

## **Exhibit 12**

**Modify FM Translator K237GR  
CH 237D - 95.3 MHz – 0.095 kW, Johnson, AR  
to  
Proposed CH 237D – 95.3 MHz – 0.250 kW, Bentonville AR**

**June 8, 2017**

### **TECHNICAL NARRATIVE**

This Technical narrative and attached exhibits were prepared on behalf of Hog Radio, Inc. (“Hog”), licensee of FM translator station K237GR, Facility ID No. 154564, Channel 249D, Johnson, Arkansas. The proposed primary station is KUOA(AM), 1290 kHz, Facility ID No. 35729, Siloam Springs, Arkansas.

Hog herein proposes to modify the facilities of K237GR relocating to a different tower site at Bentonville, AR. The existing tower is 110 meters (360.8) in overall height and is associated with ASR #1038004. The proposed channel K237GR facility will operate with 250 watts ERP circular polarization with a directional antenna at 61 meters height above ground level and 61 meters height above average terrain. As modified, the station will continue to be used as a fill-in translator for KUOA(AM), Siloam Springs, Arkansas. Since Hog is the licensee of both KUOA(AM) and K237GR written permission to retransmit KUOA(AM) is not required.

Exhibit 10 demonstrates compliance with Section 74.1201(g) Fill-in Translator. The proposed K237GR FCC F(50,50) 60 dBu contour is contained inside the primary station KUOA(AM) 2.0 mV/M daytime contour. Exhibit 13-A is a channel study using Section 73.207 separation distances for Class A FM stations provided as a convenience to FCC staff. The channel study indicates short spacings to three full power FM stations and one FM translator based on Class A spacing.

Exhibit 13-B demonstrates Section 74.1204 contour protection to co-channel FM translator K237FT, Eureka Springs, AR. Exhibit 13-C demonstrates Section 74.1204 contour protection to co-channel full power FM station KERX, Channel 237C2, Paris, AR. Exhibit 13-D shows that the proposed K237GR Channel 237D facility will not cause prohibited contour overlap with second adjacent channel full power FM station KSEC, Channel 239A, Bentonville, AR. Exhibit 13-E demonstrates Section 74.1204 contour protection to first adjacent full power FM station KMXL Channel 236C2, Carthage, MO.

K237GR was modified with minor modification Form 349 application BPFT-20161021ABZ in the second AM Filing Window for all AM stations in 2016. Footnote 22 of FCC 17-14A1, MB Docket No. 13-249 which was released on February 24, 2017 provides additional flexibility for FM translators which participated in the 2016 AM filing window. Specifically it *states "As noted in paragraph 1, supra, we wish to provide those applicants who participated in the Commission-ordered 2016 translator modification windows with maximum flexibility in providing service to their authorized communities and nearby areas. Accordingly, such an applicant may apply to further move its cross-service FM translator already relocated pursuant to the 2016 modification windows, as a minor modification application, as long as the proposed further modification complies with both the amended 47 CFR § 74.1201(g) adopted here and with the 250-mile limitation imposed in the First Report and Order in this proceeding, see AMR FNPRM, 30 FCC Rcd at 12152, para. 15."* Exhibit 13-F shows continued compliance with the 250 mile distance requirement as allowed by Footnote 22 of FCC 17-14A1.

A study has been undertaken to show the proposed K237GR facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.