

EXHIBIT 12  
TECHNICAL STATEMENT  
W266BW WINDER, GEORGIA 266D  
YOUNGERS COLORADO BROADCASTING LLC  
FCC FORM 349  
FEBRUARY 2016

This Technical Statement is in support of a minor change application to the Construction Permit, file number BPFT-20151118AEX, being filed on behalf of Youngers Colorado Broadcasting LLC. The facility ID is 147273.

Youngers Colorado Broadcasting LLC is proposing to relocate to an existing tower site, ASR 1223132, at the coordinates N. 33°-48q26+, W. 84°-20q22+, NAD 27 on channel 266D with an Effective Radiated Power of 250 Watts. The antenna will be mounted at 291 meters Above Ground Level, with a Center of Radiation at 555 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the first and third lines of the table of Figure 1, there are apparent short spacings to W266BW, but these applications are the same facility as this proposal and will be replaced by this application. The only pertinent records for further study are:

- 1) WKHX-FM Marietta, Georgia 268C0 License
- 2) WNNX College Park, Georgia 263C2 CP and License
- 3) WLJA-FM Elijay, Georgia 266C3 CP
- 4) WTGA-FM Thomaston, Georgia 266A License
- 5) W265AV Woodstock, Georgia 265D CP

The proposed site is on the same tower as 2<sup>nd</sup> adjacent station WKHX-FM Marietta, Georgia on channel 268C0. WKHX-FM's transmits with an ERP of 100 kW, while the proposed operation of W266BW will transmit with an ERP of 0.25 kw. Therefore the interfering signal contours F(50-10) generated by the proposed facility will never be

greater, much less 40 dB greater, than the predicted F(50-50) field strength of WKHX-FM. Therefore, there is no area of interference to WKHX-FM, much less population in the area of interference.

The proposed site is located within the protected 60 dB contour of 3<sup>rd</sup> adjacent WNNX College Park, Georgia on channel 263C2. The predicted F(50-50) field strength at the proposed FM translator site is 96.9 dB and the maximum distance to the interference contour is 15.9 meters from the transmitter. Because the transmitter is on the tower 291 meters above ground, the interference zone does not reach within 275 meters of the ground and there is no population in the area of interference.

The applicant, Youngers Colorado Broadcasting LLC, 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 any area of predicted interference to WKHX-FM or WNNX.

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 the CP for WLJA-FM Elijay, Georgia on channel 266C3. As can be seen, there is no prohibited overlap between these two contours.

Figures 3 and 4 are predicted coverage maps showing the 40 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of WTGA-FM Thomaston, Georgia on channel 266A. Figure 4 is a magnification of Figure 3. As can be seen, there is no prohibited overlap between these two contours.

Figures 5 and 6 are predicted coverage maps showing the 54 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of W265AV Woodstock, Georgia. Figure 6 is a magnification of Figure 5. As can be seen, there is no prohibited overlap between these two contours.

Figure 7 shows the overlap between the 60 dB contours of the proposed facility, in red, and the current licensed facility.

The proposed operation of W266BW will operate as a fill-in translator rebroadcasting WSTR Smyrna, Georgia, facility ID #30822. Figure 8 shows that the 60 dB contour of the proposed operation of W266BW, in red, is entirely within the 60 dB contour of WSTR, in blue.

It was concluded that the proposed operation of W266BW Winder, Georgia on 266D 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.