Exhibit 12
Technical Narrative

FM Translator K258CZ

K258CZ Licensed Facility Big Pine, Etc., California
Channel 258D (99.5 MHz) 0.001 kW ERP

K258 CP BPFT-20160729AAS Las Vegas, Nevada
Channel 244D(96.7 MHz) 0.250 kW ERP

K258CZ Proposed CP Mod Exeter, California
Channel 253D (98.5 MHz) 0.250 kW

Dale A. Ganske, is licensee of FM translator K258CZ, Channel 248D, Facility ID No. 71816, Big Pine, Etc., California and permittee of construction permit BPFT-20160729AAS for K258CZ, Channel 244D, Las Vegas, Nevada. Ganske is filing an FCC Form 349 to modify construction permit BPFT-20160729AAS by change the operating frequency of K258CZ to a non-adjacent frequency Channel 253D (98.5 MHz) and re-locate to Exeter, California. K258CZ was modified during the second window of the 2016 AM filing window for Class A and B AM stations. Therefore, K258CZ can be further modified to a non-adjacent channel as described in MB Docket No. 13-249, FCC 17-14 Footnote 22.

The proposed modification of K258CZ will specify operation on Channel 253D (98.5) at a non-registered tower near Exeter, California. The primary station for K258CZ will be Class B AM station KVMI, 1270 kHz, Facility ID No. 71716, Tulare, CA. Ganske has obtained written retransmission consent from Momentum Broadcasting, LP, licensee of KVMI. KVMI did not participate in the 2016 AM filing window for FM translators and thus is qualified to be the primary AM station for K258CZ. The proposed K258CZ transmitter location is 71.7 miles from the K258CZ licensed site, well within the required 250 mile radius. Currently KVMI is the primary station for FM translator K248BX, Channel 248D, Facility ID No. 147149, Visalia. Ganske requests a special operating condition requiring that there not be a substantial overlap of the FCC F(50,50) 60 dBu contours of K248BX and K258CZ. This will require either the modification of K258CZ or K248BX or K248BX changing its primary station.

The proposed K258CZ facility would operate on Channel 253D (98.5 MHz), with 250 watts ERP vertically polarized directional antenna at 17 meters above ground and 297 meters HAAT.

Exhibit 10 demonstrates compliance with FCC Section 74.1201(g) for use as a Fill-In Translator. The proposed K258CZ FCC F(50,50) 60 dBu contour is contained within the KVMI FCC 2.0 mV/M daytime contour. Therefore it is believed that this application is in compliance with Section 74.1201(g) of the Commission's rules.

Exhibits 13-A is a channel study using Section 73.207 spacings for Class A FM stations. This study is provided as a convenience for FCC staff.

Exhibit 13-B demonstrates Section 74.1204 contour protection to KDFO, Channel 255B1, Delano, CA. Exhibit 13-C demonstrates Section 74.1204 contour protection to KSOF, Channel 255B, Dinuba, CA. Exhibit 13-D demonstrates Section 74.1204 contour to KZLA, Channel 252B1, Riverdale, CA. Exhibit 13-E demonstrates Section 74.1204 contour protection to KNFS-LP, Channel 251L1, Tulare, CA. Exhibit 13-F demonstrates Section 74.1204 contour protection to KMGV, Channel 250B, Fresno, CA.

An Exhibit showing compliance with Section 74.1233(a) "Common Overlap" is not included. Exhibit 13-G demonstrates the K258CZ licensed and proposed facilities are located within 250 miles of each other.

No interference will be delivered or received from any existing translator station or low power FM (LPFM) facility.

A study has been undertaken to show the proposed K258CZ facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.