

Exhibit 12

**Modify FM Translator K235DB
CH 235D (94.9 MHz) - 0.250 kW Hatfield, AR
to
Proposed CH235D (94.9 MHz) - 0.250 kW Mena, AR**

October 25, 2021

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Community Radio, Inc., (“Community”), licensee of FM translator station K235DB, Channel 235D, Facility ID No. 22395, Hatfield, AR. Community proposes to modify K235DB to a different transmit location. The proposed new location is an existing tower at Mena, AR. The proposed K235DB facility would operate with 250 watts ERP non-directional with vertical polarization at 23 meters above ground and 35.58 HAAT. The modified K235DB will be used as a non fill-in translator for KAWX-LP, Channel 226L1 (93.1 MHz) Facility ID No. 193104, licensed to Mena, AR. Community is the licensee of KAWX-LP and therefore retransmission consent is not required.

A channel study using Section 73.207 separation distances for Class A FM stations. This channel study is provided as a courtesy to FCC staff to help identify potential contour overlap issues. Exhibits demonstrates Section 74.1204 contour protection to co-channel full power FM stations KHKN Channel 235C, Maumelle, AR and KRMW Channel 235C2, Cedarville, AR and first adjacent channel LPFM station KPGC-LP, Channel 236L1, Norman AR. Another exhibit demonstrates compliance with Section 74.1233(a) Common Overlap.

A study has been undertaken to show the proposed K235DB facility is in compliance with the Commission’s environmental and radio frequency emission limits and is attached an exhibit.

K235DB

Mena, AR

Latitude: 34-35-34.50 N

Longitude: 094-14-29.50 W

ERP: 0.25 kW

HAAT: 34.58 m

Channel: 235

Frequency: 94.9 MHz

AMSL Height: 416.8 m

Elevation: 393.8 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model: None

