

## **EXHIBIT 12**

**Modify FM Translator K234CI Construction Permit BNPFT-20130829AHY  
CH 234D 94.7 MHz – 0.25 kW ERP Marion, TX**

**to**

**Proposed CH 234D – 94.7 MHz – 0.25 kW ERP - Marion, TX**

**February 10, 2014**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Frank G McCoy ("McCoy"), permittee of FM translator K234CI, Facility ID No. 142569, Channel 234D, Marion, Texas.

McCoy herein proposes to modify the existing K234CI construction permit BNPFT-20130829AHY by relocating to a new transmitting location and continuing to operate on Channel 234 (94.7 MHz) with 250 watts ERP with a directional antenna. The proposed facility will operate on Channel 234D (94.7 MHz) with 250 watts ERP at 21 meters height above average terrain. K234CI construction permit BNPFT-20130829AHY will be used as a fill-in translator for KZAR Channel 249C1, Facility ID No. 25588, licensed to McQueeney, Texas. McCoy has obtained permission to retransmit KAZR from Educational Media Foundation, licensee of KZAR. Exhibit 10 is a map which shows compliance with FCC Section 74.1201(g) by demonstrating that the proposed K234CI modification of construction permit BNPFT-20130829AHY FCC F(50,50) 60 dBu contour is contained inside the licensed KZAR FCC F(50,50) 60 dBu contour.

Exhibit 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. This channel study is provided as a courtesy to Commission staff to help identify potential contour overlap with other FM facilities.

Exhibit 13-B shows contour protection to KAMX, Channel 234C0, Luling, TX.

The BNPFT-20130829AHY FCC F(50,10) 40 dBu contour does not overlap with the KAMX FCC F(50,50) 60 dBu contour.

Exhibit 13-C shows contour protection to KEMA, Channel 233C2, Three Rivers, TX.

The BNPFT-20130829AHY FCC F(50,10) 54 dBu contour does not overlap with the KEMA FCC F(50,50) 60 dBu contour.

Exhibit 13-D shows contour protection to KGSX, Channel 236C1, Comfort, TX and KTFM Channel 231C2, Floresville, TX. The proposed K234CI CP modification FCC F(50,10) 100 dBu contour does not overlap with the KGSX or KTFM FCC F(50,50) 60 dBu contours.

Exhibit 13-E shows compliance with Section 74.1233(a) (Common Overlap). The FCC F(50,50) 60 dBu contours of the current on-file application and the proposed amendment overlap.

No interference will be created with or received from any existing translator station or low power FM (LPFM) facility.

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