

EXHIBIT 12
TECHNICAL STATEMENT
MILWAUKEE, WISCONSIN 286D
KEVIN J. YOUNGERS
FCC FORM 349
AUGUST 2013

This Technical Statement is in support of a minor change application, FCC form 349, being filed on behalf of Kevin J. Youngers in regards to a new FM translator from the Auction 83 Filing Window, application BNPFT-20030317LFO for Milwaukee, Wisconsin, facility ID 157544.

Kevin J. Youngers is proposing to relocate to an existing tower site, ASR 1248165, at the coordinates N. 43°-10q56+, W. 87°-54q23+, NAD 27 on channel 286D with an Effective Radiated Power of 2 Watts. The antenna will be mounted at 53 meters Above Ground Level, with a Center of Radiation at 256 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the first and third lines, App IDs #1551604 and #1569037, 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) WLVE Mukwonago, Wisconsin 287A License
- 2) App ID #1550775 Milwaukee, Wisconsin 284D (BNPFT-20130313BOR)
- 3) App ID #1550619 Port Washington, Wisconsin 286D (BNPFT-20130314AZR)
- 4) WTKM-FM Hartford, Wisconsin 285A License

Figure 2 is a predicted coverage map showing the 54 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of WLVE Mukwonago, Wisconsin on channel 287A. As can be seen, there is no prohibited overlap between these two contours.

App ID #1550775, file number BNPFT-20030313BOR, a tech box proposal, was superseded by App ID #1569524, file number BNPFT-20130819AAS, a long form application. This application appears in line 7 of the table of Figure 1. Figure 7 shows the 100 dB interference contours F(50,10) and the 60 dB service contours F(50,50) of App ID #1569524, file number BNPFT-20130819AAS, and the proposed facility. The 40 dB interference contours F(50,10) of each facility does not overlap the 60 dB service contour F(50,50) of the alternate facility.

Regardless, the proposed facility is compatible with the superseded App ID #1550775, file number BNPFT-20130313BOR for Milwaukee, Wisconsin on channel 284D, 2nd adjacent, and creates no new conflict. Figure 3 shows the 100 dB interference contours F(50,10) and the 60 dB service contours F(50,50) of App ID #1550775 and the proposed facility. The 100 dB interference contour F(50,10) of App ID #1550775 does not overlap the 60 dB service contour F(50,50) of the proposed facility. However, the 100 dB interference contour F(50,10) of this proposed facility does overlap the 60 dB service contour F(50,50) of App ID #1550775. In fact, the proposed site is located within the service contour of App ID #1550775.

The predicted F(50-50) field strength of App ID #1550775 at the proposed transmitter site is 66.5 dB and the maximum distance to the interfering contour F(50,10), 106.5 dB, is 46.8 meters. Because the transmitter is located 53 meters above ground level, the interference contour does not reach the ground and covers no population. Further, doing a coverage analysis, regardless of the power level from App ID #1550775, the 100 dB interference contours F(50,10) of the proposed operation covers no population. Therefore, 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 the area of predicted interference.

Figure 4 shows the 40 dB interference contours F(50,10) and the 60 dB service

contours F(50,50) of co-channel App ID #1550619, file number BNPFT-20130314AZR, and the proposed facility. The 40 dB interference contours F(50,10) of each facility does not overlap the 60 dB service contour F(50,50) of the alternate facility. The interference contour of application BNPFT-20130314AZR F(50,10) and the 60 dB service contours F(50,50) of the proposed facility appear to be very close to overlapping. Figure 1 states the overlap as 0.0 kilometers. However, even if there is an actual slight overlap, it is over Lake Michigan.

Figure 5 is a predicted coverage maps showing the 54 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of WTKM-FM Hartford, Wisconsin on channel 285A. As can be seen, there is no prohibited overlap between these two contours.

Figure 6 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 286D will not cause any harmful interference to any existing stations, will not create any new conflicts with pending Auction 83 applications, 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.