

## **EXHIBIT 12**

Modify K295CH FM Translator Station  
Proposed CH 295D – 106.9 MHz – 0.250 KW  
Kansas City, MO  
March 19, 2014

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Alpine Broadcasting Corp., ("Alpine"), licensee of FM translator station K295CH, Channel 295D, Facility ID# 36259, Harrisonville, MO. Alpine herein proposes to amend the pending FCC Form 349 minor modification application BPFT-20140325ABS for FM translator K295CH. The application proposes changing to a new transmitter location and operate with a directional antenna. This amendment is being filed to change the transmit antenna orientation to vertical polarization. This change is necessary to demonstrate that the proposed K295CH facility is mutually exclusive with the licensed K295CH facility. A map showing mutual exclusivity is included in Exhibit 13-E Section 74.1233(a) Common Overlap - "Request for Mattoon Waiver". The community to which the proposed facility would be licensed to has been changed to Kansas City, MO. The proposed K295CH facility would operate with 250 watts vertical polarization at 284 meters height above ground and 281 meters HAAT. The modified K295CH will be used as a fill-in translator for KCTE, 1510 kHz, Facility ID No. 64637, licensed to Independence, MO. Alpine has obtained written permission to retransmit KCTE from Union Broadcasting, Inc., licensee of KCTE.

Exhibit 10 shows compliance with Section 74.1201(g) Fill-In Translator. The proposed K295CH FCC F(50,50) 60 dBu contour is contained inside the primary station KCTE(AM) 2.0 mV/M daytime contour and a 25 mile radius from the KCTE(AM) transmit location.

Exhibit 13-A is a channel study using Section 73.207 spacing distances for Class A FM stations. This study is provided as a convenience to help identify stations that could potentially receive interference from the proposed K295CH modification.

Exhibit 13-B demonstrates compliance with Section 74.1204 contour protection to co-channel stations KTPK Channel 295C, Topeka, KS.

Exhibit 13-C shows compliance with Section 74.1204 contour protection with second adjacent station WDAF-FM, Channel 293C1, Liberty, MO.

Exhibit 13-D shows compliance with Section 74.1204 contour protection with second-adjacent channel stations KMJK, Channel 297C1, North Kansas City, MO.

The proposed K295CH does not meet the criteria of Section 74.1233(a) - Common Overlap. Therefore Alpine respectfully requests a waiver of Section 74.1233(a) per a "Mattoon" waiver<sup>1</sup> because the proposed modification appears

to meet the criteria for such a waiver. First, the licensee does not have a history of filing serial minor modification applications. K295CH has operated from its current location since September 29, 2011. The three other FM translators licensed to Alpine have also not changed transmit locations since 2011. Second, the proposed K295CH facility is mutually exclusive with the existing K295CH facility. Third, the proposal would not preclude future LPFM opportunities. There are no licensed LPFM stations or applications for new LPFM stations on the co-channel, first, second, or third adjacent or I.F. channels within 100 km. of the proposed K295CH transmitter location. Fourth, the proposal would represent an efficient use of spectrum in the public interest because the proposed primary station for K295CH, KCTE is an AM station. Exhibit 13-E demonstrates mutual exclusivity in that the proposed K295CH FCC F(50,10) 40 dBu contour overlaps the licensed K295CH FCC F(50,50) 60 dBu contour.

A study has been undertaken to show the proposed K295CH facility is in compliance with the Commission's radio frequency emission limits and environmental policies and is attached as Exhibits 17-A and 17-B.