

## **EXHIBIT 12 - TECHNICAL NARRATIVE**

This Technical Statement and attached exhibits were prepared on behalf of Southwest FM Broadcasting Co., Inc. ("Southwest"), licensee of FM translator K269EE, Channel 269D, Facility ID No. 61511, Prescott, Arizona.

The application proposes a modification of the K269EE construction permit BPFT-20140515AAZ. This application proposes only one change to the current construction permit. The two bay full wave antenna has been changed from a PSI FML-2A to a Bext TFC1K. The proposed K269EE facility would operate with 250 watts ERP at 1935 meters AMSL and 197 meters height above average terrain (HAAT). The modified K269EE will continue to be used as a fill-in translator for KAHM, Channel 271C, Facility ID No. 61510, licensed to Prescott, AZ<sup>1</sup>. Since Southwest is the licensee of both K269EE and KAHM, written permission to retransmit KAHM is not required.

Exhibit 10 shows compliance with Section 74.1201(g) Fill-In Translator. The proposed K269EE FCC F(50,50) 60 dBu contour is contained inside the primary station KAHM FCC F(50,50) 60 dBu contour.

Exhibit 13-A is a channel study using Section 73.207 spacing distances for Class A FM stations.

<sup>1</sup> Because the Commission license which the applicant holds to operate Station KAHM specifies Prescott, AZ, as its community of license, throughout this application (including the response to Section III-A, Question 2) the station is referred to as a Prescott station. However, the licensee holds a construction permit to modify the station's facilities and to change its community of license to Spring Valley, AZ (see BPH-20100813BHN, granted January 18, 2013, affirmed by letter of the Media Bureau dated April 29, 2014). Although the new facilities have not been constructed, and no license application has been submitted to the Commission, the Commission's database refers to the station as a Spring Valley station. Exhibit 10 of this application includes a showing that the proposed FCC F(50,50) contour of the translator is contained inside the KAHM FCC F(50,50) 60 dBu contour as approved in BPH-20100813BHN.

This study is provided as a convenience to help identify stations that could potentially receive interference from the proposed K269EE modification.

Exhibit 13-B demonstrates compliance with Section 74.1204 contour protection to second adjacent station KAHM Channel 271C, Prescott, AZ.

Exhibit 13-C shows compliance with Section 74.1204 contour protection with second adjacent station KNRJ, Channel 266C, Cordes Lakes, AZ.

Because no change in the K269EE transmit location is being proposed, no exhibit showing compliance with Section 74.1233(a), Common Overlap, is provided.

A study has been undertaken to show the proposed K269EE facility is in compliance with the Commission's radio frequency emission limits and environmental policies and is attached as Exhibits 17-A and 17-B.