

EXHIBIT 12

**NEW FM Translator Station
BNPFT-20180130AGR
Proposed CH 271D – 102.1 MHz – 0.250 kW DA
Buckeye, Arizona
May 7, 2018**

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Farmworker Educational Radio Network, Inc., ("FERNI"), licensee of Class B AM Station KNAI 860 kHz, Facility ID No. 1326, Phoenix, AZ. FERNI herein is filing an FCC Long Form 349 to complete application BNPFT-20180130AGR for a new FM translator at Buckeye, AZ. KNAI 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 KNAI(AM), licensed to Phoenix, AZ. The proposed new facility would operate on Channel 271D (102.1 MHz) with 250 watts directional with the transmit antenna located at 36 meters height above ground level and 716 meters HAAT. Exhibit 10 demonstrates that the proposed FCC F(50,50) 60 dBu contour of the new facility is contained within the KNAI 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 271 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 co-

channel full power FM station KAHM, Channel 271C, Spring Valley, AZ. Exhibit 13-C shows Section 74.1204 contour protection to second adjacent channel full power FM station KNIX-FM Channel 273C, Phoenix and third adjacent full power FM Station KALV-FM, Channel 268C, Phoenix, AZ. Exhibit 13-D shows Section 74.1204 contour protection to first adjacent FM translator K270BZ, Channel 270D, Phoenix, AZ. Exhibit 16 demonstrates that the FCC F(50,50) 60 dBu contours of the proposed new Channel 271D facility and K270BZ do not overlap. KNAI(AM) is also the primary station for K270BZ. This FCC Long Form 349 makes a slight change to the transmitter site location. This change is only 0.2 km. and therefore easily qualifies per the FCC's minor modification rules for FM translators.

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