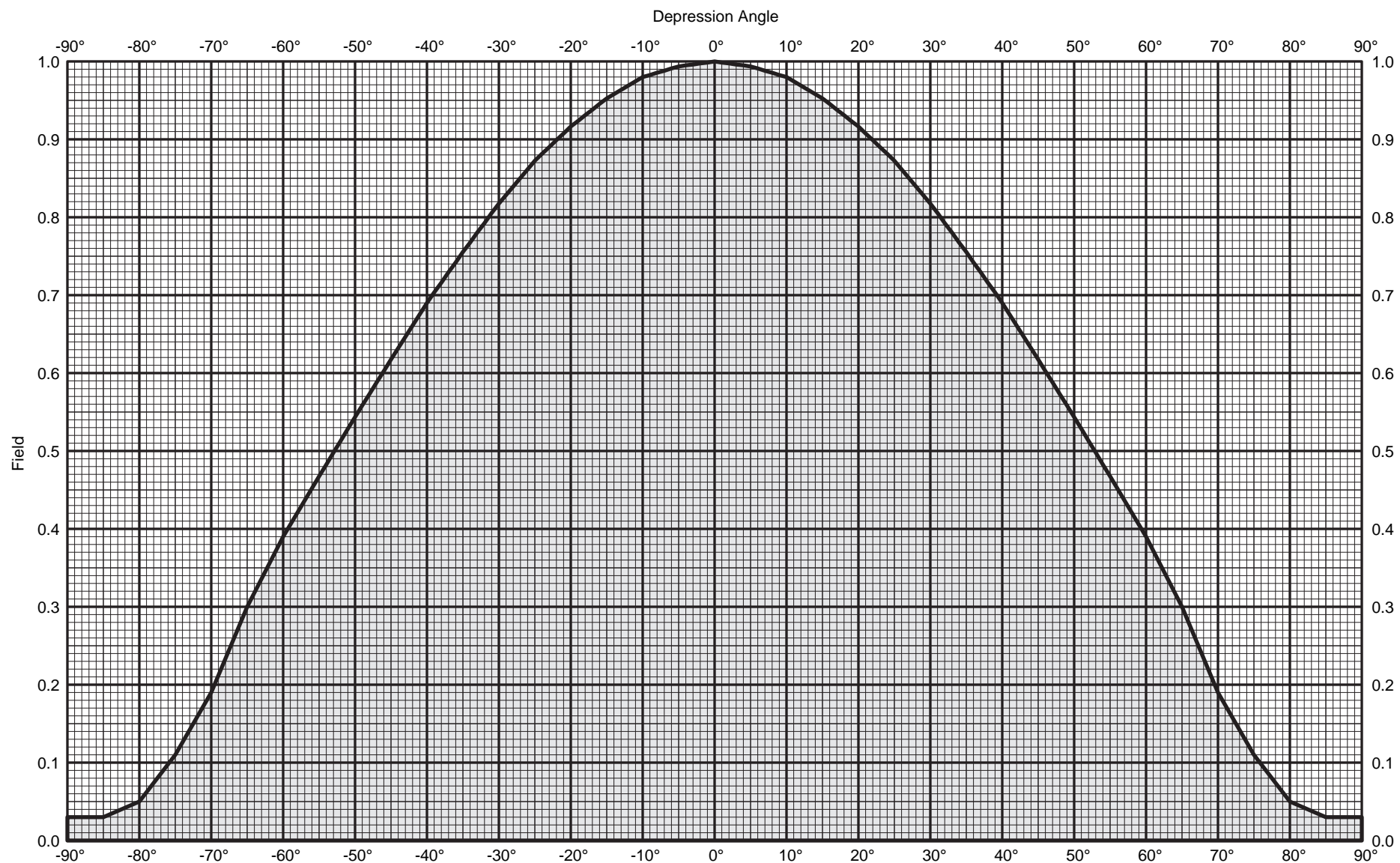
State Borders City Borders Lat/Lon Grid



State Borders City Borders Highways Water Features Lat/Lon Grid

ComStudy 2.2
Search of channel 236
(95.1 MHz Class D)
at
46-09-47.0 N, 122-51-13.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
NEW	BETHANY	OR 236 D	0.00	0.00	90.0	-52.94 dB
(This Short Form Request - Mutually Exclusive)						
KLYK	KELSO	WA 233 A	13.14	0.00	352.5	-14.74 dB
(Adjacent Channel waiver Requested in Narrative)						
KBFF	PORTLAND	OR 238 C	75.95	0.00	170.6	-1.97 dB
(Adjacent Channel waiver Requested in Narrative)						
KITI-FM	WINLOCK	WA 236 A	44.15	0.00	343.2	10.02 dB
KNRK	CAMAS	WA 234 C2	75.95	0.00	170.6	17.25 dB
NEW	TACOMA	WA 236 D	82.22	0.00	15.9	19.94 dB
