EXHIBIT 12
TECHNICAL STATEMENT
W229CG CLEVELAND, OHIO 283D
RADIO.COM, LLC
FCC FORM 349
JANUARY 2015

This Technical Statement is in support of a minor change application, FCC form 349, being filed on behalf of RADIO.COM, LLC in regards to W229CG Cleveland, Ohio, facility ID 157726. RADIO.COM, LLC is proposing to change channels from channel 229D to the IF channel on 283D. Nothing else will change.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the third line of the table of Figure 1, there is an apparent short spacing, but this is the same facility as this proposal and will be replaced by this application. The only pertinent records for further study are:

1) WQKT Wooster, Ohio 283B License

2) WQAL Cleveland, Ohio 281A License

3) WCLV Lorain, Ohio 285A License

Figure 2 is a predicted coverage map showing the 34 dBε interference contour F(50,10) of the proposed operation and the 54 dBε protected contour F(50,50) of WQKT Wooster, Ohio on channel 283B. As can be seen, there is no prohibited overlap between these two contours.

The proposed site is located within the protected contours of 3rd adjacent station WQAL Cleveland, Ohio on channel 281B. The predicted F(50-50) field strength of WQAL at the proposed transmitter site is 79.7 dBε. Therefore, the predicted interfering signal contour F(50-10) generated by the proposed facility to WZAK is an additional 40 dBε at 119.7 dBε. The maximum distance to the 119.7 dBε interference contour is 31.6 meters. Figure 3 shows an aerial view of the building site with the 119.7 dBε interfering contour

plotted in red for an ERP of 19 Watts. Note that the interference zone only covers the 2-story building at the building site.

Figure 4 is a table for an ERP of 19 Watts showing the vertical clearance of the interfering contour based on the antenna relative field for various depression angles below horizontal for the antenna. The minimum vertical clearance is 7.9 meters, just greater than 25.9 feet, and will not reach anyone within the building. Therefore, the 3rd adjacent interference zone does not reach any population and the applicant, RADIO.COM, LLC, 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 5 is a predicted coverage map showing the 100 dBε interference contour F(50,10) of the proposed operation and the 60 dBε protected contour F(50,50) of WCLV Lorain, Ohio on channel 285A. As can be seen, there is no prohibited overlap between these two contours.

Figure 6 shows the FCC predicted 60 dBε contours of the proposed facility. It is the same as the present W229CG since only the channel has changed from 229D to 283D.

This proposal meets Section 4 of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement between the Government of Canada and the Government of the United States of America relating to the FM Broadcasting Service. The ERP at 19 Watts does not exceed 50 Watts. Figure 6 shows that the proposed 34 dBε interference contour F(50,10) does not come near the common border of Canada and the United States.

It was concluded that the proposed operation of W229CG in Cleveland, Ohio on 283D will not cause any harmful interference to any existing stations 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.