

EXHIBIT 12

Board of Regents of the Nevada System of Higher Education

Application to make changes in FM Translator K218AO, Hawthorne, NV

Waiver Request of Section 74.1204, and Showing of Compliance

The proposed FM translator is located within the protected 60 dBu F(50,50) contour of third adjacent channel FM Translator K221AR, Channel 221, Hawthorne, NV (see Overlap Study, Figure 1).

The predicted F(50,50) field strength of Translator K221AR at the proposed translator site is 83.3 dBu (free space equation). Using the Undesired to Desired method for calculating proposed interference, the interfering contour of the proposed translator with respect to K221AR is 123.3 dBu (83.3 + 40) (free space contour method employed). This interfering signal would, in the worst case at the maximum radial, extend 15.2 meters from the transmitting antenna.

An interference area representing the 123.3 dBu interfering contour has been plotted on a section of the 7.5 min **USGS Corey Peak, NV (USGS)** Topographical map (see Figure 2). In addition, the interference contour has been plotted on a recent aerial photo to illustrate the absence of any newer development in the area (see Figure 3). This is a remote mountaintop communications site. All structures in the area house communications equipment only, and have no regular human occupancy.

Since no population inhabits the interference area, the Applicant respectfully requests a waiver of the FM translator contour overlap requirements with respect to third adjacent FM translator K221AR, Hawthorne, NV.

Overlap Study

| K218AO Minor Modification | | | | | | | | | | | |
|--|------|---------|-------|-------|-------------------|-------------|---------|---------|----------------------------|-----------------|--------|
| Board Of Regents Of The Nevada System Of Higher Education | | | | | | | | | | | |
| CH# 218D - 91.5 MHz, Pwr= 0.01 kw DA, HAAT= 977.6 M, COR= 3134 M | | | | | | | | | | | |
| Average Protected F(50-50)= 16.8 km | | | | | | | | | | | |
| Standard Directional | | | | | | | | | | | |
| REFERENCE | CALL | TYPE | ANT | AZI. | DIST | LAT. | Pwr(kw) | INT(km) | PRO(km) | *IN* | *OUT* |
| 38 27 25.4 N. | | | STATE | <-- | FILE # | LNG. | HAAT(M) | COR(M) | LICENSEE | (Overlap in km) | |
| 118 45 48.9 W. | | | | | | | | | | | |
| 218D K218AO | | LIC DCN | | 33.7 | 0.43 | 38 27 37.0 | 0.047 | 15.7 | 1.9 | -32.9* | -71.8* |
| Hawthorne | | NV | | 213.7 | BLFT19861215TE | 118 45 39.0 | 988 | 3140 | Board Of Regents Of The Ne | | |
| TRANSLATOR FOR KUNR, RENO, NV. | | | | | | | | | | | |
| 217C KNIS | | LIC CN | | 317.7 | 121.03 | 39 15 30.0 | 67.000 | 137.6 | 91.7 | -23.1* | 27.0 |
| Carson City | | NV | | 137.1 | BLED19891016KA | 119 42 36.0 | 660 | 2311 | Western Inspirational Broa | | |
| 221D K221AR | | LIC DHN | | 33.7 | 0.43 | 38 27 37.0 | 0.050 | 0.1 | 5.8 | -17.3* | -5.6* |
| Hawthorne | | NV | | 213.7 | BLFT19980630TH | 118 45 39.0 | 937 | 3127 | Mineral Television Distric | | |
| Translator for KWNZ, Carson | | | | | | | | | | | |
| City, NV. | | | | | | | | | | | |
| 220A KELC | | LIC CX | | 58.9 | 14.42 | 38 31 26.6 | 0.100 | 0.7 | 5.6 | -6.2* | 8.6 |
| Hawthorne | | NV | | 238.9 | BLED20120907AEH | 118 37 18.0 | -267 | 1331 | American Educational Broad | | |
| 06 D K06KQ-D | | LI D N | | 86.0 | 147.99 | 38 32 16.0 | 0.020 | 0.1 | 34.3 | 131.5R | 16.5M |
| Manhattan | | NV | | 267.1 | BLDTV20110531AQP | 117 03 57.0 | 378 | 2235 | County Of Nye | | |
| 06 D 1330491 | | AP N | | 324.8 | 153.89 | 39 35 03.0 | 0.300 | 0.1 | 34.3 | 131.5R | 22.4M |
| Reno | | NV | | 144.2 | BNPDVL20090825AOE | 119 47 52.0 | 367 | 1725 | Alma Corporation | | |
| 215B KWTM | | LIC CX | | 221.3 | 54.60 | 38 05 14.0 | 0.910 | 1.6 | 18.7 | 47.8 | 31.2 |
| June Lake | | CA | | 41.0 | BLED20020411AAO | 119 10 31.0 | 105 | 2580 | Living Proof Inc | | |
| 220D K220BC | | LIC DHN | | 325.0 | 72.16 | 38 59 15.0 | 0.045 | 0.3 | 15.2 | 64.1 | 56.5 |
| Yerington, Etc. | | NV | | 144.7 | BLFT19861215TG | 119 14 35.0 | 456 | 1945 | Board Of Regents Of The Ne | | |
| TRANSLATOR FOR KUNR, RENO, NV. | | | | | | | | | | | |

