

## **EXHIBIT 12 – NARRATIVE**

This application is submitted on behalf of Claro Communications and GAB, LLC to move GAB, LLC translator K268CR from San Antonio, Texas to Boerne, Texas. This move is authorized per FCC Public Notice DA 1491, released December 23, 2015. The Public Notice is authorizing two FM translator modification windows to allow Class C and D AM stations to move a single FM translator for the purpose to provide fill-in service. This application is being submitted in the first filing Window, which begins 29 Jan 2016.

### **Translator to be moved:**

K268CR  
Facility ID 148337  
BLFT – 20140324AAH  
Ch 268  
Licensee – GAB, LLC – Gerald Benavides.

### **Station to be re-broadcast:**

KBRN  
1500 Khz  
Facility ID – 51961  
Boerne, Texas  
Licensee – Claro Communications

### **Proposed Location:**

NAD(27):  
29 – 48 – 44 N  
98 – 43 – 41 W

Translator will be co-located with KBRN, a class D daytime station. The distance from where this translator is currently located to the place of co-location with KBRN is 128 miles.

This application will also change the translator's frequency to channel 280, 103.9 MHz. The 60 dbu contour of the translator is completely inside of the 2mV/m contour of KBRN as shown in the attached exhibit 12 – AM Fill-in compliance.

### **Mexico**

The proposed site of this translator is 205 km from the US / Mexico border. This application is in compliance with the terms and requirements of the US / Mexico Treaty.

### **Third Adjacent Channel Interference Wavier**

This proposed site is inside the 60 dbu contour of KZEP ch 283, San Antonio, Texas. KZEP F(50,50) signal strength is 65 dbu at the proposed translator site. The translator interfering F(50,10) contour is 105 dbu. An exhibit is provided of the 105 dbu contour showing that this contour does not enter into any habital dwelling or cross any roadway. Applicant is requesting a wavier of the third adjacent channel interference protection requirement as there are no persons inside this contour and thus no interference.

## EXHIBIT 12 – NARRATIVE

No new interference is created by this application to any other licensed facility, CP, or application.

Tech Box Item:

[6] – Antenna Location Site Elevation AMSL – 445 meters

[7] – Overall Tower Height AGL – 43 meters

[8] – Height of Radiation Center AGL – 30 meters (H) and (V)

[9] – Effective Radiated Power – 0.250 kW (H) and (V)

[10] – Directional antenna Scala CA5 – FM/CP/RM. Antenna Pattern attached and shows the pattern rotated 200 degrees.

**Exhibit 12:** Narrative, Channel Study, Overlap Requirements, RFE, and aerial photo.

**Exhibit 13:** Overlap Requirements

**Exhibit 17:** Environment – RFE: This facility complies with the requirements 47 CFR 1.1306.

Power density can be calculated using the following formula:

$$S = \frac{33.4 (F^2) ERP}{R^2}$$

where: S = power density in  $\mu\text{W}/\text{cm}^2$

F = relative field factor (relative numeric gain)