KNRK	CAMAS	WA 234 C2	75.95	0.00	170.6	19.12 dB
KNRK	CAMAS	WA 234 C2	82.54	0.00	163.1	27.43 dB
KJR-FM	SEATTLE	WA 239 C	163.78	0.00	20.0	27.54 dB
880310NB	CAMAS	WA 234 C2	93.86	0.00	137.5	28.52 dB
KITI-FM	WINLOCK	WA 236 A	37.08	0.00	350.2	28.70 dB
NEW	TUMWATER	WA 237 D	94.92	0.00	357.1	29.66 dB
KQCB-FM1	ASTORIA	OR 235 D	75.47	0.00	272.5	30.96 dB
KQCB-FM	CANNON BEACH	OR 235 C3	87.05	0.00	254.7	31.17 dB
KUOW-FM	SEATTLE	WA 235 C1	166.81	0.00	14.2	31.60 dB
NEW	TUMWATER	WA 237 D	94.92	0.00	357.1	33.64 dB
KSND	MONMOUTH	OR 236 C3	153.38	0.00	202.8	33.55 dB
KJR-FM	SEATTLE	WA 239 C	163.78	0.00	20.0	34.40 dB
KXXK	HOQUIAM	WA 237 A	108.93	0.00	322.1	35.32 dB
KBFF	PORTLAND	OR 238 C	75.83	0.00	170.7	36.66 dB
KATS	YAKIMA	WA 233 C1	185.52	0.00	76.3	38.99 dB