K235DB

Hatfield, AR

BLFT20190716AAQ

Latitude: 34-30-16.40 N

Longitude: 094-22-40.80 W

ERP: 0.25 kW

HAAT: 0.0 m

Channel: 235

Frequency: 94.9 MHz

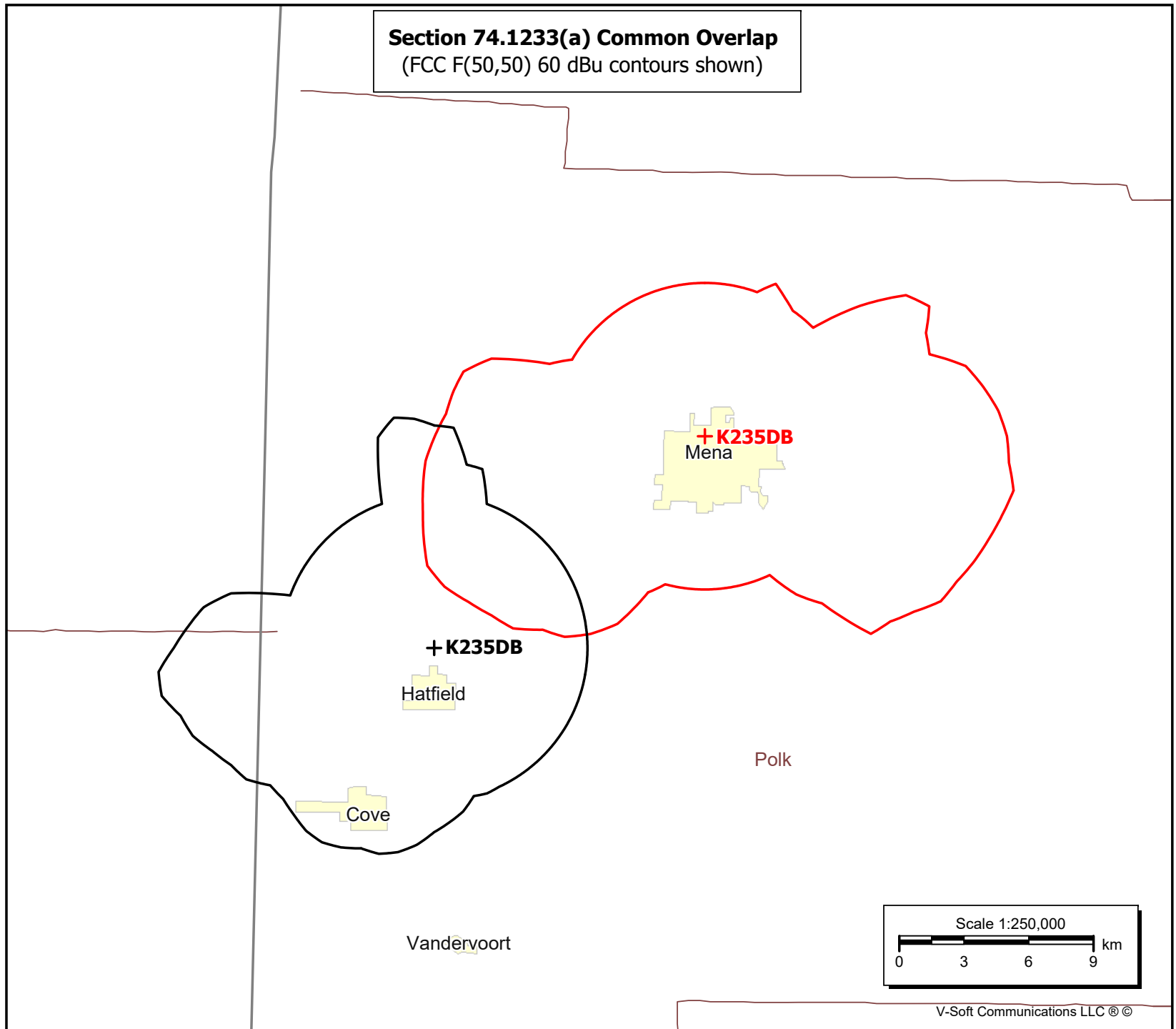
AMSL Height: 359.0 m

Elevation: 327.0 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model: None

Section 74.1233(a) Common Overlap
(FCC F(50,50) 60 dBu contours shown)

K235DB Mod to Mena

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REFERENCE                                     DISPLAY DATES
34 35 34.5 N.                               CLASS = A   Int = AA   DATA 10-24-21
94 14 29.5 W.                               Current Spacings to 3rd Adj.  SEARCH 10-24-21
----- Channel 235 - 94.9 MHz -----
Call      Channel  Location      Azi      Dist      FCC      Margin
      Lat.      Lng.      Ant      Power      HAAT
-----
K235DB    LIC    235D    Hatfield      AR    231.9    15.9    84.5    -68.6
34 30 16.4    94 22 40.8    VN      0.250 kW    0 M
      Community Radio, Inc.      BLFT20190716AAQ

KHKN      LIC    235C    Maumelle      AR    94.6    186.6    225.5    -38.9
34 26 31.3    92 13 03.5    CN      100.000 kW    562 M
      Ihm Licenses, LLC      BLH19920326KC

Note: See Section 74.1204 Contour Protection - KHKN & KRMW

KRMW      LIC    235C2    Cedarville      AR    354.8    140.1    165.5    -25.4
35 51 00.3    94 22 59.8    CN      21.000 kW    231 M
      Cumulus Licensing LLC      BLH20111209CDV

Note: See Section 74.1204 Contour Protection - KRMW

KPGC-LP   LIC    236L1    Norman      AR    106.0    54.1    55.5    -1.4
34 27 27.0    93 40 31.9    CN      0.090 kW    32 M
      His Will, Inc.      BLL20170123GET

Note: See Section 74.1204 Contour Protection - KPGC-LP

KYHD      LIC-N 234C3    Valliant      OK    228.7    100.2    88.5    11.7
33 59 43.3    95 03 27.8    NCN      25.000 kW
      70 M
      Payne, Will      BLH20140725ABB

