

## **EXHIBIT 12 – Overlap Requirements & Waiver Request**

*Let it be noted that as a “Fill-in” translator for KUNR (see Figure 4), the MERP power restrictions of 74.1235(b) do not apply.*

### **Waiver Request of Section 74.1204 and Showing of Compliance**

The proposed modification of FM Translator K219AR seeks to adjust the antenna system, increase power, reduce the Center-of-Radiation, and install a new transmitting antenna at the same coordinates.

The proposed FM translator is located within the protected 60 dBu F(50,50) protected contour of 2<sup>nd</sup> adjacent channel stations KNIS, Carson City, NV., Channel 217, facility ID # 71818, and KWFP, Sparks, NV., Channel 221, facility ID # 69279 (see **Figure 1**).

#### **With regard to KNIS, Carson City, NV**

The predicted F(50,50) field strength of KNIS at the proposed translator site is 80.4 dBu (free space equation). Using the Undesired-Desired method for calculating proposed interference, the proposed interfering contour with respect to KNIS is 120.4 dBu ( $80.4 + 40$ )(free space equation). This interfering contour would extend 92.7 meters from the transmitting antenna. Figure 2 below is a portion of the 7.5 min VERDI, NV Topographical map with an overlay defining an interference area having a radius of 440 meters (see Figure 2 and discussion below regarding KWFP). This interference area is located on a remote mountaintop, with no population in the area, and the only structures being those housing communications equipment and having no regular human occupancy.

#### **With regard to KWFP, Sparks, NV**

The predicted F(50,50) field strength of KWFP at the proposed translator site is 66.9 dBu (free space equation). Using the Undesired-Desired method for calculating proposed interference, the proposed interfering contour with respect to KWFP is 106.9 dBu ( $66.9 + 40$ )(free space equation). This interfering contour would extend 439 meters from the transmitting antenna. Figure 2 below is a portion of the 7.5 min VERDI, NV Topographical with an overlay defining an interference area having a radius of 440 meters. This interference area is located on a remote mountaintop, with no population in the area, and the only structures being those housing communications equipment and having no regular human occupancy.

To further support this waiver request, an interference area represented by a circle with a 440 meter radius has been plotted on an aerial photograph of the proposed site (see Figure 3). As

is obvious from the photo, there are no buildings, or major highways within the interference area.

Since no population inhabits the interference area, the Applicant respectfully requests a waiver of the FM translator contour overlap regulations with respect to second-adjacent channel stations KNIS and KWFP.

