

## **EXHIBIT 12**

### **Modify FM Translator W228CX CH228D - 93.5 MHz .002 kW Indianapolis, IN**

### **Proposed W228CX - CH 228D – 93.5 MHz – 0.250 KW Indianapolis, IN**

**July 15, 2017**

#### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Emmis Radio License, LLC (“Emmis”), licensee of FM translator W228CX, Facility ID number 150595, Channel 228D, Indianapolis, Indiana.

Emmis herein proposes to modify W228CX by relocating an existing tower 211.5 meters in overall height associated with ASR# 1029545. The proposed antenna center of radiation height above ground level will be 195 meters. The effective radiated power will be increased to 250 watts directional with vertical polarization. W228CX will continue to be used as a fill-in translator for WFNI(AM), 1070 kHz, Facility ID number 19521, licensed to Indianapolis, IN. Emmis is the licensee of WFNI(AM).

Exhibit 10 demonstrates compliance with FCC Section 74.1201(g). The proposed W228CX FCC F(50,50) 60 dBu contour is contained inside the primary station WFNI(AM) 2.0 mV/m daytime contour. 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 W228CX modification. Exhibit 13-B demonstrates Section 74.1204 contour protection to second adjacent channel full power FM station WIBC,

Channel 226B, Indianapolis, IN under Section 74.1204. Exhibit 13-C demonstrates Section 74.1204 contour protection to second adjacent channel full power FM station WRWM, Channel 230B1, Lawrence, IN. Exhibit 13-D demonstrates Section 74.1204 contour protection to co-channel full power FM stations WMXQ, Channel 228A, Hartford City, IN and WKHY, Channel 228A, Lafayette, IN. Exhibit 13-E demonstrates compliance with Section 74.1233(a)(1) "Common Overlap". The FCC F(50,50) 60 dBu contours of the licensed and proposed W228CX facilities overlap. The proposed W228CX facility will not create interference with any full power FM, FM translator or LPFM stations.

A study has been undertaken to show the proposed W228CX facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.