| CH CITY | CALL | TYPE | ANT STATE | AZI. <-- | DIST FILE # | LAT. LNG. | Pwr(kw) HAAT(M) | INT(km) COR(M) | PRO(km) LICENSEE | *IN* (Overlap | *OUT* in km) |
|--------------------------|---------|------|-----------|-------------|---------------------------|------------------------|-----------------|----------------|---------------------------------|---------------|--------------|
| 219C3 Tonopah | KTPH | LIC | C NV | 108.1 289.0 | 141.67 BLED20080521ABU | 38 03 07.0 117 13 30.0 | 1.000 430 | 65.4 2166 | 42.4 Nevada Public Radio | 61.0 | 76.1 |
| 06NT Yerington | K06KC | LI | DHN NV | 325.0 144.7 | 72.16 BLTTV19800930IE | 38 59 15.0 119 14 35.0 | 0.027 614 | 0.1 1948 | 3.9 Lyon County Public Works | 4.0R | 68.2M |
| 06-T Gabbs | K06NZ | LI | D NV | 58.6 239.1 | 88.18 BLTTV20040204ACX | 38 52 02.0 117 53 39.0 | 0.057 341 | 2.8 1722 | 12.6 City Of Gabbs | 15.4R | 72.8M |
| 217B Big Pine | KDOX | LIC | EX CA | 156.2 336.6 | 126.80 BLED20121015ACZ | 37 24 42.0 118 11 07.0 | 0.500 926 | 43.8 3315 | 26.1 Western Inspirational Broa | 81.1 | 83.7 |
| 219C2 Jessup | NEW | CP | CX NV | 355.3 175.2 | 162.07 BNPED20071018ABI | 39 54 35.0 118 55 15.0 | 5.000 260 | 66.5 1643 | 43.4 Centro Cristiano Vida Abun | 82.0 | 101.4 |
| 06 D Ceres | 1330972 | AP | D CA | 240.5 59.2 | 213.89 BNPDL20090825BYV | 37 29 26.8 120 52 26.8 | 0.300 79 | 2.8 95 | 12.6 One Ministries, Inc. | 131.5R | 82.4M |
| 219B Groveland | KXSR | LIC | DCX CA | 251.7 70.8 | 136.62 BMLD20121119AOT | 38 03 46.0 120 14 45.0 | 4.000 485 | 41.8 1543 | 27.3 California State Universit | 89.9 | 94.8 |
| 06NT Dayton | K06JK | LI | DHN NV | 323.2 142.8 | 103.14 BLTTV19780822IC | 39 11 52.0 119 28 50.0 | 0.047 1130 | 0.1 2548 | 5.1 Lyon County Public Works | 5.2R | 98.0M |
| 221D Yosemite Village, E | K221DK | LIC | ?H CA | 221.4 40.9 | 107.49 BLFT19910515TA | 37 43 45.0 119 34 20.0 | 0.023 -72 | 0.3 2190 | 3.9 Yosemite Concession Servic | 102.0 | 103.4 |
| 221C3 Sparks | KWFP | LIC | NCX NV | 324.7 144.1 | 154.08 BLH20041102ABT | 39 35 03.0 119 48 06.0 | 8.900 153 | 4.7 1713 | 49.2 Wilks License Company-reno | 141.3 | 103.2 |
| 218B Fresno | KSJV | LIC | CN CA | 184.5 4.4 | 202.91 BLED19800806AB | 36 38 15.0 118 56 35.0 | 16.000 265 | 90.3 1608 | 20.4 Radio Bilingue, Inc. | 108.7 | 143.8 |
| 215D Carson City | K215FJ | LIC | DV NV | 317.9 137.3 | 120.88 BLFT20121218ABA | 39 15 34.0 119 42 21.0 | 0.010 | 0.1 2275 | 8.8 Educational Media Foundati | 114.1 | 109.3 |
