

**EXHIBIT NO. 12
ONE STEP CHANNEL CHANGE
AND INTERFERENCE PROTECTION
K257BU 99 WATTS 332.7 M HAAT CH. 255
HENDERSON, NEVADA**

The applicant, Lotus Broadcasting Corp., proposes to modify the licensed facilities of FM translator station K257BU, Henderson, Nevada, FCC ID No. 38447, pursuant to Section 74.1233 of the Commission's rules, for a different channel, power and antenna height than is authorized in FCC File No. BLFT-19830811MG. K57BU is a fill-in FM translator that operates in association with co-owned commercial FM broadcast station KXPT, Las Vegas, Nevada, FCC ID No. 38450.

Specifically, this proposal involves a "one-step" channel change to second adjacent Channel 255, the installation of a new directional antenna system, a radiation center height above average terrain (HAAT) of 332.7 meters and a maximum effective radiated power (ERP) of 99 Watts. K257BU will continue to employ the same antenna structure that currently supports its existing antenna (ASR No. 1025339).

The instant application is being filed so that K257BU can continue to retransmit the programming of KXPT once its licensed operating frequency on Channel 257 is displaced by the upgraded co-channel facilities of FM station KQMR, Indian Springs, Nevada, (FCC File No. BMPH-20010814AAX). K257BU provides vital fill-in coverage in certain areas within the city grade contour of KXPT, where direct off-air reception of KXPT's signal is extremely poor due to occurrences of first and third order overload products. The applicant believes the ongoing construction of KQMR's new Class C0 facility will be completed and operational in the very near future and for this reason requests that its proposal be processed expeditiously so that KXPT programming can be re-transmitted to the public without interruption.

The proposal on Channel 255 complies with the Commission's interference protection rules regarding all FM broadcast, FM translator and LP100 stations. Attached as Figure 1 is an allocation summary and interference analysis that was conducted to evaluate the K257BU modified facilities on Channel 255. The allocation summary indicates that there are no FM translators or Class D (secondary) non-commercial educational FM (NCE-FM) stations located close enough to require detail study, however, there were five FM broadcast stations found that are short of the minimum distance separation for commercial Class A stations and require further examination.

First, NCE-FM station KCEP, Channel 201C2, Las Vegas, Nevada, is short of the Class A intermediate frequency (I.F.) separation requirement in Section 73.207. Since the applicant proposes less than 100 Watts ERP, the translator is treated as a Class D station and is therefore not subject to the I.F. spacing requirements under Section 74.1204(g).

Second, KLUC-FM is a licensed commercial Class C broadcast station operating on second adjacent Channel 253. Since KLUC-FM is co-located with K257BU and operates with 30.04 dB more power, it is impossible for the translator to exceed the desired signals of the Class C facility by more than 20 dB at any location. Therefore, no actual interference will be caused to KLUC-FM in accordance with Section 74.1204(d).

Next, the modified operation of K257BU will not result in predicted contour overlap with commercial co-channel stations KHWY, Essex, California and KBZB, Pioche, Nevada in accordance with Section 74.1204(a). Figure 1 indicates that there is sufficient clearance between the interfering contours of K257BU and the protected contours of both KHWY and KBZB.

Last, the protected 60 dBu contour of commercial Class C0 station KQMR on second adjacent Channel 257 completely encompasses both the transmitter site and the 80 dBu interfering contour of K257BU. Figure 1 defines the predicted interference area within the 60 dBu contour of KQMR as the area bounded by the locus of points where the desired to undesired field ratio is equal to the standard interference protection ratio of 20 dB required in Section 74.1204(a) for stations separated in frequency by 400 kHz. Figure 1A is a 7.5 minute quadrangle map that shows the nature of the area where interference to KQMR is predicted to occur. Since the map shows that there is no evidence of population within the interference area, the translator will not result in any actual interference to KQMR and is not precluded by the prohibited overlap rule under the provisions of Section 74.1204(d).

