

EXHIBIT 12 – COMPREHENSIVE TECHNICAL EXHIBIT

Discussion

This amended application is being filed in an effort to resolve a mutually exclusive situation involving Channel 284 at Las Vegas/Enterprise, NV. On July 29, 2016 competing applications were filed by two separate entities, both proposing the use of Channel 284 in the Las Vegas area. Major Market Radio, LLC, filed to move FM Translator K238AK to Las Vegas, NV, File No. BPFT 20160729AHI. Dale Ganske filed to move FM Translator K258CZ to Enterprise, NV, File No. BPFT 2016729AAS. These applications are mutually exclusive. It is believed the modification proposed in the instant application will establish two Singletons, allowing for their subsequent grant.

This application is being filed in the second of the 250 mile Translator Modification Application Filing Windows for AM Stations (DA15-1491). The proposed primary station is Class B, KENT (AM), Enterprise, NV. The purpose of this application is to change the location, of K258CZ (FID # 71816) from Big Pine, Etc., CA, to Las Vegas, NV, a distance of 169.028 miles between the current and proposed transmitter sites. The power is increased from 10 watts (vertical) non-directional to 250 watts (vertical) directional, with a change in frequency to Channel 244. This is a minor change under the terms of FCC DA 15-1491.

This application meets the fill-in requirement concerning translator and AM primary station contours in that the Primary station is a class B AM, and the proposed translator 60 dBu contour is contained within the 2 mV/m contour of primary station KENT and the translator 60 dBu does not extend beyond the 25 mile radius from the KENT transmitter. This is demonstrated on a map in **Figure 5** of this exhibit.

Contour Overlap Requirements

A study of all relevant co-channel, 1st, 2nd, and 3rd adjacent channels and I.F. relationships (**Figure 1**) reveals the absence of any conflict with the exception of full-service stations KXPT, Las Vegas, NV and KKLZ, Las Vegas, NV for which 2nd adjacent waivers are sought (see discussion below). The close relationship with co-channel KYLI, Bunkerville, NV is explored in **Figures 2,3 & 4**, showing the absence of any contour overlap.

AMEND K258CZ 250 MINOR MODIFICATION

Dale Ganske

REFERENCE
36 09 22.2 N.
115 15 32.0 W.

CH# 244D - 96.7 MHz, Pwr= 0.25 kW DA, HAAT= 54.8 M, COR= 864.4 M
Average Protected F(50-50)= 9.7 km
Standard Directional

DISPLAY DATES
DATA 08-11-16
SEARCH 08-11-16

CH CITY	CALL	TYPE	ANT STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
244C Bunkerville	KYLI	LIC	NHX NV	62.0 242.7	114.86 BLH20100623AEP	36 38 07.0 114 07 18.0	93.000 637	212.9 1755	99.5 Lkcm Rg Licenses, Llc	-100.9*	0.4
246C Las Vegas	KXPT	LIC	CN NV	226.2 46.0	30.28 BLH19960913KA	35 58 02.0 115 30 06.0	25.000 1120	10.0 2582	95.6 Lotus Broadcasting Corp.	12.6	-66.4*
242C Las Vegas	KKLZ	LIC	CX NV	125.8 306.0	28.09 BMLH20111201LCE	36 00 29.0 115 00 20.0	100.000 358	12.1 1056	83.1 Beasley Media Group, LLC	5.6	-55.2*
244D Sunrise Manor	KYLI-FM1	LIC	C NV	57.7 237.9	34.83 BLFTB20110404AET	36 19 24.0 114 55 49.0	0.340	62.0 826	19.9 Lkcm Rg Licenses Llc	-31.1*	0.2
244D Las Vegas	K244EX	CP	DC NV	109.5 289.6	18.87 BNPFT20130826ABC	36 05 58.0 115 03 39.0	0.005 -72	6.5 549	2.5 windy City Broadcasting, L	4.5	1.7
298C Pahrump	KXTE	LIC	CN NV	225.9 45.7	30.35 BLH19950817KE	35 57 57.0 115 30 03.0	24.500 1137	0.3 2595	6.5 cbs Radio Stations Inc.	28.5R	1.9M
244D Pahrump	K244CE	LIC	C NV	275.1 94.7	62.64 BLFT20031014ACY	36 12 14.0 115 57 16.0	0.170 -100	21.5 899	6.4 k244ce, Llc	34.3	33.6
246D Moapa	K246BK	LIC	C NV	48.5 228.9	88.79 BLFT20070723ABK	36 41 00.0 114 30 48.0	0.010 57	0.2 649	5.3 Community Education Founda	82.8	82.3
244C3 Lake Havasu City	KRCY-FM	LIC	CX AZ	151.3 331.9	202.85 BLH20080731ACG	34 33 06.0 114 11 37.0	0.260 825	102.6 1451	38.3 Rick L. Murphy	87.8	123.7
245D Riveria, Etc.	K245AW	CP	DC AZ	155.3 335.6	110.52 BMPFT20150526AAG	35 15 08.0 114 44 58.0	0.250	7.1 1530	4.0 Steven M. Greeley	90.9	88.0
241D Baker	K241AV	LIC	DC CA	217.0 36.6	100.05 BLFT20070604ABA	35 26 09.0 115 55 26.0	0.010 426	0.0 1381	3.1 Advance Ministries, Inc	90.6	95.9
245D Riveria, Etc.	K245AW	LIC	DH AZ	155.1 335.4	111.35 BLFT20080619AIH	35 14 48.0 114 44 32.0	0.157 683	1.7 1473	0.9 Steven M. Greeley	97.2	91.0
242D Bullhead City, Etc.	K242AS	CP	DV AZ	155.1 335.4	111.35 BPFT20151221AYZ	35 14 48.0 114 44 32.0	0.045	0.0 1468	1.8 Donald F. Hendren	98.8	108.9
242D Bullhead City, Etc.	K242AS	LIC	DH AZ	155.1 335.4	111.35 BLFT20060321AEI	35 14 48.0 114 44 32.0	0.040 678	0.0 1468	1.7 Donald F. Hendren	98.8	109.0

