

## **EXHIBIT 12**

**Modify FM Translator W277CV construction permit BPFT-20160106ABI  
Channel 277D - 103.3 MHz – 0.12 kW ERP - South Milwaukee, WI to  
Proposed Channel 277D – 103.3 MHz – 0.25 kW - Milwaukee, WI**

**March 28, 2017**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Frank G. McCoy ("McCoy"), licensee of FM translator W277CV, Channel 277D, Facility ID No. 156555, Waukegan, Illinois.

McCoy herein proposes to modify W277CV construction permit BPFT-20160106ABI by relocating to an existing tower at Milwaukee, WI. The tower is associated with ASR #1047092 and is 373.7 meters in overall height. The proposed W277CV will operate with 250 watts ERP non-directional at 269 meters above ground level and 257.5 meters height above average terrain. The modified W277CV will be used as a fill-in translator for WRRD(AM), 1510 kHz, Facility ID number 70771, licensed to Waukesha, WI. McCoy has obtained written consent to retransmit WRRD(AM) from Good Karma Broadcasting, LLC and New WRRD, LLC. Good Karma Broadcasting, LLC filed a voluntary assignment of the license of WRRD(AM) to WRRD, LLC on February 7, 2017 and that application is pending. McCoy is requesting a waiver of FCC Section 74.1223(a)(1), commonly referred to as the *Mattoon Waiver*. An exhibit demonstrating that this construction permit modification for W277CV is eligible for a waiver of Section 74.1233(a)(1) is included as Exhibit 13-H.

Exhibit 10 demonstrates compliance with FCC Section 74.1201(g). The proposed W277CV FCC F(50,50) 60 dBu contour is contained within the primary station WRRD(AM) 2.0 mV/m daytime contour. There is an area of the W277C FCC F(50,50) 60 dBu contour that extends outside the 25 mile radius from WRRD. However the area falls entirely over water (Lake Michigan) and therefore is permitted.

Exhibit 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. This study is provided as a convenience for FCC staff. Exhibit 13-B shows Section 74.1204 contour protection to WXSS, Channel 279B, Wauwatosa, WI. The Board of the Whitefish Bay School District is permittee of construction permit BNPL-20131114BET for the formerly assigned call sign WFBW-LP, Facility ID No. 196705, Channel 277L1, Whitefish Bay, WI. Exhibit 13-C consists of two documents from the public document archive of the Whitefish Bay, Wisconsin School District indicating their passage of a Board resolution to forgo construction of a low powered FM station and to immediately return the construction permit to the FCC for cancellation and to request the callsign be deleted. McCoy believes the FCC is in receipt of such communication from the school Board but provides this additional documentation in the interest of completeness. McCoy respectfully requests that this W277CV Form 349 construction permit modification application be held in queue per FCC Section 73.3573 "Processing FM broadcast station applications", pending either the cancellation of the Whitefish Bay LPFM construction permit or its expiration on October 16, 2017. Exhibit 13-D shows Section 74.1204 contour protection to WHQG, Channel 275B, Milwaukee,

WI. Exhibit 13-E is a letter from Gateway Technical College, permittee of construction permit BPFT-20151130AAK for W277BM, Facility ID No. 147272, Waukesha, WI seeking cancellation of the permit. McCoy respectfully requests that this W277CV Form 349 construction permit modification application be held in queue per FCC Section 73.3573 pending the cancellation of the W277BM construction permit BPFT-20151130AAK. Exhibit 13-F shows contour protection to the licensed facility of W277BM, Channel 277D, Lake Geneva, WI. Exhibit 13-G shows contour protection to W277BR, Channel 277D, Sheboygan, WI. Exhibit 13-H is a request for a waiver of Section 74.1233(a)(1) by means of a *Mattoon Waiver*. No interference will be caused to or received from any existing translator station or low power FM (LPFM) facility.

A study has been undertaken to show the proposed W277CV facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.