CL-FM Log-periodic

FM

Maximum gain: 7.0 dBd

Horizontal polarization

Vertical radiation pattern

0 degree electrical downtilt



CL-FM Log-periodic
FM

Maximum gain: 7.0 dBd
Horizontal polarization

Vertical radiation pattern
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
-90	0.030	-30.46	-23.46	0.00	-45	0.618	-4.19	2.81	1.91
-89	0.030	-30.46	-23.46	0.00	-44	0.632	-3.99	3.01	2.00
-88	0.030	-30.46	-23.46	0.00	-43	0.646	-3.79	3.21	2.09
-87	0.030	-30.46	-23.46	0.00	-42	0.661	-3.60	3.40	2.19
-86	0.030	-30.46	-23.46	0.00	-41	0.675	-3.41	3.59	2.29
-85	0.030	-30.46	-23.46	0.00	-40	0.690	-3.22	3.78	2.39
-84	0.034	-29.37	-22.37	0.01	-39	0.704	-3.05	3.95	2.48
-83	0.038	-28.40	-21.40	0.01	-38	0.716	-2.90	4.10	2.57
-82	0.042	-27.54	-20.54	0.01	-37	0.729	-2.74	4.26	2.67
-81	0.046	-26.74	-19.74	0.01	-36	0.742	-2.59	4.41	2.76
-80	0.050	-26.02	-19.02	0.01	-35	0.756	-2.44	4.56	2.86
-79	0.062	-24.15	-17.15	0.02	-34	0.767	-2.30	4.70	2.95
-78	0.074	-22.62	-15.62	0.03	-33	0.781	-2.15	4.85	3.05
-77	0.086	-21.31	-14.31	0.04	-32	0.793	-2.02	4.98	3.15
-76	0.098	-20.18	-13.18	0.05	-31	0.806	-1.88	5.12	3.25
-75	0.110	-19.17	-12.17	0.06	-30	0.817	-1.75	5.25	3.35
-74	0.126	-17.99	-10.99	0.08	-29	0.829	-1.63	5.37	3.44
-73	0.142	-16.95	-9.95	0.10	-28	0.840	-1.52	5.48	3.53
-72	0.158	-16.03	-9.03	0.13	-27	0.851	-1.41	5.59	3.63
-71	0.174	-15.19	-8.19	0.15	-26	0.862	-1.29	5.71	3.72
-70	0.190	-14.42	-7.42	0.18	-25	0.873	-1.18	5.82	3.82
-69	0.212	-13.47	-6.47	0.23	-24	0.882	-1.10	5.90	3.89
-68	0.234	-12.62	-5.62	0.27	-23	0.890	-1.01	5.99	3.97
-67	0.256	-11.84	-4.84	0.33	-22	0.899	-0.92	6.08	4.05
-66	0.278	-11.12	-4.12	0.39	-21	0.908	-0.84	6.16	4.13
-65	0.300	-10.46	-3.46	0.45	-20	0.916	-0.76	6.24	4.21
-64	0.318	-9.95	-2.95	0.51	-19	0.923	-0.69	6.31	4.27
-63	0.336	-9.47	-2.47	0.57	-18	0.931	-0.62	6.38	4.34
-62	0.354	-9.02	-2.02	0.63	-17	0.938	-0.56	6.44	4.41
-61	0.372	-8.59	-1.59	0.69	-16	0.946	-0.49	6.51	4.48
-60	0.390	-8.18	-1.18	0.76	-15	0.952	-0.42	6.58	4.55
-59	0.405	-7.84	-0.84	0.82	-14	0.958	-0.37	6.63	4.60
-58	0.421	-7.51	-0.51	0.89	-13	0.964	-0.32	6.68	4.65
-57	0.436	-7.20	-0.20	0.95	-12	0.969	-0.27	6.73	4.71
-56	0.452	-6.90	0.10	1.02	-11	0.975	-0.22	6.78	4.76
-55	0.467	-6.60	0.40	1.10	-10	0.980	-0.18	6.82	4.81
-54	0.483	-6.33	0.67	1.17	-9	0.982	-0.15	6.85	4.84
-53	0.498	-6.06	0.94	1.24	-8	0.985	-0.13	6.87	4.87
-52	0.513	-5.80	1.20	1.32	-7	0.988	-0.10	6.90	4.89
-51	0.528	-5.54	1.46	1.40	-6	0.991	-0.08	6.92	4.92
-50	0.544	-5.30	1.70	1.48	-5	0.993	-0.06	6.94	4.95
-49	0.558	-5.06	1.94	1.56	-4	0.995	-0.04	6.96	4.96
-48	0.573	-4.84	2.16	1.65	-3	0.996	-0.03	6.97	4.97
-47	0.588	-4.61	2.39	1.73	-2	0.997	-0.02	6.98	4.99
-46	0.602	-4.40	2.60	1.82	-1	0.998	-0.01	6.99	5.00
					0	1.000	0.00	7.00	5.01