ERP = power in watts

R = distance in meters

F = 0.35 relative field

ERP = 500 watts

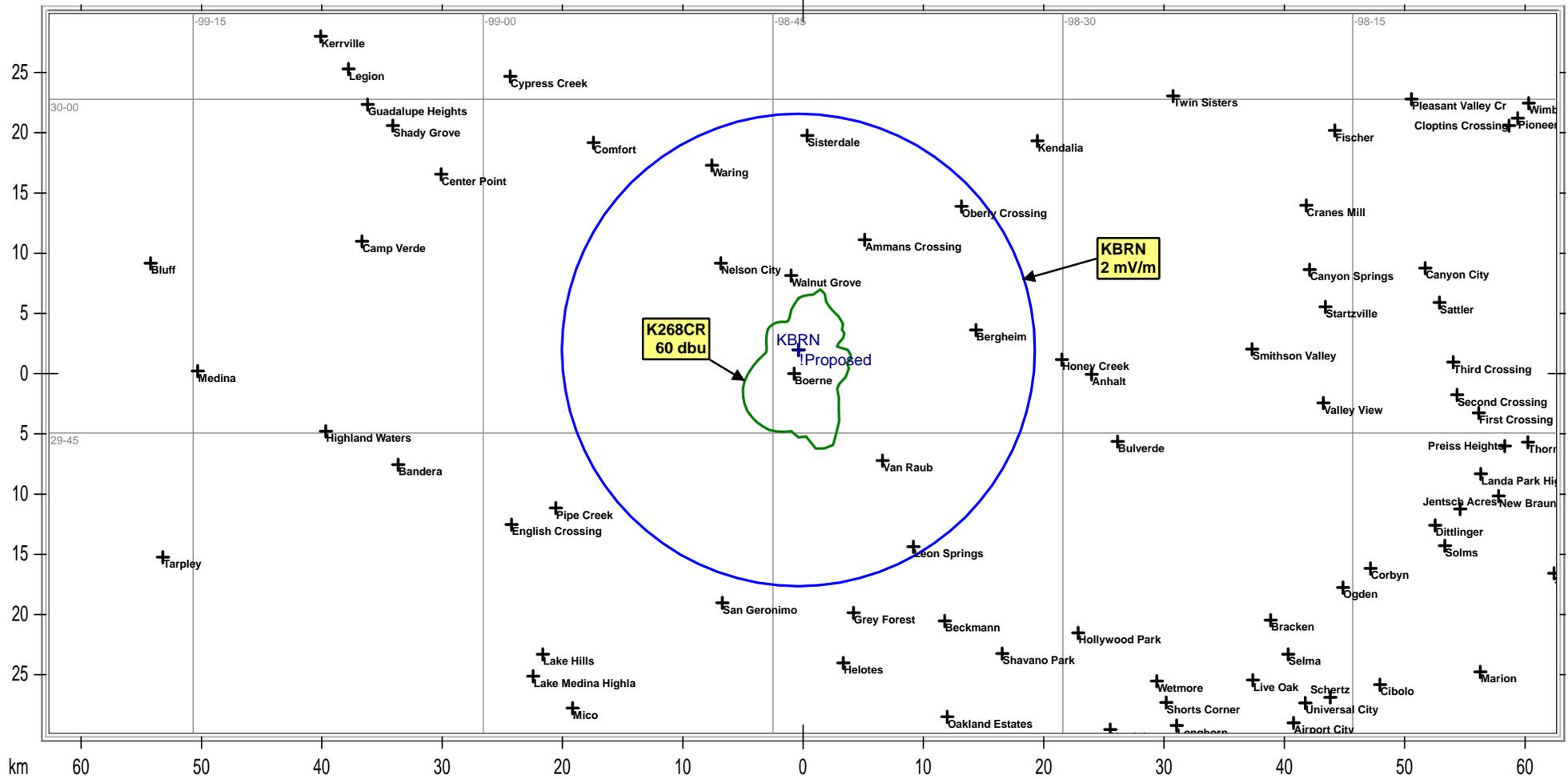
R = 28 meters

For this proposal, the calculated power density is:

