

EXHIBIT 12

**Modify W228CX CP BPFT-20151214AET
CH228D - 93.5 MHz .250 kW
Indianapolis, IN**

**Proposed W228CX - CH 228D – 93.5 MHz – 0.002 KW
Indianapolis, IN**

January 20, 2017

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Emmis Radio License, LLC (“Emmis”), licensee of FM translator W228CX, Facility ID number 150595, Channel 228D, Indianapolis, Indiana.

Emmis herein proposes to modify construction permit BPFT-20151214AET for FM translator W228CX. The W228CX transmitter site continues to be proposed on the existing tower 303.3 meters in overall height associated with ASR# 1030144. The proposed antenna center of radiation height above ground level will remain at 280 meters. The effective radiated power will be decreased to 2 watts directional. W228CX will continue to be used as a fill-in translator for WFNI(AM), 1070 kHz, Facility ID number 195521, licensed to Indianapolis, IN. Emmis is the licensee of WFNI(AM).

Exhibit 10 demonstrates compliance with FCC Section 74.1201(g). The proposed W228CX FCC F(50,50) 60 dBu contour is contained inside both the primary station WFNI(AM) 2.0 mV/m daytime contour and a 25 mile radius from the WFNI(AM) transmitter site. Exhibit 13-A is a channel study using Section 73.207 spacings for Class A FM stations. This study is provided as a convenience to help identify stations

that could potentially receive interference from the proposed W228CX modification. Exhibit 13-B shows the proposed W228CX modification will not create prohibited interference with WIBC, Channel 226B, Indianapolis, IN under Section 74.1204. Exhibit 13-C demonstrates Section 74.1204 contour protection to WRWM, Channel 230B1, Lawrence, IN. Exhibit 13-D shows compliance with Section 74.1233(a)(1) "Common Overlap". The FCC F(50,50) 60 dBu contours of the licensed and proposed W228CX facilities overlap. The proposed W228CX facility will not create interference with any full power FM, FM translator or LPFM stations.

A study has been undertaken to show the proposed W228CX facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.