

EXHIBIT 12  
TECHNICAL STATEMENT  
MILWAUKEE, WISCONSIN 289D  
KEVIN J. YOUNGERS  
FCC FORM 349  
NOVEMBER 2013

This Technical Statement is in support of an amendment to a minor change application, BNPFT-20130815ACR, FCC form 349, being filed on behalf of Kevin J. Youngers in regards to a new FM translator for Milwaukee, Wisconsin, facility ID 157544.

Kevin J. Youngers is proposing to relocate to an existing tower site, ASR 1057482, at the coordinates N. 43°-05'46", W. 87°-54'15", NAD 27 on channel 289D with an Effective Radiated Power of 10 Watts. The antenna will be mounted at 268 meters Above Ground Level, with a Center of Radiation at 459 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the fourth and sixth lines, App IDs #1551604 and #1570827, of the table of Figure 1, there are apparent short spacings, but these applications are the same facility as this proposal and will be replaced by this application. The only pertinent records for further study are:

- 1) WMIL-FM Waukesha, Wisconsin 291B License
- 2) WLVE Mukwonago, Wisconsin 287A License
- 3) WAPL Appleton, Wisconsin 289C0 License

The proposed site is located within the protected 54 dB contour of 2<sup>nd</sup> adjacent WMIL-FM Waukesha, Wisconsin on channel 291B and the protected 60 dB contour of 2<sup>nd</sup> adjacent WLVE Mukwonago, Wisconsin on channel 287A.

The transmitter, with an ERP of 12 kW, for WMIL-FM is located on the same tower at the proposed site for the new FM translator, with an ERP of 10 W. Therefore the interfering signal contours F(50-10) generated by the proposed facility will never be

greater, much less 40 dB greater, than the predicted F(50-50) field strength of WMIL-FM. Therefore, there is no area of interference to WMIL-FM, much less population in the area of interference.

The predicted F(50-50) field strength of WLVE at the proposed transmitter site is 61.1 dB and the predicted interfering signal contours F(50-10) generated by the proposed facility to WLVE is an additional 40 dB at 101.1 dB. The maximum distance to the 101.1 dB interference contour is 195.1 meters from the transmitter. Because the transmitter is on the tower 268 meters above ground, the interference zone does not reach within 72 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 any area of predicted interference to WMIL-FM or WLVE.

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 WAPL Appleton, Wisconsin on channel 289C0. 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.

It was concluded that the proposed operation of a new translator in Milwaukee, Wisconsin on 289D 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.