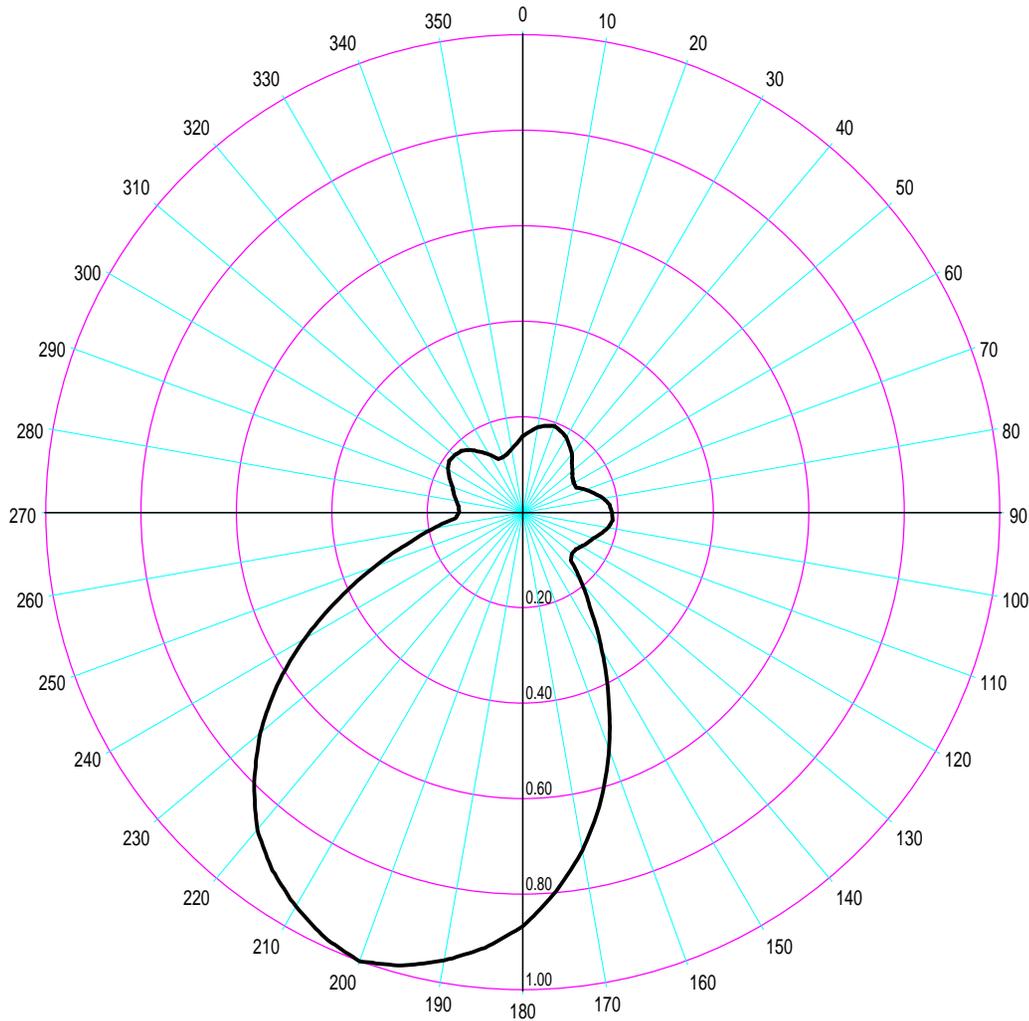
$S = 2.6 \mu\text{W}/\text{cm}^2$ , or 1.3% of uncontrolled public access limit of  $200 \mu\text{W}/\text{cm}^2$ . This is less than 5% of the total allowable uncontrolled public access exposure of  $200 \mu\text{W}/\text{cm}^2$ , therefore no further study is required. When workers are present on the tower, applicant will reduce power or cease transmission.

**EXHIBIT 12  
CONTOUR OVERLAP 74.1204  
K268CR**

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
<b>KZEP-FM</b>	<b>TX</b>	<b>SAN ANTONIO</b>	<b>104.5</b>	<b>283</b>	<b>100000</b>	<b>C1</b>	<b>LIC</b>	<b>49.67</b>	<b>0</b>	<b>-5.42 dB</b>
KBPA	TX	SAN MARCOS	103.5	278	100000	C0	LIC	85.8	0	4.32 dB
KBPA	TX	SAN MARCOS	103.5	278	100000	C0	LIC	85.8	0	6.06 dB
KSAH-FM1	TX	PEARSALL	104.1	281	20000	D	LIC	99.56	0	6.90 dB
KZEP-FM	TX	SAN ANTONIO	104.5	283	50000	C1	LIC	46.38	0	8.88 dB
K279AB	TX	SAN ANTONIO	103.7	279	220	D	CP MOD	49.67	0	11.21 dB
K282BI	TX	KERRVILLE	104.3	282	250	D	LIC	42.47	0	13.32 dB
KSAH-FM	TX	PEARSALL	104.1	281	100000	C1	LIC	120.98	0	15.79 dB
K279AB	TX	SAN ANTONIO	103.7	279	81	D	LIC	36.96	0	16.10 dB
KAXA	TX	MOUNTAIN HOME	103.7	279	6000	A	LIC	75.05	0	18.85 dB
K280GC	TX	NEW BRAUNFELS	103.9	280	250	D	CP	49.21	0	20.43 dB
K277CX	TX	TERRELL WELLS	103.3	277	185	D	LIC	49.67	0	23.44 dB
KMSN	TX	MASON	104.1	281	50000	C2	CP	121.35	0	24.88 dB
K279CK	TX	HONDO	103.7	279	125	D	CP	62.73	0	24.63 dB
NEW	TX	WIMBERLEY	103.9	280	100	LP100	APP	65.28	24	25.30 dB
KBEY	TX	BURNET	103.9	280	2400	A	CP	107.79	0	26.92 dB
KBEY	TX	BURNET	103.9	280	1800	A	LIC	110.21	0	27.98 dB
KBEY	TX	BURNET	103.9	280	700	A	LIC	110.3	0	29.48 dB
KBEY	TX	BURNET	103.9	280	400	A	CP	98.01	0	30.06 dB
KBEY	TX	BURNET	103.9	280	700	A	CP	98.01	0	30.56 dB
KSAG	TX	PEARSALL	103.3	277	6000	A	LIC	97.4	0	31.78 dB
	CI	CIUDAD ACUNA	103.9	280	100000	C		220.16	0	31.88 dB
KLQB	TX	TAYLOR	104.3	282	48000	C2	LIC	148.39	0	32.59 dB
NEW	TX	SMILEY	103.9	280	25000	C3	APP	141.09	0	32.65 dB
KLQB	TX	TAYLOR	104.3	282	35000	C2	LIC	148.39	0	34.84 dB
KBEY	TX	BURNET	103.9	280	0	A	USE	110.3	0	34.60 dB
NEW	TX	PEARSALL	103.3	277	6000	A	CP	110.25	0	35.36 dB
KSAH-FM	TX	PEARSALL	104.1	281	0	C1	USE	118.45	0	36.78 dB
KZEP-FM	TX	SAN ANTONIO	104.5	283	0	C1	USE	49.52	0	37.74 dB
KXAI	TX	REFUGIO	103.7	279	100000	C1	LIC	233.77	0	39.41 dB