K219AR MINOR MODIFICATON											
Board Of Regents Of The Nevada System Of Higher Educat											
CH# 219D - 91.7 MHz, Pwr= 0.19 kw, HAAT= 691.6 M, COR= 2432 M											
Average Protected F(50-50)= 32.5 km											
Omni-directional											
DISPLAY DATES											
DATA 03-16-15											
SEARCH 03-16-15											
CH	CALL	TYPE	ANT	AZI.	DIST	LAT.	Pwr(kw)	INT(km)	PRO(km)	*IN*	*OUT*
CITY		STATE		<--	FILE #	LNG.	HAAT(M)	COR(M)	LICENSEE	(Overlap	in km)
219D	K219AR!	LIC DV		0.0	0.00	39 34 38.0	0.046	12.8	1.8	-45.8	-95.8
Verdi		NV		0.0	BLFT20140311ADQ	119 56 19.0	690	2430	Board Of Regents Of The Ne		
217C	KNIS	LIC CX		150.8	40.52	39 15 31.2	67.000	12.2	88.2	-8.8	-48.6*
Carson City		NV		331.0	BMLE20141015ACK	119 42 33.4	660	2311	Western Inspirational Broa		
221C3	KWFP	LIC NCX		86.2	11.76	39 35 03.0	8.900	1.8	17.6	-25.3*	-6.8*
Sparks		NV		266.3	BLH20041102ABT	119 48 06.0	153	1713	Wilks License Company-reno		
06 D	1330491	CP	N	86.3	12.09	39 35 03.0	0.300	3.6	6.6	10.2R	1.9M
Reno		NV		266.4	BNPDVL20090825AOE	119 47 52.0	367	1725	Alma Corporation		
220D	K220CO	CP	C	186.4	74.60	38 54 37.2	0.149	31.3	21.0	9.3	7.0
South Lake Tahoe, E		CA		6.3	BPFT20130408AAA	120 02 05.5	28	2233	Western Inspirational Broa		
220D	K220CO	LIC DVN		186.4	74.51	38 54 40.0	0.156	30.0	20.7	10.7	10.6
South Lake Tahoe, E		CA		6.3	BLFT19891113TD	120 02 05.0	21	2225	Western Inspirational Broa		
219B	KXSR	LIC DCX		189.1	170.46	38 03 46.0	4.000	120.2	46.8	15.2	22.7
Groveland		CA		8.9	BMLE20121119AOT	120 14 45.0	485	1543	California State Universit		
220D	K220BC	LIC DHN		137.4	88.77	38 59 15.0	0.045	4.6	2.8	45.6	25.2
Yerington, Etc.		NV		317.8	BLFT19861215TG	119 14 35.0	456	1945	Board Of Regents Of The Ne		
220D	K220DB	LIC DC		339.9	103.01	40 26 47.4	0.060	40.0	25.7	29.2	26.1
Susanville, Etc.		CA		159.6	BLFT20140311ADO	120 21 26.0	673	2049	Board Of Regents Of The Ne		
219B	KCHO	LIC CN		286.2	157.46	39 57 30.0	7.700	105.4	38.6	29.9	44.1
Chico		CA		105.0	BLED19860514KD	121 42 48.0	372	1119	The Research Foundation		
273D	K273AF	LIC DC		150.4	40.57	39 15 34.0	0.160	56.7	37.6	9.5R	31.1M
Carson City		NV		330.6	BLFT20110801AGL	119 42 21.0	630	2301	The Evans Broadcast Compan		
220A	DKJPT.	CP	DVX	247.6	95.39	39 14 47.0	0.480	25.7	11.4	47.7	34.9
Colfax		CA		67.0	BNPED20071022AIX	120 57 48.0	347	1206	Immaculate Conception Apos		
06ZT	KEFM-LP	LI	D N	256.3	166.78	39 12 21.1	3.000	1.9	32.8	131.5R	35.3M
Sacramento		CA		75.1	BLTVL20120410AEA	121 49 09.7	661	687	Venture Technologies Group		
06 D	KEFM-LD	CP	D N	256.3	166.80	39 12 20.0	3.000	1.9	32.8	131.5R	35.3M
Sacramento		CA		75.1	BDCCDVL20110708ABD	121 49 10.0	668	694	Venture Technologies Group		
217D	KNIS-FM1	CP	DC	186.4	74.60	38 54 37.2	4.200	3.0	36.7	37.6	35.4
South Lake Tahoe		CA		6.3	BNPFTB20130813ABQ	120 02 05.5		2233	Western Inspirational Broa		
220A	KQNY	LIC DCX		295.2	95.03	39 56 15.0	2.700	15.1	9.7	50.6	39.1
Quincy		CA		114.6	BLED20100727ACJ	120 56 49.0	-342	1057	Plumas Community Radio		
218D	K218EU	LIC	C	259.2	108.29	39 23 18.0	0.010	18.1	11.4	64.5	56.4
North San Juan		CA		78.4	BLFT20140313AAN	121 10 36.0	441	1075	Calvary Chapel Of Twin Fal		
218A	KFBR	LIC	CX	22.3	129.31	40 39 06.7	0.600	12.5	8.9	80.0	64.7
Gerlach		NV		202.7	BLED20110121AAO	119 21 24.7		1217	Friends of Black Rock High		
222C3	KSVL	LIC	CX	146.5	118.61	38 41 06.0	0.490	1.6	46.0	79.2	71.6
Smith		NV		327.0	BLH20120326AEQ	119 11 04.0	624	2508	Donegal Enterprises		

