

EXHIBIT 12  
TECHNICAL STATEMENT  
NEW EPHRATA, WASHINGTON 238D  
BUSTOS MEDIA HOLDINGS, LLC  
FCC FORM 349  
DECEMBER 2017

This Technical Statement is in support of a long form application, FCC form 349, being filed on behalf of Bustos Media Holdings, LLC in regards to a new translator for Ephrata, Washington on channel 238D with new facility ID #201546.

Bustos Media Holdings, LLC is proposing to use an existing site, ASR 1042917, at the coordinates N. 47°-18q18+, W. 119°-35q53+, NAD 27 and rebroadcasting KULE(AM) Ephrata, Washington, facility ID #4041. The proposed operation will use a Nicom BKG77 nondirectional antenna with an Effective Radiated Power of 250 Watts. The antenna will be mounted at 717 meters Above Ground Level, with a Center of Radiation at 25 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the first line of the table of Figure 1, there is an apparent conflict to a record for call letter 1763453, but this facility is the tech box that will be replaced by this application. The only pertinent records for further study are:

- 1) KZML Quincy, Washington 240C2 License

The proposed site is located within the protected contour of 2<sup>nd</sup> adjacent station KZML Quincy, Washington on channel 240C2. At the proposed transmitter site, the predicted F(50-50) field strength of KZML is 76.8 dB . The worst-case predicted interfering contour F(50-10) generated by the proposed facility to KZML at an additional 40 dB above the 76.8 dB received from KZML is a signal strength of 116.8 dB . Figure 2 shows that there is 0 population within the 116.8 dB interfering contour F(50-10) generated by the proposed facility. The applicant, Bustos Media Holdings, LLC, Inc., 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 3 shows the 60 dB contours of the proposed facility and the current tech box seeking to be modified by this application. They coincide as the parameters are the same.

The proposed operation of new translator will operate as a fill-in for KULE(AM) Ephrata, Washington, facility ID #4041. Figure 4 shows that the 60 dB contour F(50,50) of the new translator is fully within 25 miles of the KULE(AM) transmitter.

It was concluded that the proposed operation of new translator in Ephrata, Washington on 238D 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.