State Borders      Lat/Lon Grid



Azim	Rel.FS	ERP [W]	dBk
0.0	0.160	6.428	-21.919
5.0	0.170	7.257	-21.393
10.0	0.182	8.317	-20.800
15.0	0.188	8.875	-20.518
20.0	0.193	9.353	-20.290
25.0	0.188	8.875	-20.518
30.0	0.182	8.317	-20.800
35.0	0.170	7.257	-21.393
40.0	0.160	6.428	-21.919
45.0	0.145	5.279	-22.774
50.0	0.135	4.576	-23.395
55.0	0.127	4.050	-23.926
60.0	0.123	3.799	-24.204
65.0	0.123	3.799	-24.204
70.0	0.140	4.921	-23.079
75.0	0.155	6.033	-22.195
80.0	0.171	7.342	-21.342
85.0	0.183	8.409	-20.753
90.0	0.187	8.781	-20.565
95.0	0.189	8.969	-20.472
100.0	0.181	8.226	-20.848
105.0	0.170	7.257	-21.393
110.0	0.157	6.189	-22.084
115.0	0.150	5.650	-22.480
120.0	0.142	5.063	-22.956
125.0	0.135	4.576	-23.395
130.0	0.134	4.509	-23.460
135.0	0.142	5.063	-22.956
140.0	0.190	9.065	-20.427
145.0	0.247	15.319	-18.148
150.0	0.329	27.179	-15.658
155.0	0.423	44.928	-13.475
160.0	0.528	70.001	-11.549
165.0	0.628	99.028	-10.042
170.0	0.718	129.445	-8.879
175.0	0.796	159.098	-7.983
180.0	0.866	188.310	-7.251

Azim	Rel.FS	ERP [W]	dBk
185.0	0.915	210.223	-6.773
190.0	0.952	227.568	-6.429
195.0	0.982	242.136	-6.159
200.0	1.000	251.095	-6.002
205.0	0.982	242.136	-6.159
210.0	0.952	227.568	-6.429
215.0	0.915	210.223	-6.773
220.0	0.866	188.310	-7.251
225.0	0.796	159.098	-7.983
230.0	0.718	129.445	-8.879
235.0	0.628	99.028	-10.042
240.0	0.528	70.001	-11.549
245.0	0.423	44.928	-13.475
250.0	0.329	27.179	-15.658
255.0	0.247	15.319	-18.148
260.0	0.190	9.065	-20.427
265.0	0.142	5.063	-22.956
270.0	0.134	4.509	-23.460
275.0	0.135	4.576	-23.395
280.0	0.142	5.063	-22.956
285.0	0.150	5.650	-22.480
290.0	0.157	6.189	-22.084
295.0	0.170	7.257	-21.393
300.0	0.181	8.226	-20.848
305.0	0.189	8.969	-20.472
310.0	0.187	8.781	-20.565
315.0	0.183	8.409	-20.753
320.0	0.171	7.342	-21.342
325.0	0.155	6.033	-22.195
330.0	0.140	4.921	-23.079
335.0	0.123	3.799	-24.204
340.0	0.123	3.799	-24.204
345.0	0.127	4.050	-23.926
350.0	0.135	4.576	-23.395
355.0	0.145	5.279	-22.774

# EXHIBIT 12 - KBRN / K268CR

F(50, 10) 105 dbu contour  
No population in contour

Legend