CH CITY	CALL	TYPE	ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
273C Silver Springs	1496477	APP	NV	94.1 274.9	108.53 BSFH20120112AHE	39 30 00.0 118 40 48.0	100.000 600	56.7 1802	37.6 Northway Broadcasting	28.5R	80.0M
273C Silver Springs	AU9368098	VAC	NV	94.1 274.9	108.53 RM11167	39 30 00.0 118 40 48.0	100.000 600	56.7 1802	37.6 Dana J. Puopolo	28.5R	80.0M
273C Silver Springs	1504299	APP	CX NV	94.1 274.9	108.53 BNP20120530AOI	39 30 00.0 118 40 48.0	100.000 452	56.7 1653	37.6 Northway Broadcasting	28.5R	80.0M
221A Placerville	KMJE-FM	LIC	NCX CA	210.2 29.7	120.73 BLH20060714AAW	38 38 10.5 120 38 14.0	6.000 100	1.6 963	15.8 Lotus Sacramento Corp.	82.8	99.0
216A Oroville	KROV	LIC	DCX CA	266.5 85.7	117.82 BLED20130424ACP	39 30 18.0 121 18 35.0	0.225 378	0.6 991	9.9 Bird Street Media Project	91.8	103.1
220A Hawthorne	KELC	LIC	CX NV	135.4 316.3	163.21 BLED20120907AEH	38 31 26.6 118 37 18.0	0.100 -267	13.6 1331	8.1 American Educational Broad	111.4	94.9
06 D Ceres	K06QL-D	CP	D N CA	199.6 19.0	245.82 BNP20090825BYV	37 29 26.8 120 52 26.8	0.300 79	1.9 95	32.8 One Ministries, Inc.	131.5R	114.3M
06+T Redding	KNNN-LP	LI	D N CA	299.4 117.8	250.02 BLTVL20060918ACG	40 39 15.0 122 31 13.0	1.500 797	3.6 1001	6.6 Venture Technologies Group	131.5R	118.5M
06 D Redding	KNNN-LD	CPM	D N CA	299.4 117.8	250.04 BMP20110826ABQ	40 39 14.0 122 31 15.0	3.000 810	3.6 1015	6.6 Venture Technologies Group	131.5R	118.5M
06 D Manhattan	K06KQ-D	LI	D N NV	114.1 295.9	273.59 BLDTV20110531AQP	38 32 16.0 117 03 57.0	0.020 378	3.6 2235	6.6 County of Nye	131.5R	142.1M
06NT Lewiston	K06EX	LI	DHN CA	297.6 115.8	275.32 BLTTV1166	40 41 27.0 122 49 55.0	0.007 386	1.9 986	32.8 Lewiston Translator Compan	131.5R	143.8M
06 D Healdsburg	K06QM-D	CP	D N CA	253.3 71.4	281.24 BNP20090825CBK	38 48 34.0 123 02 56.0	0.300 368	3.6 457	6.6 One Ministries, Inc.	131.5R	149.7M
06NT Hopland	K06FA	LI	DHN CA	256.3 74.3	281.86 BLTTV4184	38 56 06.0 123 06 22.0	0.013 335	1.9 512	32.8 Sanel Valley Television As	131.5R	150.4M
06-T San Jose	KBKF-LP	AP	N CA	216.6 35.4	285.70 BPTVL20101014ACL	37 29 56.0 121 52 16.0	3.000 819	1.9 831	32.8 Venture Technologies Group	131.5R	154.2M
06 T San Jose	KBKF-LP	CP	D N CA	211.8 30.6	320.57 BDFCDVL20140213AAR	37 06 39.1 121 50 37.0	2.000 1007	1.9 1184	32.8 Venture Technologies Group	131.5R	189.1M
06 T Fort Jones, Etc.	K06KA	CP	D N CA	310.8 128.9	327.61 BDFCDTV20111026AEG	41 28 00.0 122 54 50.0	0.021 283	1.9 1131	32.8 Ktv1 Licensee, Llc	131.5R	196.1M
06 D Chiloquin	K06NS-D	LI	N OR	333.5 152.3	335.30 BLDTV20090126ABJ	42 15 45.0 121 45 22.0	0.193 406	1.9 1669	32.8 California Oregon Broadcas	131.5R	203.8M
06 D Elko	K06MK-D	LI	D N NV	67.6 250.4	385.45 BLDTV20111123AAA	40 49 16.0 115 42 04.0	0.100 428	3.6 2001	6.6 Elko Television District	131.5R	254.0M
06 D Ryndon	K06NY-D	LI	D Y NV	65.8 248.6	397.99 BLDTV20111219ABC	40 57 54.0 115 36 47.0	0.062 24	1.9 1586	32.8 Elko Television District	131.5R	266.5M

