

EXHIBIT 12

**Modify FM Translator W278BS Lucas, Ohio
CH278D - 103.5 Mhz - 0.055 kW**

**Proposed CH 299D – 107.7 MHz – 0.250 KW
Newark, Ohio**

February 4, 2016

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Runnymede, Inc. ("Runnymede"). Runnymede has entered into an agreement to purchase FCC construction permit BNPFT-20130814AAT for FM translator station W278BS, Facility ID #138224, Channel 299D, Lucas, OH from Mansfield Christian School. Runnymede proposes to modify W278BS in the first AM Filing Window for Class C and D AM stations. The proposed primary station WHTH(AM) is a Class D AM station and is thus qualified to participate. Runnymede herein proposes a minor change application FCC Form 349 to modify W278BS to specify operation on channel 299D (107.7 MHz) and operate with 250 watts ERP at 32 meters HAAT from a new transmitter location at Newark, Ohio.

The proposed W278BS facility will be used as a fill-in translator for primary station WHTH(AM) Facility No. 57937, 790 KHz, licensed to Heath, OH, of which Runnymede is the licensee. Exhibit 10 demonstrates that the proposed W278BS FCC F(50,50) 60 dBu contour is contained within the WHTH(AM) FCC 2.0 mV/M daytime contour and no part of the proposed W278BS FCC F(50,50) 60 dBu contour extends more than 25

miles from the WHTH(AM) transmitter site. Therefore it is believed that this application is in compliance with Section 74.1201(g) of the Commission's rules.

Exhibit 13-A is a channel study and assumes a Class A 6 kW facility operating on channel 259 and is provided as a courtesy to FCC staff to help identify possible contour overlap issues under Section 74.104. Exhibit 13-B shows Section 74.1204 contour protection to WSEO Channel 299A Nelsonville, OH and WXXF, Channel 299A, Loudonville, OH. Exhibit 13-C shows Section 74.1204 contour protection to WVMX Channel 300A Westerville, OH and WCKX Channel 298A Columbus, OH. Exhibit 13-D shows Section 74.1204 contour protection to WMMX Channel 299B Dayton, OH.

An exhibit demonstrating compliance with Section 74.1233(a) "Common Overlap" is not included. However, Exhibit 13-F demonstrates the current W278BS construction permit and proposed W278BS modification are located within 250 miles of each other.

No interference will be caused to or received from any low power FM (LPFM) facility.

A study has been undertaken to show the proposed W278BS facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.