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FIGURE 1
 LOHNES & CULVER
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 FM ALLOCATION STUDY
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PAGE 1

DATE June 25, 2002
 DB DATE June 8, 2002

JOB TITLE: K257BU TO CHANNEL 255

COORDINATES: 36-00-29.00 115-00-20.00 US

Average Terrain: 692.37 Meters

CHANNEL: 255 FM TRANSLATOR CLASS: D 1025.10m AMSL 332.73m HAAT -10.04 dBk 99.0 Watts

ALLOCATION SUMMARY

CALL STATUS	CITY STATE FILE #	CHANNEL CLASS	ERP-kW HAAT-m	LATITUDE LONGITUDE	DIST-km BEARING-deg	MINIMUM SPACING FOR CLASS A-km CLEARANCE-km
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KCEP LIC	LAS VEGAS NV BLED-19930617KA	201 C2	10.0000 364	36-00-31.00 115-00-22.00	0.08 321.42	15 short -14.92
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Note: The minor change application for K257BU is not subject to the intermediate frequency separation requirements in §73.207 since the specified ERP is less than 100 Watts.

202 no stations within minimum spacing distance required for Class A stations

252 no stations within minimum spacing distance required for Class A stations

KLUC-FM LIC	LAS VEGAS NV BLH-19870211KA	253 C	100.0000 360	36-00-29.00 115-00-20.00	0.00 0.00	95 short -95.00
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254 no stations within minimum spacing distance required for Class A stations

KHW LIC	ESSEX CA BLH-19950822KB	255 B	10.0000 327	34-52-50.00 115-04-05.00	125.22 182.60	178 short -52.78
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NOTE International status: OPER. Station is 242 km from Mexican border.

KBZB CP	PIOCHE NV BPH-20000517AAN	255 C	100.0000 597	37-27-40.00 114-27-55.00	168.31 16.43	226 short -57.69
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KBZB LIC	PIOCHE NV BLH-20000317ABQ	255 C	5.0000 1029	37-53-44.00 114-34-41.00	212.90 10.13	226 short -13.10
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256 no stations within minimum spacing distance required for Class A stations

KQMR CP	INDIAN SPRINGS NV BMPH-20010814AAX	257 C0	31.0 690	36-19-28.00 115-33-58.00	61.45 305.13	86 short -24.55
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NOTE Docket number 96-171

258 no stations within minimum spacing distance required for Class A stations

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CHANNEL: 255 FM TRANSLATOR CLASS: D 1025.10m AMSL 332.73m HAAT -10.04 dBk 99.0 Watts

INTERFERENCE ANALYSIS

CHANNEL 253
KLUC-FM LAS VEGAS NV US 36-00-29.00 115-00-20.00 class C status LIC file number BLH-870211KA
from database: 1050 meters amsl 360 meters haat 20.00 dbk

The distance between stations is 0.00 km
The bearing from K257BU to KLUC-FM is 0.00
The bearing from KLUC-FM to K257BU is 0.00
These stations are closer than the minimum distance separation requirement for a Class A station of 95.00 km

**** DESIRED KLUC-FM VS UNDESIRED K257BU ****

There is overlap between the protected contour of KLUC-FM and the K257BU interfering contour
KLUC-FM (60.00 dBu) vs K257BU (80.00 dBu) has an overlap of 8.22 at on-line bearing (0.00)

CONCLUSION: K257BU will not cause any actual interference to KLUC-FM in accordance with §74.1204(d) since the stations are co-located and the ERP for K257BU is 30.04 dB below the ERP of KLUC-FM

CHANNEL 255
KHWY ESSEX CA US 34-52-50.00 115-04-05.00 class B status LIC file number BLH-950822KB
from database: 1114 meters amsl 327 meters haat 10.00 dbk

NOTE: International status: OPER. Station is 242 km from Mexican border.