CL-FM Log-periodic
FM

Maximum gain: 7.0 dBd
Horizontal polarization

Vertical radiation pattern
0 degree electrical downtilt

Angle	Field	Rel.dB	dBd	PwrMult	Angle	Field	Rel.dB	dBd	PwrMult
0	1.000	0.00	7.00	5.01	45	0.618	-4.19	2.81	1.91
1	0.998	-0.01	6.99	5.00	46	0.602	-4.40	2.60	1.82
2	0.997	-0.02	6.98	4.99	47	0.588	-4.61	2.39	1.73
3	0.996	-0.03	6.97	4.97	48	0.573	-4.84	2.16	1.65
4	0.995	-0.04	6.96	4.96	49	0.558	-5.06	1.94	1.56
5	0.993	-0.06	6.94	4.95	50	0.544	-5.30	1.70	1.48
6	0.991	-0.08	6.92	4.92	51	0.528	-5.54	1.46	1.40
7	0.988	-0.10	6.90	4.89	52	0.513	-5.80	1.20	1.32
8	0.985	-0.13	6.87	4.87	53	0.498	-6.06	0.94	1.24
9	0.982	-0.15	6.85	4.84	54	0.483	-6.33	0.67	1.17
10	0.980	-0.18	6.82	4.81	55	0.467	-6.60	0.40	1.10
11	0.975	-0.22	6.78	4.76	56	0.452	-6.90	0.10	1.02
12	0.969	-0.27	6.73	4.71	57	0.436	-7.20	-0.20	0.95
13	0.964	-0.32	6.68	4.65	58	0.421	-7.51	-0.51	0.89
14	0.958	-0.37	6.63	4.60	59	0.405	-7.84	-0.84	0.82
15	0.952	-0.42	6.58	4.55	60	0.390	-8.18	-1.18	0.76
16	0.946	-0.49	6.51	4.48	61	0.372	-8.59	-1.59	0.69
17	0.938	-0.56	6.44	4.41	62	0.354	-9.02	-2.02	0.63
18	0.931	-0.62	6.38	4.34	63	0.336	-9.47	-2.47	0.57
19	0.923	-0.69	6.31	4.27	64	0.318	-9.95	-2.95	0.51
20	0.916	-0.76	6.24	4.21	65	0.300	-10.46	-3.46	0.45
21	0.908	-0.84	6.16	4.13	66	0.278	-11.12	-4.12	0.39
22	0.899	-0.92	6.08	4.05	67	0.256	-11.84	-4.84	0.33
23	0.890	-1.01	5.99	3.97	68	0.234	-12.62	-5.62	0.27
24	0.882	-1.10	5.90	3.89	69	0.212	-13.47	-6.47	0.23
25	0.873	-1.18	5.82	3.82	70	0.190	-14.42	-7.42	0.18
26	0.862	-1.29	5.71	3.72	71	0.174	-15.19	-8.19	0.15
27	0.851	-1.41	5.59	3.63	72	0.158	-16.03	-9.03	0.13
28	0.840	-1.52	5.48	3.53	73	0.142	-16.95	-9.95	0.10
29	0.829	-1.63	5.37	3.44	74	0.126	-17.99	-10.99	0.08
30	0.817	-1.75	5.25	3.35	75	0.110	-19.17	-12.17	0.06
31	0.806	-1.88	5.12	3.25	76	0.098	-20.18	-13.18	0.05
32	0.793	-2.02	4.98	3.15	77	0.086	-21.31	-14.31	0.04
33	0.781	-2.15	4.85	3.05	78	0.074	-22.62	-15.62	0.03
34	0.767	-2.30	4.70	2.95	79	0.062	-24.15	-17.15	0.02
35	0.756	-2.44	4.56	2.86	80	0.050	-26.02	-19.02	0.01
36	0.742	-2.59	4.41	2.76	81	0.046	-26.74	-19.74	0.01
37	0.729	-2.74	4.26	2.67	82	0.042	-27.54	-20.54	0.01
38	0.716	-2.90	4.10	2.57	83	0.038	-28.40	-21.40	0.01
39	0.704	-3.05	3.95	2.48	84	0.034	-29.37	-22.37	0.01
40	0.690	-3.22	3.78	2.39	85	0.030	-30.46	-23.46	0.00
41	0.675	-3.41	3.59	2.29	86	0.030	-30.46	-23.46	0.00
42	0.661	-3.60	3.40	2.19	87	0.030	-30.46	-23.46	0.00
43	0.646	-3.79	3.21	2.09	88	0.030	-30.46	-23.46	0.00
44	0.632	-3.99	3.01	2.00	89	0.030	-30.46	-23.46	0.00
					90	0.030	-30.46	-23.46	0.00