KERX      LIC    237C2    Paris      AR    12.8    79.0    54.5    24.5
35 17 13.3    94 02 51.7    CN      50.000 kW    140 M
      Pearson Broadcasting Of Pa      BLH20020418AAQ

KFPW-FM   LIC-N 233C3    Barling      AR    351.5    75.4    41.5    33.9
35 15 54.3    94 21 52.8    NCN      18.500 kW    82 M
      Pharis Broadcasting, Inc.      BLH20050202ACE

KEWL-FM   LIC-N 236C3    New Boston    TX    187.3    129.2    88.5    40.7
33 26 15.4    94 25 11.7    NCN      25.000 kW    99 M
      American Media Investments      BLH19950714KA

KQCV-FM   LIC    236C    Shawnee      OK    291.5    209.0    164.5    44.5
35 15 47.3    96 22 44.0    CN      100.000 kW    306 M
      Community Broadcasting, In      BMLED20030319ACZ

K235AW    LIC    235D    Antlers      OK    252.6    133.3    84.5    48.8
34 13 35.4    95 37 20.9    CN      0.250 kW    54 M
      Payne Media Group LLC      BLFT20070625ACW
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K235DB

Mena, AR
Latitude: 34-26-31.30 N
Longitude: 092-13-03.50 W
ERP: 0.25 kW
HAAT: 35.58 m
Channel: 235
Frequency: 94.9 MHz
AMSL Height: 646.0 m
Elevation: 104.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

KHKN

Maumelle, AR
BLH19920326KC
Latitude: 34-26-31.30 N
Longitude: 092-13-03.50 W
ERP: 100.00 kW
HAAT: 562 m
Channel: 235
Frequency: 94.9 MHz
AMSL Height: 646.0 m
Elevation: 104.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

KRMW

Cedarville, AR
BLH20111209CDV
Latitude: 35-51-00.30 N
Longitude: 094-22-59.80 W
ERP: 21.00 kW
HAAT: 230.9 m
Channel: 235
Frequency: 94.9 MHz
AMSL Height: 661.0 m
Elevation: 536.4 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