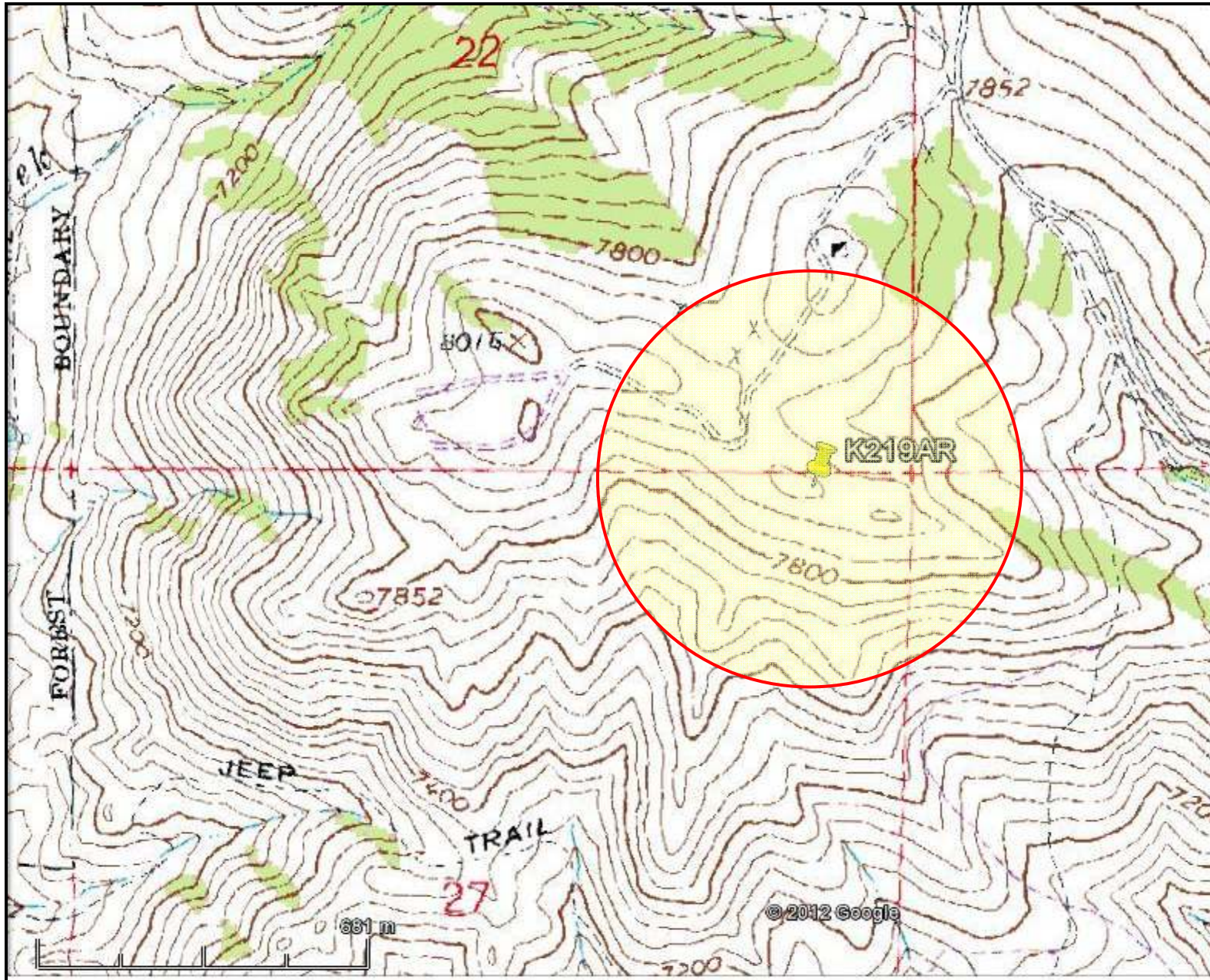
Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM. In & Out distances between contours are shown at closest points. Reference Zone= West Zone, Co to 3rd adjacent. All separation margins (if shown) include rounding. Call signs with exclamation marks need not be protected. 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 restricted contour.  
« = Station meets FCC minimum distance spacing for its class.

