

EXHIBIT 12  
TECHNICAL STATEMENT  
CLEVELAND, OHIO 229D  
KEVIN J. YOUNGERS  
FCC FORM 349  
NOVEMBER 2013

This Technical Statement is in support of an amendment to a minor change application, BNPFT-20130820ACA, FCC form 349, being filed on behalf of Kevin J. Youngers in regards to a new FM translator for Milwaukee, Wisconsin, facility ID 157726.

Kevin J. Youngers is proposing to change channels from 283D to 229D and use a Nicom BKG77 with an Effective Radiated Power of 27 Watts. The antenna will be mounted at 89 meters Above Ground Level with a Center of Radiation at 267 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the third line of the table of Figure 1, there is an apparent short spacing, but this is the same facility as this proposal and will be replaced by this application. The only pertinent records for further study are:

- 1) WZAK Cleveland, Ohio 226B License
- 2) WQGR North Madison, Ohio 229A License

The proposed site is located within the protected contours of 3<sup>rd</sup> adjacent station WZAK Cleveland, Ohio on channel 226B. The predicted F(50-50) field strength of WZAK at the proposed transmitter site is 77.3 dB . Therefore, the predicted interfering signal contour F(50-10) generated by the proposed facility to WZAK is an additional 40 dB at 117.3 dB . The maximum distance to the 117.3 dB interference contour is 49.7 meters. Because the transmitter is on the tower 89 meters above ground, the interference zone does not reach within 39 meters of the ground and there is no population in the area of interference. The applicant, Kevin J. Youngers, respectfully requests a waiver of C.F.R.

74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference.

Figure 2 is a predicted coverage map showing the 40 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of WQGR North Madison, Ohio on channel 229A. As can be seen, there is no prohibited overlap between these two contours.

Figure 3 shows the overlap between the 60 dB contours of the proposed facility, in red, and the current tech box, in blue, seeking to be modified by this application.

This proposal meets Section 4 of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement between the Government of Canada and the Government of the United States of America relating to the FM Broadcasting Service. The ERP at 27 Watts does not exceed 50 Watts. Figure 4 shows that the proposed 34 dB interference contour F(50,10) does not come near the common border of Canada and the United States.

It was concluded that the proposed operation of a new translator in Cleveland, Ohio on 229D will not cause any harmful interference to any existing stations and will be in full compliance with the Commission's rules. Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.