| 219D Bishop | K217EE | APP | C CA | 160.9 341.2 | 129.53 BPFT20121017AAD | 37 21 18.0 118 17 04.0 | 0.010 | 10.8 1620 | 8.9 Family worship Center Chur | 112.5 | 118.3 |
| 217D Bishop | K217EE | LIC | H CA | 160.9 341.2 | 129.53 BLFT20010125ACG | 37 21 18.0 118 17 04.0 | 0.010 -204 | 10.8 1620 | 8.9 Family worship Center Chur | 112.5 | 118.3 |
| 220D South Lake Tahoe, E | K220CO | LIC | DVN CA | 295.0 114.2 | 121.31 BLFT19891113TD | 38 54 40.0 120 02 05.0 | 0.156 21 | 0.2 2225 | 3.4 Western Inspirational Broa | 117.4 | 113.5 |
| 215D Bishop, Etc. | K215BQ | LIC | DHN CA | 160.9 341.2 | 129.53 BLFT19970811TA | 37 21 18.0 118 17 04.0 | 0.020 -321 | 0.3 1618 | 10.0 Board Of Regents Of The Ne | 122.7 | 117.4 |
| 06 D Sacramento | KEFM-LD | CP | D CA | 288.4 106.5 | 277.42 BDCCDVL20110708ABD | 39 12 20.0 121 49 10.0 | 3.000 668 | 2.8 694 | 12.6 Venture Technologies Group | 131.5R | 145.9M |
| 06ZT Sacramento | KEFM-LP | LI | D CA | 288.4 106.5 | 277.42 BLTVL20120410AEA | 39 12 21.1 121 49 09.7 | 3.000 661 | 2.8 687 | 12.6 Venture Technologies Group | 131.5R | 145.9M |
| 06-T San Jose | KBKF-LP | AP | N CA | 249.6 67.7 | 292.40 BPTVL20101014ACL | 37 29 56.0 121 52 16.0 | 3.000 819 | 2.8 831 | 12.6 Venture Technologies Group | 131.5R | 160.9M |
| 06 D Ely | K06HT-D | LI | D NV | 73.8 256.2 | 346.87 BLDTV20111216ABM | 39 15 53.0 114 53 35.0 | 0.053 505 | 0.1 2396 | 34.3 White Pine Television Dist | 131.5R | 215.4M |
| 06 D Elko | K06MK-D | LI | D NV | 44.0 225.9 | 371.20 BLDTV20111123AAA | 40 49 16.0 115 42 04.0 | 0.100 428 | 0.1 2001 | 34.3 Elko Television District | 131.5R | 239.7M |
| 06 D Healdsburg | 1331038 | AP | D CA | 277.3 94.7 | 374.19 BNPDL20090825CBK | 38 48 34.0 123 02 56.0 | 0.300 368 | 2.8 457 | 12.6 One Ministries, Inc. | 131.5R | 242.7M |
| 06 D Ryndon | K06NY-D | LI | D NV | 43.0 225.0 | 387.70 BLDTV20111219ABC | 40 57 54.0 115 36 47.0 | 0.062 24 | 2.8 1586 | 12.6 Elko Television District | 131.5R | 256.2M |
| 06 D Panaca | K06DM-D | LI | D NV | 105.1 287.7 | 392.68 BLDTV20130123ADQ | 37 27 34.0 114 27 57.0 | 0.060 892 | 2.8 2284 | 12.6 Lincoln County Tv District | 131.5R | 261.2M |
| 06 D Redding | KNNN-LD | CPM | D CA | 308.4 126.0 | 404.14 BMPDL20110826ABQ | 40 39 14.0 122 31 15.0 | 3.000 810 | 0.1 1015 | 3.9 Venture Technologies Group | 131.5R | 272.6M |