FCC Contours Legend

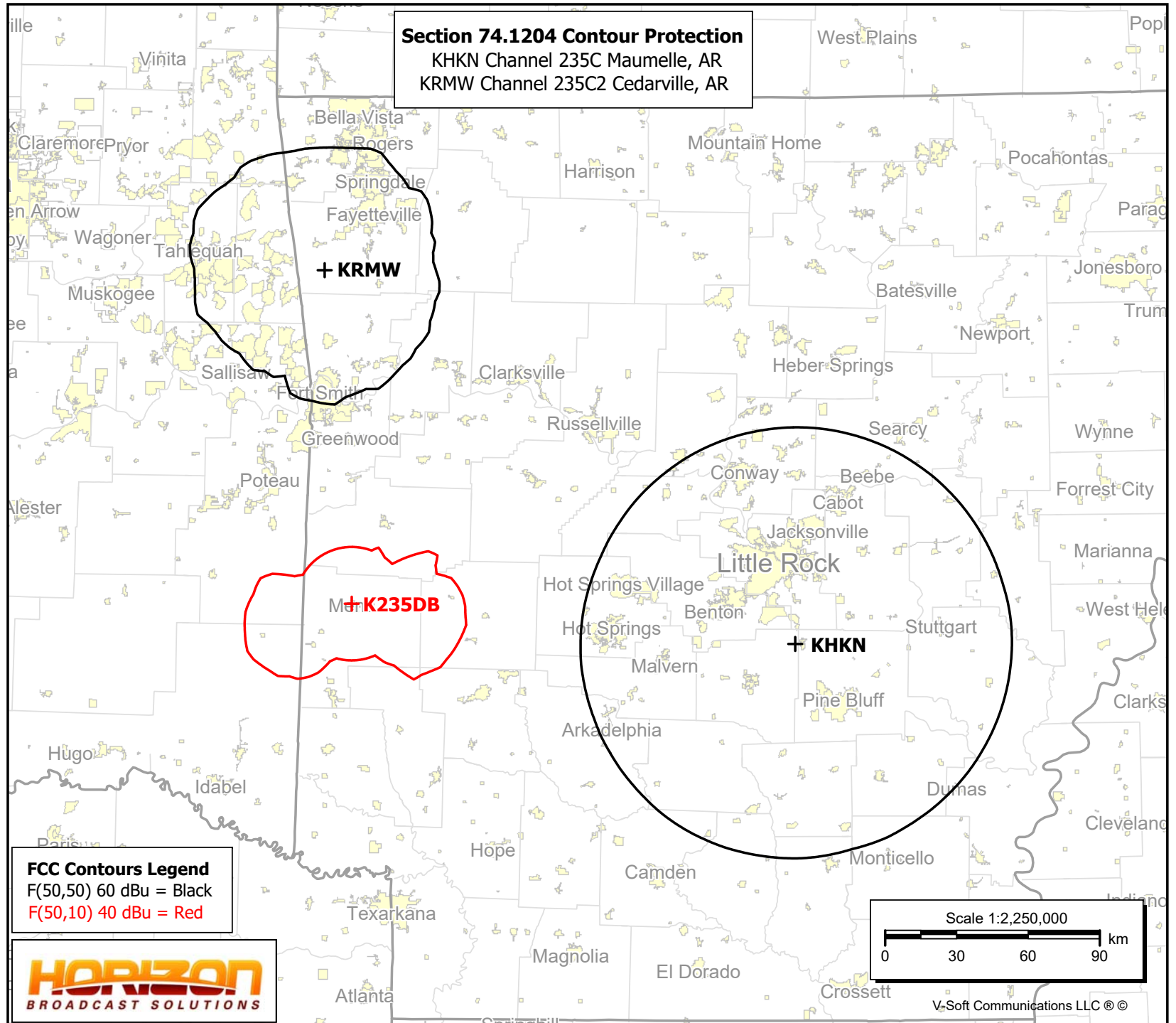
F(50,50) 60 dBu = Black

F(50,10) 40 dBu = Red

HORIZON
BROADCAST SOLUTIONS

Section 74.1204 Contour Protection

KHKN Channel 235C Maumelle, AR
KRMW Channel 235C2 Cedarville, AR

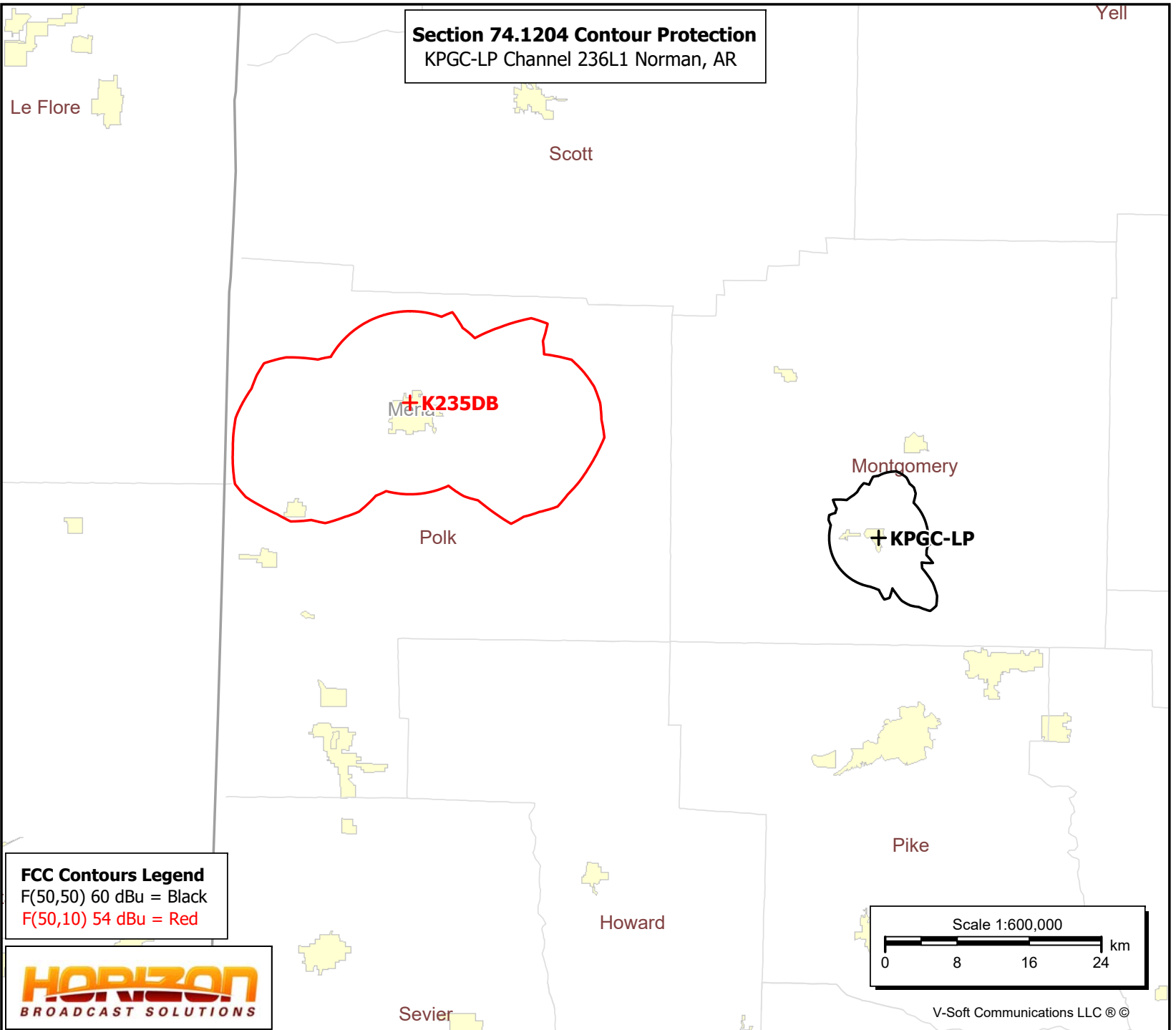


K235DB

Mena, AR
Latitude: 34-27-27 N
Longitude: 093-40-31.90 W
ERP: 0.25 kW
HAAT: 35.58 m
Channel: 236
Frequency: 95.1 MHz
AMSL Height: 297.2 m
Elevation: 265.2 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

KPGC-LP

Norman, AR
BLL20170123GET
Latitude: 34-27-27 N
Longitude: 093-40-31.90 W
ERP: 0.09 kW
HAAT: 32 m
Channel: 236
Frequency: 95.1 MHz
AMSL Height: 297.2 m
Elevation: 265.2 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None



**Human Exposure to Radiofrequency Electromagnetic Field
&
Section 106 Compliance
(Environmental)**

A study has been made to determine whether this proposal is in compliance with 47 C.F.R. 1.1307 of the Commission's rules and with OET Bulletin #65, dated August 1997, regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. Community Radio, Inc., licensee of FM translator K235DB, Facility ID No. 22395, Hatfield, Arkansas seeks to modify K235DB by moving a new transmit location at Mena, AR. The transmitting site is an existing tower 24.4 meters in overall height and is registered with FCC Antenna Structure Registration (ASR) number 1301080. The tower is located at 34° 35' 34.5" N ~ 94° 14' 29.5" W (NAD 83). The proposed antenna will be a side mounted Telewave ANT90D one bay vertically polarized antenna. The proposed K235DB facility would operate with 250 watts ERP non-directional at 23 meters above ground level and 35.58 meters HAAT. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of § 1.1306 of the FCC Rules. Because K235DB proposes to operate from an existing site and no changes to the site are proposed therefore, it is believed to be exempt from a Section 106 review by the SHPO/THPO.

