

## **EXHIBIT 12**

**Modify K224AP FM Translator Station  
92.7 MHz – 0.056 kW ERP Fort Smith, AR  
to  
Proposed CH 226D – 93.1 MHz – 0.250 KW @ Fort Smith, AR**

**February 19, 2013**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Fred H. Baker, Jr. ("Baker"), licensee of FM translator station K224AP, Channel 224D, Fort Smith, Arkansas. The current licensed site of K224AP is located in Sebastian County, Arkansas, which is part of the Fort Smith, AR Arbitron Metro. Fort Smith is Arbitron metro rank #158 and was not included in Appendix A, the list of 156 Arbitron metros subject to revised processing rules for FM translators as part of the Local Community Radio Act of 2010. It is believed that this Form 349 application is not affected by those revised processing guidelines.

Baker herein proposes to modify the existing license of K224AP by changing the frequency to second adjacent channel 226D (93.1 MHz) and relocating to an existing tower associated with ASR #1040841, which is located in Fort Smith, AR. The proposed K224AP will operate with 250 watts ERP at 165 meters height above average terrain. The modified K224AP will be used as a fill-in translator for KFPW-FM Channel 233C3 (94.5 MHz), Facility ID # 26911, licensed to Barling, AR. Baker has obtained permission to retransmit KFPW-FM from Pharis Broadcasting, Inc., the licensee of KFPW-FM. Exhibit 10 is a map depicting that the proposed K224AP 60 dBu contour is contained inside the licensed KFPW-FM FCC F(50,50) 60 dBu contour.

Exhibits 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. This study is provided as a convenience to help identify stations that could potentially receive interference from the proposed K224AP modification. The channel study indicates four stations with which the proposed K224AP modification could potentially create interference.

KISR(FM) Channel 229C, Fort Smith, AR is located 19.67 km from the proposed K224AP site. The KISR (FM) FCC F(50,50) protected contour at the proposed K224AP was calculated to be 92.63 dBu. The proposed K224AP FCC F(50,10) interfering contour with respect to KISR(FM) is 132.64 dBu. Using the FCC's FM & TV Propagation and Curves Calculations program, the 132.64 dBu interfering contour extends from the antenna 26 meters. Since the center of radiation of the antenna is 143 meters above ground, the K224AP interfering contour with respect to KISR(FM) does not reach the ground.

Exhibit 13-B shows there is no interfering contour overlap with KWLB Channel 226C3, Red Oak, OK and KDYN-FM Channel 224C3, Coal Hill, AR. Though it is not shown on Exhibit 13-B, there is also no interference caused to KIGL Channel 227C1, Seligman, MO.

Exhibit 13-C demonstrates compliance with Section 74.1233(a) by demonstrating there is common overlap of FCC F(50,50) 60 dBu contours between the K224AP licensed and proposed facilities.

No interference will be created with or received from any existing translator station or low power FM (LPFM) facility.

A study has been undertaken to show the proposed K224AP facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A, 17-B and 17-C.