

EXHIBIT 12

There is a problem with our application for channel 261 in Anchorage. It cannot satisfy 74.1204 protection requirements under any circumstance. When originally applied for in 2003 there were no interfering issues using 74.1204 with the selected channel. In 2010 a full power class C3 station began broadcasting on channel 263, the second adjacent channel. This made it impossible to locate channel 261 anywhere in the Anchorage area.

Surprisingly it appears that channel 260 appears to be able to fit in and provide sufficient protection for Co-channel ,first adjacent and second adjacent channels. This would require a change of channel assignments that we do not believe can be done with this filing.

We would ask the Commission to allow us to file an amended form 349 with a channel change and sufficient engineering to satisfy 74.1204.