Facility being modified

2nd adjacent waiver requested, see discussion

Figure 1





VERDI, NV Quadrangle

1:24,000

K219AR Coordinates: 39 34 38 N, 119 56 19 W (NAD 27)

Figure 2





**Figure 3**

**Qualification as a “Fill-in” FM Translator for Primary station KUNR(FM)**

The 60 dBu F(50,50) contour of the proposed FM Translator lies completely within the 60 dBu F(50,50) contour of the primary station (KUNR(FM), see **Figure 4**.

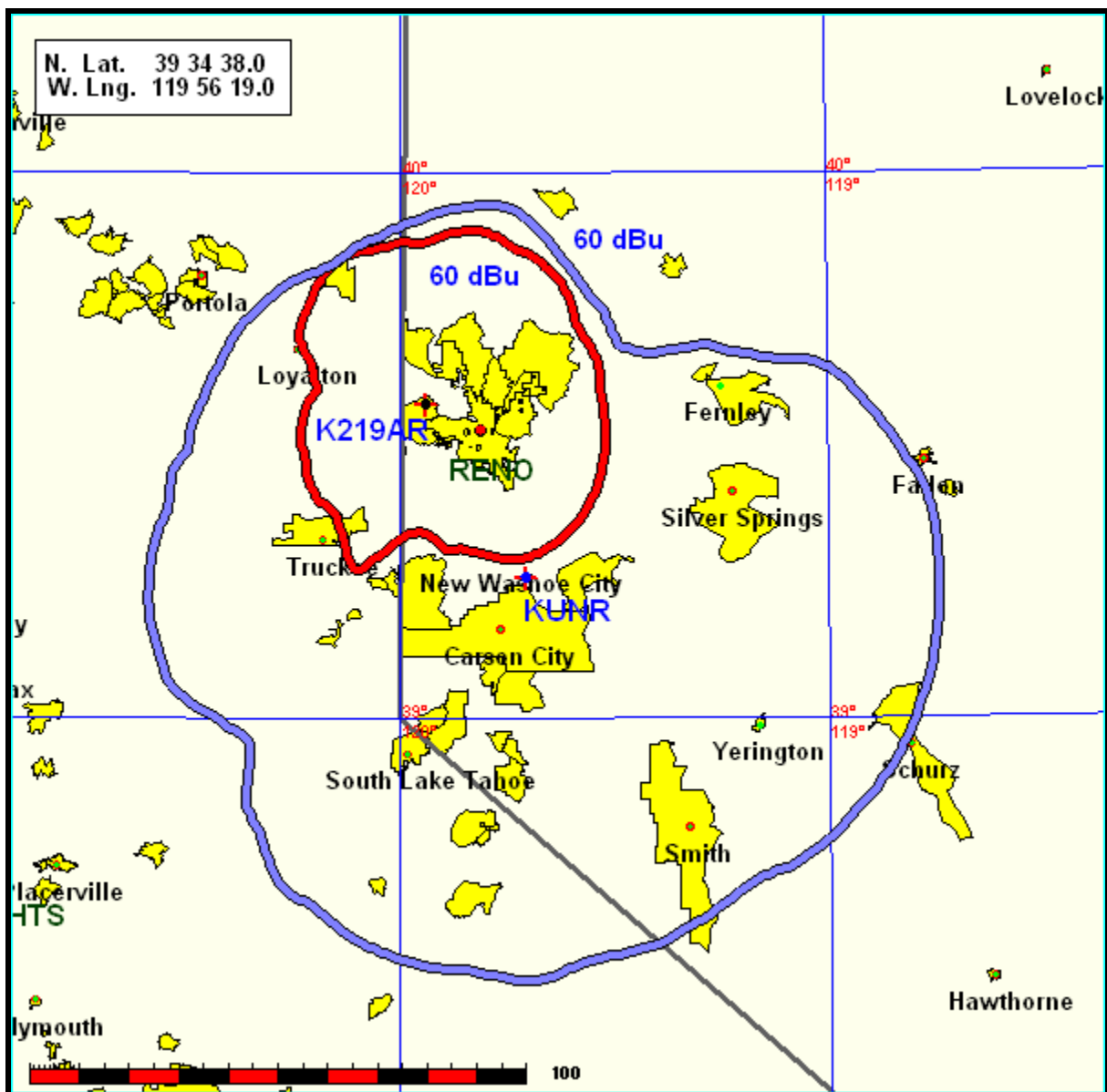


Figure 4