

## **EXHIBIT 12 – Waiver Request of Section 74.1204 and Showing of Compliance; Waiver Request of Section 74.1235(b)(2).**

### **Section 74.1204 Discussion**

The proposed FM translator is located within the protected 60 dBu F(50,50) contours of 2<sup>nd</sup> adjacent channel station KDNV(CP), Channel 216, FID #161775, Winnemucca, NV; 3<sup>rd</sup> adjacent channel FM translator K211FE, FID #92263, Winnemucca, NV; and 3<sup>rd</sup> adjacent channel FM translator K217AX, FID # 69223, Winnemucca, NV (see Figure 1).

#### **KDNV(CP)**

The predicted F(50,50) field strength of the KDNV(CP) 60 dBu contour at the proposed translator site is 68.4 dBu (free space equation). Using the Undesired to Desired method for calculating proposed interference, the interfering contour of the proposed translator with respect to the KDNV(CP) is 108.4 dBu (68.4 + 40) (free space contour method employed). This interfering signal would, in the worst case at the maximum radial, extend 215.9 meters from the proposed FM translator antenna.

An interference area represented by a circle with a radius of 216 meters around the proposed translator site has been plotted on a section of the 7.5 min USGS Winnemucca Mt.(USGS) topographical map (see figure 2). The interference area is located on a mountaintop in a remote, unpopulated area. All structures in the area house communications equipment only, and have no regular human occupancy.

#### **FM Translator K211FE**

The predicted F(50,50) field strength of the FM translator K211FE 60 dBu contour at the proposed translator site is 94.3 dBu (free space equation). Using the Undesired to Desired method for calculating proposed interference, the interfering contour of the proposed translator with respect to K211FE is 134.3 (94.3 + 40) (free space contour method employed). This interfering signal would, in the worst case at the maximum radial, extend 10.8 meters from the proposed FM translator antenna.

This interference area lies within the above defined interference area (relative to the KDNV discussion) (see figure 2), and is uninhabited. Again, all structures in the area house communications equipment only, and have no regular human occupancy.

#### **FM Translator K217AX**

The predicted F(50,50) field strength of the FM translator K217AX 60 dBu contour at the proposed translator site is 74.9 dBu (free space equation). Using the Undesired to Desired method for calculating proposed interference, the interfering contour of the proposed translator with respect to K217AX is 114.9 dBu (74.9 + 40) (free space contour method employed). This interfering signal would, in the worst case at the maximum radial, extend 101.2 meters from the proposed FM translator antenna.

This interference area lies within the above defined interference area (relative to the KDNV discussion) (see figure 2), and is uninhabited. Here again, all structures in the area house communications equipment only, and have no regular human occupancy.

**EXHIBIT 12 – cont.**

Since no population inhabits the interference areas, the Applicant respectfully requests a waiver of the FM translator contour overlap requirements with respect to 2<sup>nd</sup> adjacent KDNV(CP), Winnemucca, NV and 3<sup>rd</sup> adjacent FM translators K211FE and K217AX, also licensed to Winnemucca, NV.

K213BG Minor Modification											
Western Inspirational Broadcasters, Inc.											
CH# 214D - 90.7 MHz, Pwr= 0.065 kw DA, HAAT= 564.0 M, COR= 1969 M DISPLAY DATES											
41 00 36.0 N. Average Protected F(50-50)= 22.5 km DATA 08-26-11											
117 45 53.0 W. Standard Directional SEARCH 08-26-11											
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)	
216C	KDNV	CP	CX	160.6	68.3	40 25 48.0	30.000	10.1	89.2	37.1	-21.3*
Winnemucca	NV			340.8	BMPED20081218AAW	117 29 47.0	1012	2730	Alabama Christian Radio, I		
211D	K211FE	LIC	V	248.7	0.4	41 00 31.0	0.010	0.2	15.2	-8.4*	-14.9*
Winnemucca	NV			68.7	BLFT20101118APJ	117 46 10.0	656	2059	Calvary Chapel Of Twin Fal		
213D	K213BG	LIC	DCN	0.0	0.0	41 00 36.0	0.065	8.8	5.4	-14.2*	-14.2*
Winnemucca	NV			0.0	BLFT19900116TI	117 45 53.0	564	1969	Western Inspirational Broa		
217D	K217AX	LIC	DCN	78.5	0.3	41 00 38.0	0.052	0.0	1.7	-8.0*	-1.5*
Winnemucca	NV			258.5	BLFT19861215TF	117 45 40.0	668	2076	Board Of Regents Of The Ne		
06NT	K06FQ	LI	D N	115.4	100.6	40 37 04.8	0.188	8.9	24.2	33.1R	67.6M
Cooper Canyon, Etc.	NV			296.1	BLTTV20101008ACY	116 41 21.0	796	2235	Lander County General Impr		
06NT	K06CT	LI	DHN	3.0	71.1	41 38 59.0	0.114	1.9	0.9	2.9R	68.3M
Orovada	NV			183.0	BLTTV19930719IF	117 43 14.0	555	1865	Quinn River Tv Maintenance		
211D	K211FG	LIC	DV	115.1	100.6	40 37 17.0	0.094	0.7	25.9	82.9	74.0
Battle Mountain	NV			295.8	BLFT201011108AAH	116 41 16.0	680	2270	Western Inspirational Broa		
214A	KNVQ	LIC	CX	96.6	175.4	40 48 42.0	0.500	83.1	29.1	75.9	92.1
Spring Creek	NV			277.9	BLED20101005ACF	115 41 58.0	287	1968	Western Inspirational Broa		
215C	KFBR	APP	DCX	246.1	237.8	40 07 01.2	75.000	147.1	101.6	81.2	121.5
Gerlach	NV			64.4	BPED20110225ACR	120 19 00.0	612	2216	Friends Of Black Rock High		
213C	KKTO	LIC	VN	224.3	261.1	39 18 38.0	38.000	145.3	99.5	101.6	148.3
Tahoe City	CA			42.9	BLED19970902KB	119 53 01.0	896	2977	California State Universit		