Exhibit #12 Attachment #4

WAY Media, Inc

Scala CL-FM Log Periodic Antenna - Horizontally Polarized

Frequency = 95.1 Mhz
Interfering Contour 101.1 dBu (50,10)

ERP Watts = 4

Degrees	Rel. Field	Power	Distance to Contour	Degrees	Rel. Field	Power	Distance to Contour
1	0.998	4.0	123.3561	46	0.602	1.4	74.4092
2	0.989	3.9	122.2066	47	0.588	1.4	72.6787
3	0.996	4.0	123.1089	48	0.573	1.3	70.8247
4	0.995	4.0	122.9853	49	0.558	1.2	68.9706
5	0.993	3.9	122.7381	50	0.544	1.2	67.2402
6	0.991	3.9	122.4909	51	0.528	1.1	65.2625
7	0.988	3.9	122.1200	52	0.513	1.1	63.4085
8	0.985	3.9	121.7492	53	0.498	1.0	61.5544
9	0.982	3.9	121.3784	54	0.483	0.9	59.7004
10	0.980	3.8	121.1312	55	0.467	0.9	57.7227
11	0.975	3.8	120.5132	56	0.452	0.8	55.8687
12	0.969	3.8	119.7716	57	0.436	0.8	53.8910
13	0.964	3.7	119.1536	58	0.421	0.7	52.0370
14	0.958	3.7	118.4119	59	0.405	0.7	50.0593
15	0.952	3.6	117.6703	60	0.390	0.6	48.2053
16	0.946	3.6	116.9287	61	0.372	0.6	45.9804
17	0.938	3.5	115.9399	62	0.354	0.5	43.7556
18	0.931	3.5	115.0747	63	0.336	0.5	41.5307
19	0.923	3.4	114.0858	64	0.318	0.4	39.3058
20	0.916	3.4	113.2206	65	0.300	0.4	37.0810
21	0.908	3.3	112.2318	66	0.278	0.3	34.3617
22	0.899	3.2	111.1193	67	0.256	0.3	31.6424
23	0.890	3.2	110.0069	68	0.234	0.2	28.9232
24	0.882	3.1	109.0181	69	0.212	0.2	26.2039
25	0.873	3.0	107.9057	70	0.190	0.1	23.4846
26	0.862	3.0	106.5460	71	0.174	0.1	21.5070
27	0.851	2.9	105.1864	72	0.158	0.1	19.5293
28	0.840	2.8	103.8268	73	0.142	0.1	17.5517
29	0.829	2.7	102.4671	74	0.126	0.1	15.5740
30	0.817	2.7	100.9839	75	0.110	0.0	13.5964
31	0.806	2.6	99.6242	76	0.098	0.0	12.1131
32	0.793	2.5	98.0174	77	0.086	0.0	10.6299
33	0.781	2.4	96.5342	78	0.074	0.0	9.1466
34	0.767	2.4	94.8037	79	0.062	0.0	7.6634
35	0.756	2.3	93.4441	80	0.050	0.0	6.1802
36	0.742	2.2	91.7136	81	0.046	0.0	5.6858
37	0.729	2.1	90.1068	82	0.042	0.0	5.1913
38	0.716	2.1	88.4999	83	0.038	0.0	4.6969
39	0.704	2.0	87.0167	84	0.034	0.0	4.2025
40	0.690	1.9	85.2863	85	0.030	0.0	3.7081
41	0.675	1.8	83.4322	86	0.030	0.0	3.7081
42	0.661	1.7	81.7018	87	0.030	0.0	3.7081
43	0.646	1.7	79.8477	88	0.030	0.0	3.7081
44	0.632	1.6	78.1173	89	0.030	0.0	3.7081
45	0.618	1.5	76.3868	90	0.030	0.0	3.7081