The distance between stations is 125.22 km
The bearing from K257BU to KHWY is 182.60
The bearing from KHWY to K257BU is 2.57
These stations are closer than the minimum distance separation requirement for a Class A station of 178.00 km

**** DESIRED KHWY VS UNDESIRED K257BU ****

There is no overlap at the furthest protected contour of KHWY from K257BU interfering contour
KHWY (54.00 dBu) vs K257BU (34.00 dBu) has a clearance of 44.32 at on-line bearing (2.57)

CHANNEL 255
KBZB PIOCHE NV US 37-27-40.00 114-27-55.00 class C status CP file number BPH-20000517AAN
from database: 2282 meters amsl 597 meters haat 20.00 dbk

The distance between stations is 168.31 km
The bearing from K257BU to KBZB is 16.43
The bearing from KBZB to K257BU is 196.76
These stations are closer than the minimum distance separation requirement for a Class A station of 226.00 km

**** DESIRED KBZB VS UNDESIRED K257BU ****

There is no overlap at the furthest protected contour of KBZB from K257BU interfering contour
KBZB (60.00 dBu) vs K257BU (40.00 dBu) has a clearance of 9.45 at -10 degree bearing
KBZB (60.00 dBu) vs K257BU (40.00 dBu) has a clearance of 7.31 at -5 degree bearing
KBZB (60.00 dBu) vs K257BU (40.00 dBu) has a clearance of 7.01 at on-line bearing (196.76)
KBZB (60.00 dBu) vs K257BU (40.00 dBu) has a clearance of 6.41 at +5 degree bearing
KBZB (60.00 dBu) vs K257BU (40.00 dBu) has a clearance of 7.62 at +10 degree bearing

FIGURE 1
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 LAUREL, MARYLAND
 FM ALLOCATION STUDY
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CHANNEL: 255 FM TRANSLATOR CLASS: D 1025.10m AMSL 332.73m HAAT -10.04 dBk 99.0 Watts

CHANNEL 255

KBZB PIOCHE NV US 37-53-44.00 114-34-41.00 class C status LIC file number BLH-20000317ABQ
 from database 2870 meters amsl 1029 meters haat 6.99 dbk

The distance between stations is 212.90 km
 The bearing from K257BU to KBZB is 10.13
 The bearing from KBZB to K257BU is 190.39
 These stations are closer than the minimum distance separation requirement for a Class A station of 226.00 km

***** DESIRED KBZB VS UNDESIRED K257BU *****

There is no overlap at the furthest protected contour of KBZB from K257BU interfering contour
 KBZB (60.00 dBu) vs K257BU (40.00 dBu) has a clearance of 80.18 at on-line bearing (190.39)

CHANNEL 257

KQMR INDIAN SPRINGS NV US 36-19-28.00 115-33-58.00 class C0 status CP file number BMPH-20010814AAX
 from database: 2660 meters amsl 690 meters haat 14.91 dbk

The distance between stations is 61.45 km
 The bearing from K257BU to KQMR is 305.13
 The bearing from KQMR to K257BU is 124.79
 These stations are closer than the minimum distance separation requirement for a Class A station of 86.00 km

***** DESIRED KQMR VS UNDESIRED K257BU *****

There is overlap between the protected contour of KQMR and the K257BU interfering contour
 KQMR (60.00 dBu) vs K257BU (80.00 dBu) has an overlap of 6.70 at on-line bearing (124.79)

NOTE: K257BU's site is located within KQMR's protected contour, and K257BU's interfering contour falls totally within KQMR's protected contour.

Points of no overlap to KQMR from K257BU interfering contours
 (Locus of points with required d/u field ratio)

KQMR desired dBu contour	relative bearing from KQMR to K257BU	true bearing from KQMR	interference boundary distance from KQMR (km)	K257BU undesired dBu contour	relative bearing from K257BU to KQMR	true bearing from K257BU	interference boundary distance from K257BU (km)
72.50	358.65	123.44	61.55	92.50	93.39	38.51	1.45
72.75	359.14	123.93	60.92	92.75	59.47	4.60	1.05
73.00	359.24	124.03	60.34	93.00	35.69	340.82	1.37
73.00	0.15	124.94	60.26	93.00	352.49	297.61	1.20
72.75	0.38	125.17	60.81	92.75	327.81	272.94	0.74
72.50	0.39	125.18	61.38	92.50	280.31	225.43	0.41

CONCLUSION: K257BU will not cause any actual interference to KQMR in accordance with §74.1204(d) since there is no population within the predicted interference area. (SEE ATTACHED QUADRANGLE MAP - FIGURE 1A)