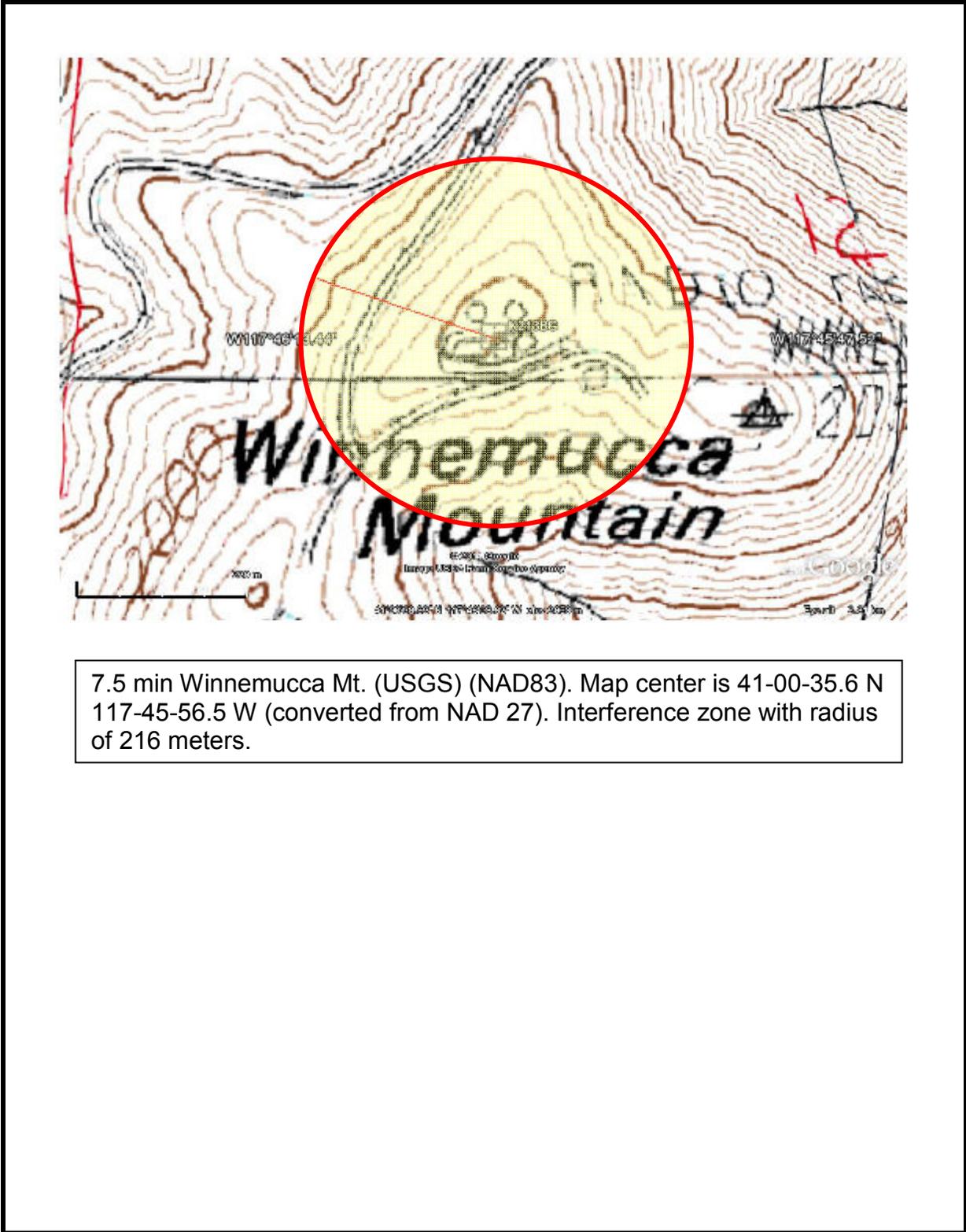
Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM. In & Out distances between contours are shown at closest points. Reference Zone= West Zone, Co to 3rd adjacent. Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization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

Facility being modified.

Contour overlap.

Figure 1

**EXHIBIT 12** – Cont.



7.5 min Winnemucca Mt. (USGS) (NAD83). Map center is 41-00-35.6 N 117-45-56.5 W (converted from NAD 27). Interference zone with radius of 216 meters.

Figure 2

**EXHIBIT 12** – Cont.

**Section 74.1235(b)(2) discussion**

With this application, the Applicant seeks waiver of the power limitations as set forth in CFR 74.1235(b)(2), and continued “**grandfathering**” to retain the currently authorized ERP (65 watts Vertical vs the 74.1235(b)(2) 10 watt limitation). There will be no change in the location, center of radiation, or antenna pattern of the proposed translator. This Application proposes a change of frequency only.