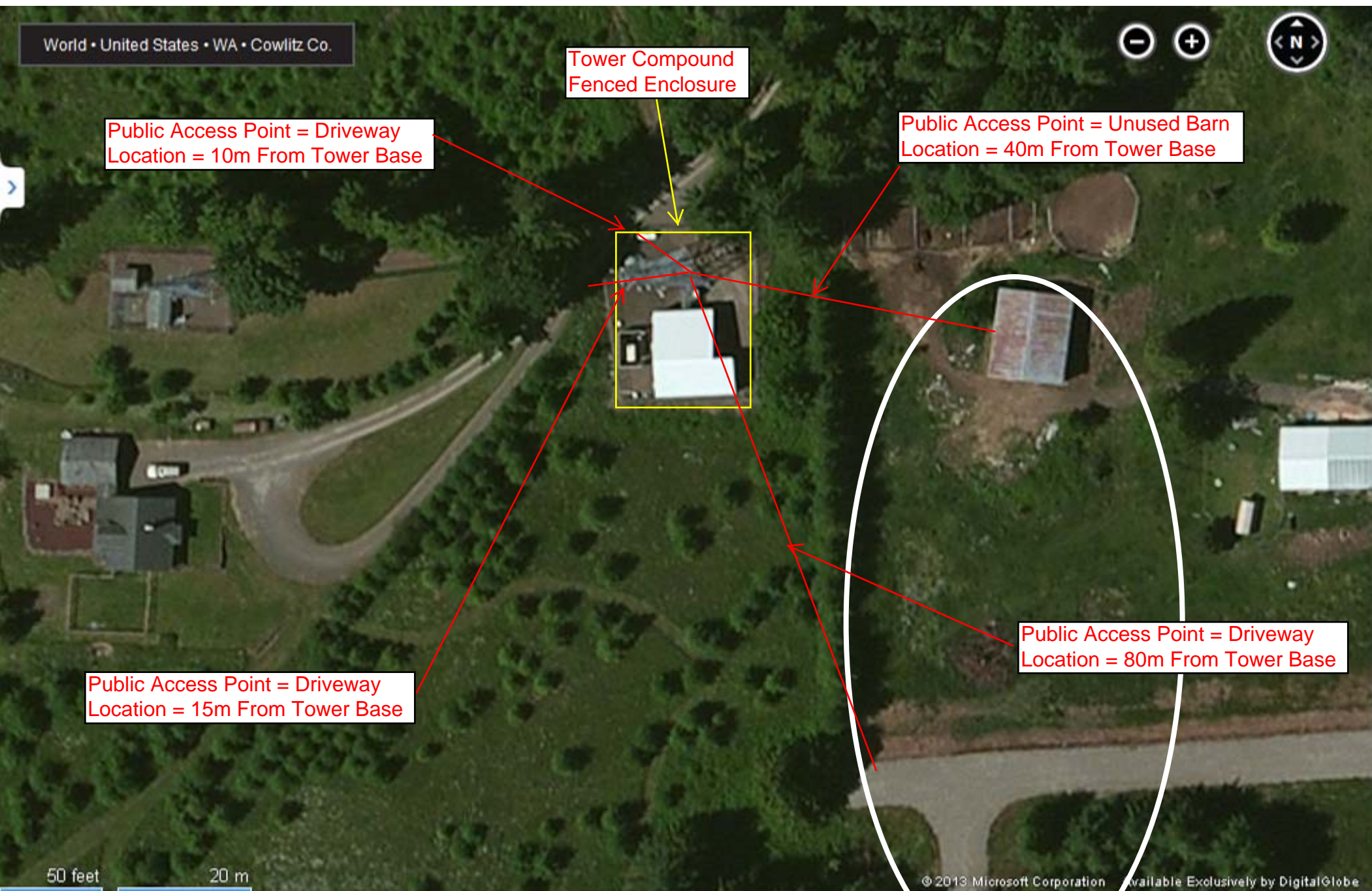
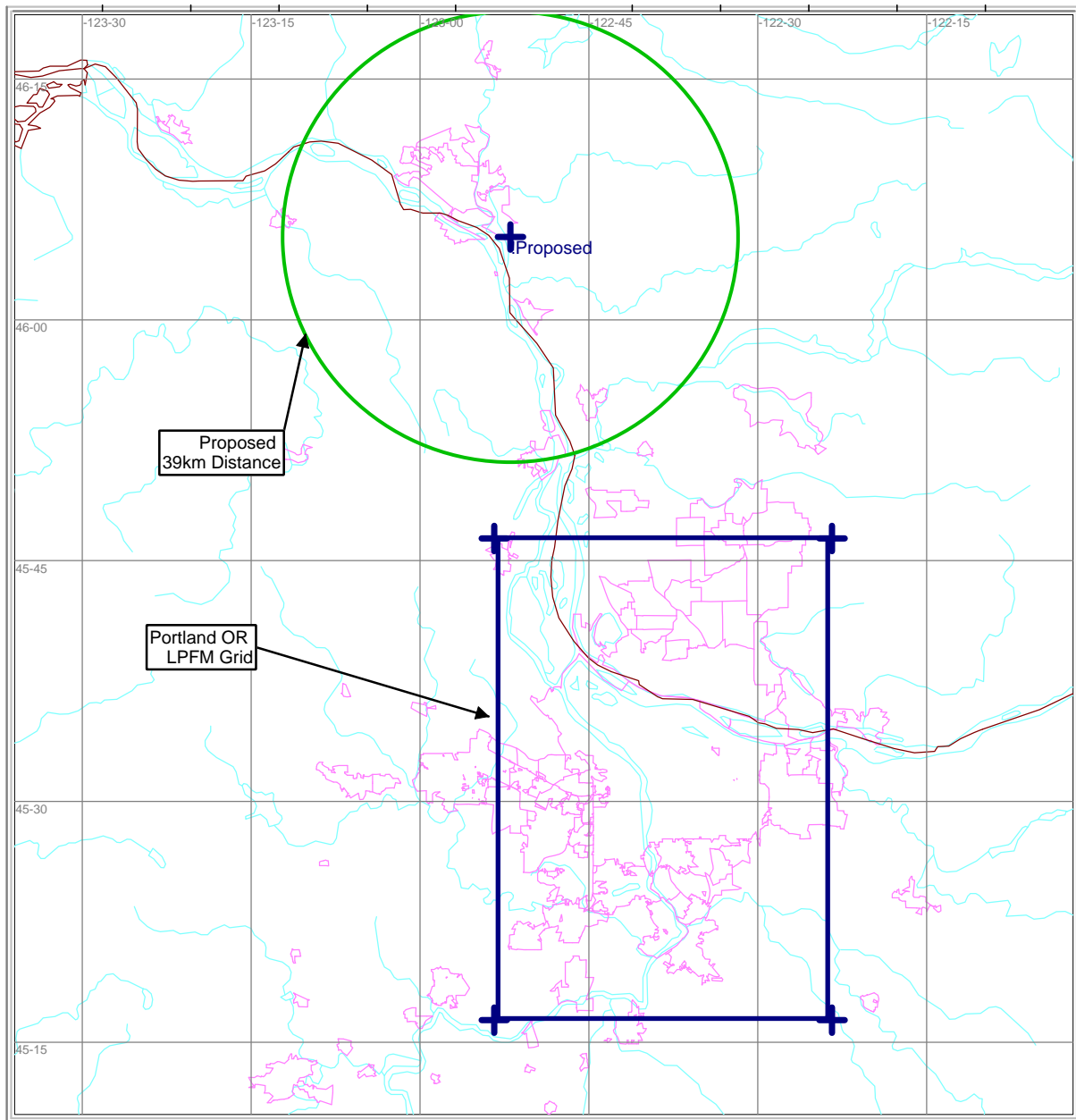


Exhibit #12 Attachment #6
WAY Media, Inc



km

State Borders City Borders Water Features Lat/Lon Grid

Map Scale: 1:765156 1 cm = 7.65 km V\H Size: 124.53 x 119.87 km