

## **EXHIBIT 12**

**Modify W298AV FM Translator Station  
Proposed CH 298D – 107.5 MHz – 0.250 KW  
Englewood, Florida  
May 25, 2013**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Kenneth W. Kuenzie, ("Kuenzie"), licensee of FM translator station W298AV, Channel 298D, Facility ID# 140474, Englewood, Florida.

Kuenzie herein proposes to modify the existing license of W298AV by increasing the effective radiated power from 80 watts to 250 watts. The proposal would leave W298AV at the same tower which is associated with Antenna Structure Registration ("ASR") number 1271288, operating on Channel 298D (107.5 MHz), and increasing the effective radiated power to 250 watts at 54.8 meters HAAT. The modified W298AV will be used as a fill-in translator for WENG(AM), 1530 KHz, Facility ID Number 47033, licensed to Englewood, FL. Kuenzie has obtained permission to retransmit WENG(AM) from Viper Communications, Inc. , licensee of WENG(AM).

Exhibit 10 is a map depicting that the proposed W298AV 60 dBu contour is contained inside the licensed WENG(AM) 2.0 mV/M daytime contour and does not extend more than 40 km. Therefore it is believed the proposed W298AV facility is in compliance with Section 74.1201(g) with respect to fill-In translators.

Exhibit 13-A is a channel study using Section 73.207 spacings for Class A FM stations.

This study is provided as a convenience to help identify stations that could potentially receive interference from the proposed W298AV modification.

Exhibit 13-B shows the proposed W298 modification will not create interference with WXGL, Channel 297C1, St. Petersburg, FL.

Exhibit 13-C is a comprehensive exhibit to demonstrate that the W298AV modification will not cause prohibited interference to WSRZ-FM, Channel 300C2, Coral Cove, FL. The WSRZ-FM F(50,50) protected contour at the W298AV application site is 75.65 dBu. Therefore the W298AV F(50,10) interfering contour with respect to WSRZ--FM is the 115.65 dBu. Using the FCC's FM propagation curves program, the 115.65 dBu contour was calculated to extend 184 meters from the base of the tower. Additional studies were conducted using the vertical elevation pattern data obtained from Nicom for the BKG77 4 bay half wave antenna. See the attached spreadsheet and chart for the Nicom BKG77 antenna. Although the 115.65 dBu interfering contour does reach the ground over a small area around the base of the transmit tower. This area of interference extends 61.8 meters from the tower base and there is no population located in the interference area. The exhibit includes Google Earth photographs that clearly show there are no buildings within 62 meters of the tower base. It is believed that this proposed modification cause not cause prohibited interference to WSRZ-FM.

Exhibit 13-D shows the proposed W298 modification will not create interference with BNPFT-20030317HFI, Channel 296D, Port Charlotte, FL.

Because there is no change in the transmit site being proposed for W298AV, no exhibit is included to show compliance with Section 74.123(a) Common Overlap.

The proposed W298AV facility will not result in prohibited contour overlap with any full power FM, FM translator or LPFM station.

A study has been undertaken to show the proposed W298AV facility is in compliance with the Commission's radio frequency emission limits and environmental policies and is attached as Exhibits 17-A and 17-B.