

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

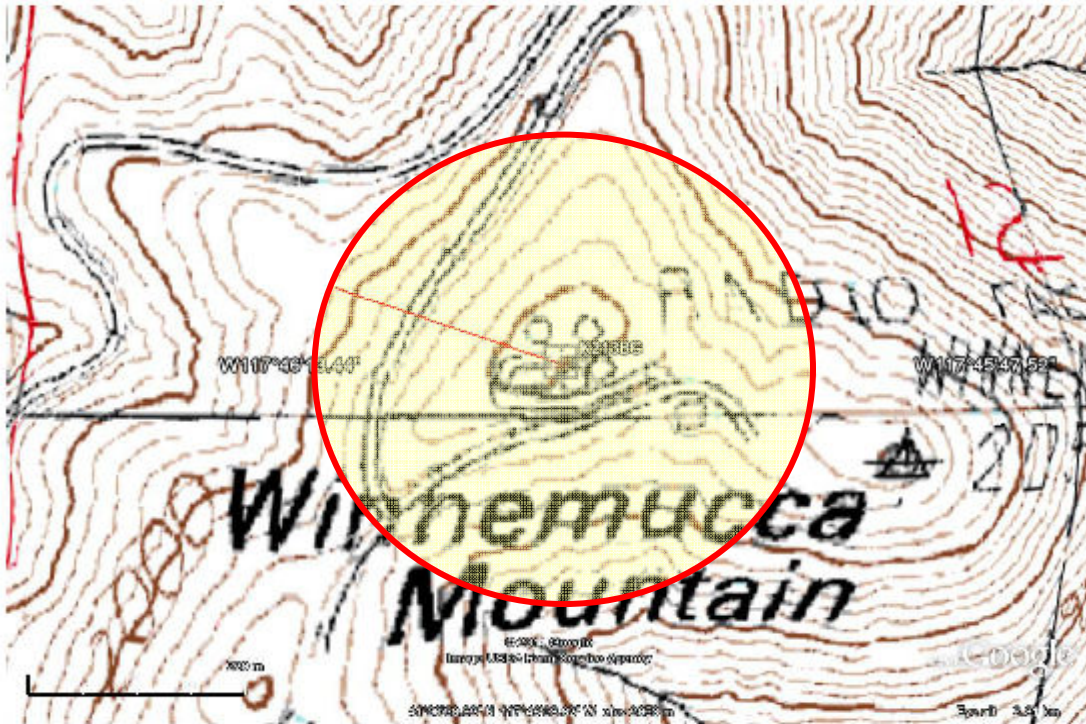
Terrain database is NGDC 30 SEC, R= 73.215 qualifying spacings or FCC minimum spacings in KM, M= Margin in KM  
In & Out distances between contours are shown at closest points. Reference Zone= West Zone, Co to 3rd adjacent.  
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (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.