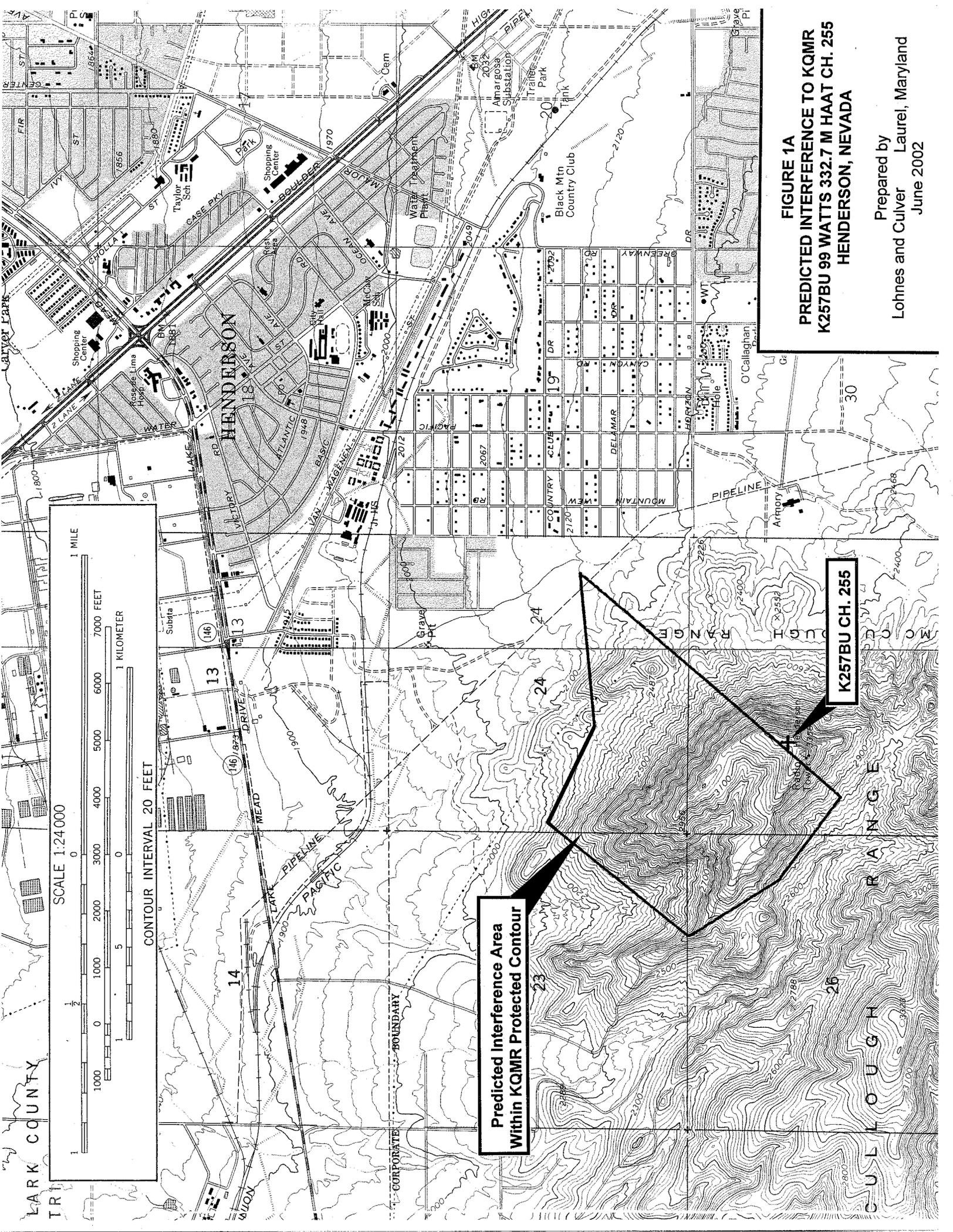


FIGURE 1A
PREDICTED INTERFERENCE TO QMR
K257BU 99 WATTS 332.7 M HAAT CH. 255
HENDERSON, NEVADA

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