The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. The recently revised FM Model Program does not include the Telewave antenna. Therefore Type One, ring and stub, or any type not otherwise described was selected. Using the Type One antenna selection, the maximum calculated signal density near the tower at two meters above ground level attributable to the proposed facility is $18.052 \mu\text{W}/\text{cm}^2$ at 4.8 meters, which is 9.026 percent of the general population/uncontrolled maximum permitted exposure limit.

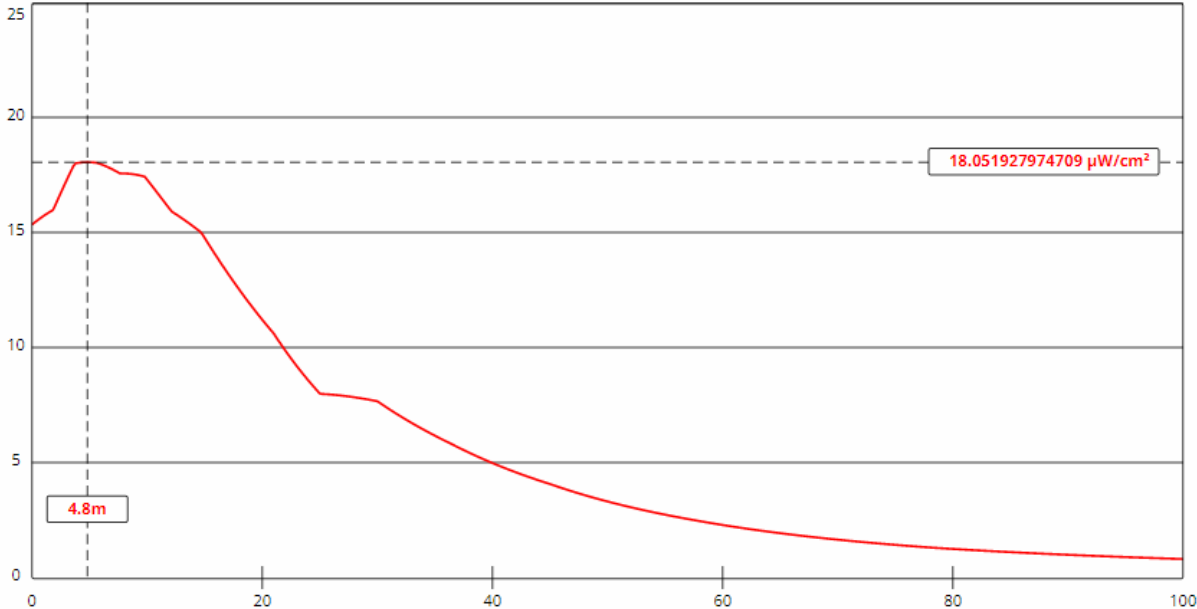
The applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

FM Model

- Radio Frequency Safety
- FCC Policy on Human Exposure
- RF Safety FAQ
- Body Tissue Dielectric Parameters
- RF Safety Highlighted Releases
- FM Model

The FM Model calculator determines the potential exposure from radiofrequency (RF) electromagnetic fields produced by FM broadcast station antennas at ground level. The FM Model software was originally developed by the FCC in 1997 as a standalone executable program and this improved version provides more precise predictions and runs via a JavaScript enabled web browser. The FM Model is originally based on measured data published in 1985 by the EPA.

▼ Show More.....



View Tabular Results +

Channel Selection	Channel 235 (94.9 MHz) ▼		
Antenna Type +	EPA Type 1: Ring-and-Stub or "Other" ▼		
Height (m)	<input type="text" value="23"/>	Distance (m)	<input type="text" value="100"/>
ERP-H (W)	<input type="text" value="0"/>	ERP-V (W)	<input type="text" value="250"/>
Num of Elements	<input type="text" value="1"/>	Element Spacing (λ)	<input type="text" value="1"/>
Num of Points	<input type="text" value="500"/>	<input type="button" value="Apply"/>	