| CH CITY | CALL | TYPE | ANT STATE | AZI. <-- | DIST FILE # | LAT. LNG. | Pwr(kw) HAAT(M) | INT(km) COR(M) | PRO(km) LICENSEE | *IN* (Overlap | *OUT* in km) |
|-------------------------|---------|------|--------------|---------------|-----------------------------|---------------------------|--------------------|-------------------|------------------------|------------------|-----------------|
| 06 D Santa Maria | 1329572 | AP | D N CA | 198.3 17.4 | 414.23 BNPDVL20090825BOX | 34 54 36.0 120 11 10.0 | 0.300 677 | 2.8 897 | 12.6 James L. Primm | 131.5R | 282.7M |
| 06 D San Luis Obispo | 1433847 | AP | N CA | 198.3 17.4 | 414.23 BNPDVL20090825BTH | 34 54 36.0 120 11 10.0 | 0.020 -180 | 0.1 40 | 3.9 Termer | 131.5R | 282.7M |

Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM. In & Out distances between contours are shown at closest points. Reference Zone= West Zone, Co to 3rd adjacent. All separation margins (if shown) include rounding
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.

Figure 1

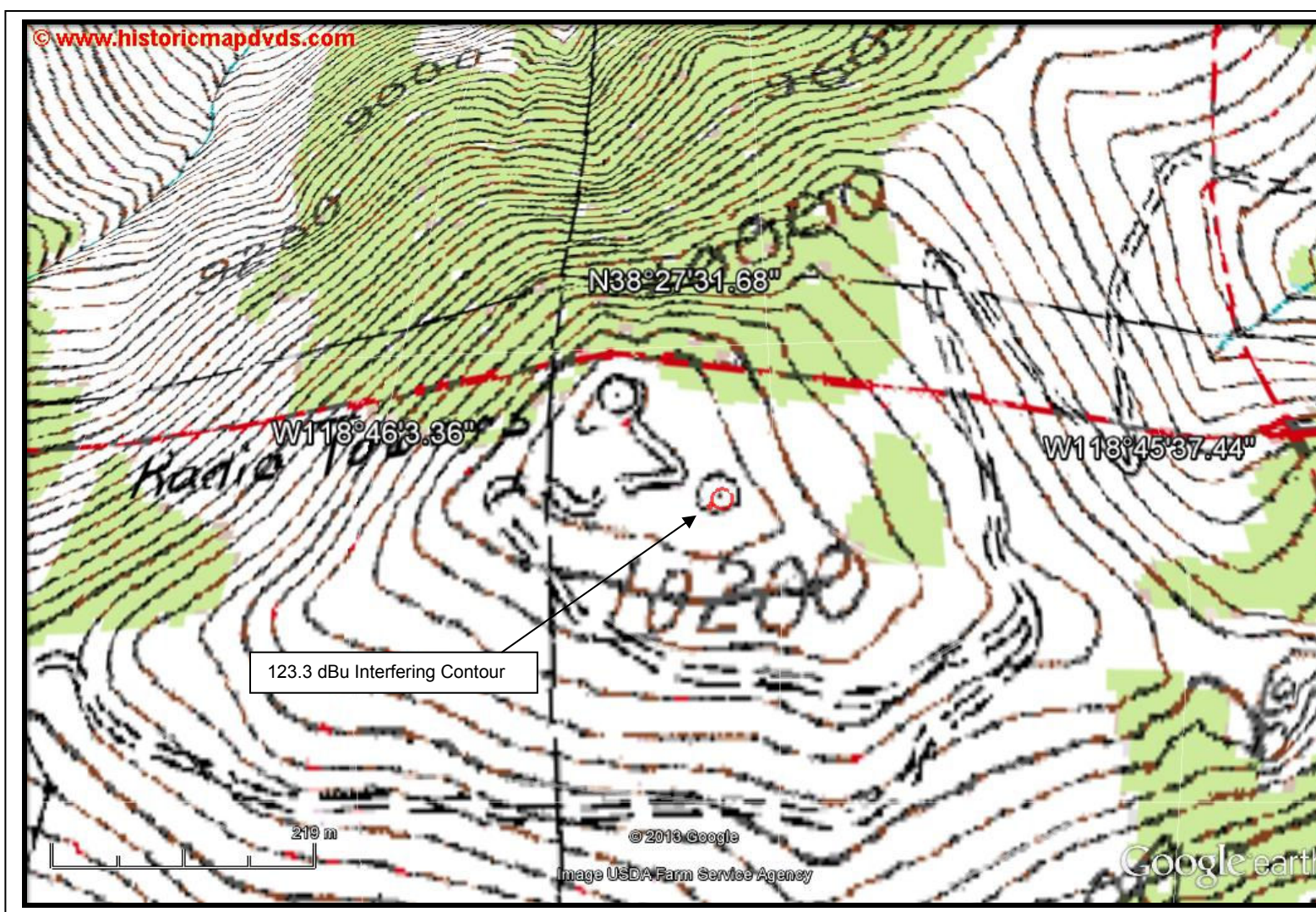


Figure 2



Figure 3