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.
All separation margins (if shown) include rounding.
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 restricted contour.
« = Station meets FCC minimum distance spacing for its class.
Reference station has protected zone issue: AM tower

2nd adjacent waivers sought

Figure 1

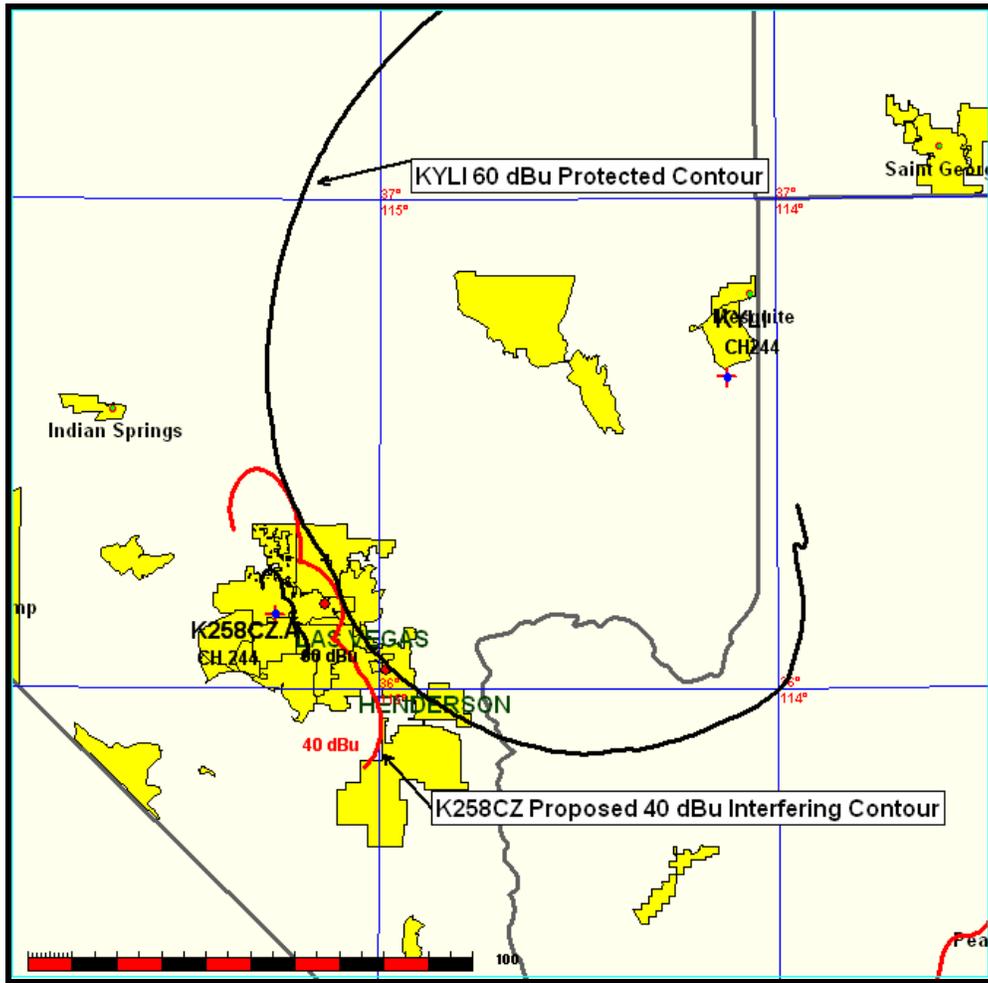


Figure 2

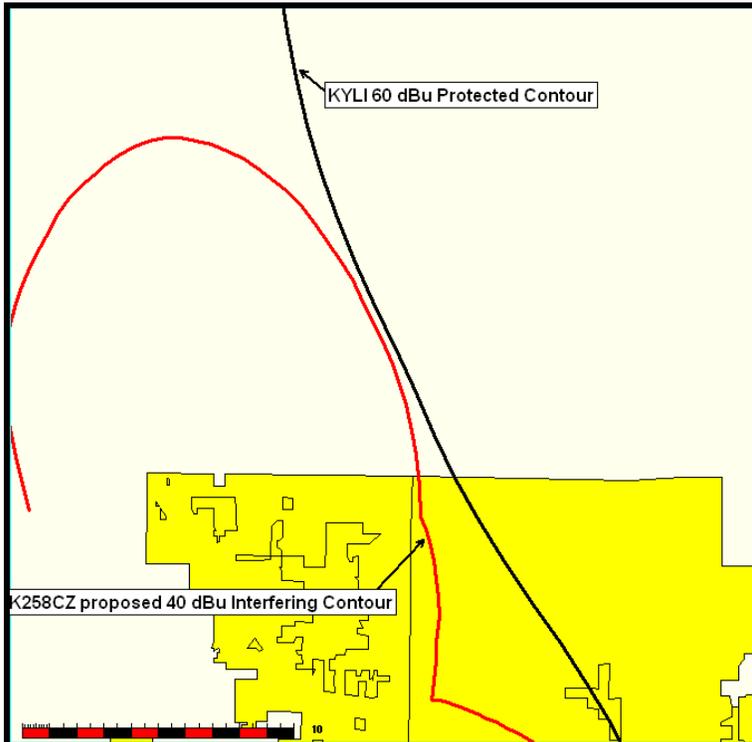


Figure 3

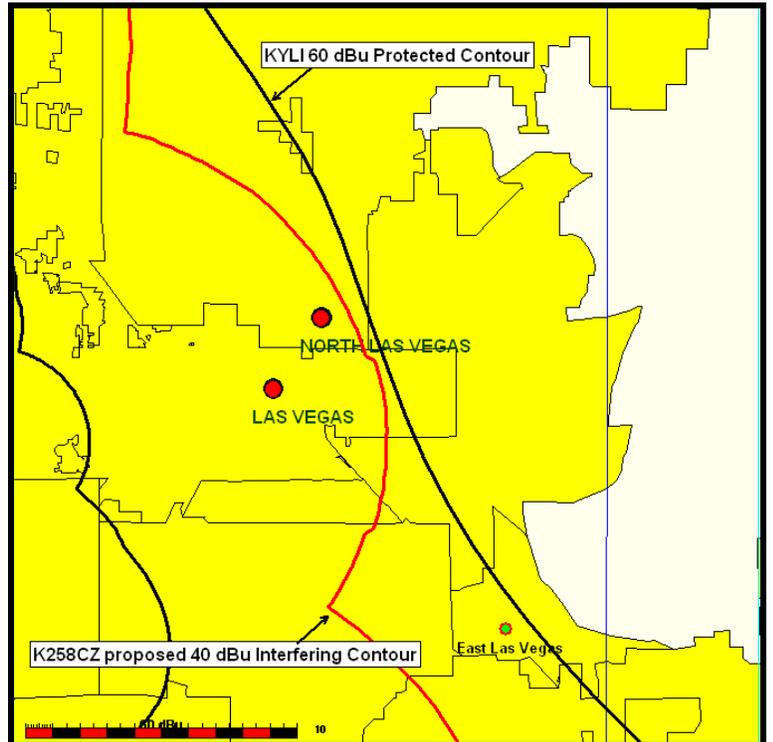


Figure 4

Waiver Request of Section 74.1204 and Showing of Compliance

The proposed FM translator is located within the protected 60 dBu F(50,50) contour of 2nd adjacent channel KXPT, Las Vegas, (**see Figure 1**).

The predicted F(50,50) field strength of KXPT at the proposed translator location is 88.2 dBu (free space equation). Using the Undesired-to-Desired method for calculating proposed interference, the proposed interfering contour with respect to KXPT is 128.2 dBu (88.2 + 40) (free space method employed). This interfering signal would, in the worst case, extend 43.4 meters from the proposed antenna and, with the proposed antenna CORAGL of 96 meters, would not reach the ground.

The proposed FM translator is located with the protected 60 dBu F(50,50) contour of 2nd adjacent channel KKLZ, Las Vegas, (**see Figure 1**).

The predicted F(50,50) field strength of KKLZ at the proposed translator location is 85.4 dBu (free space equation). Using the Undesired-to-Desired method for calculating proposed interference, the proposed interfering contour with respect to KKLZ is 125.4 dBu (85.4 + 40) (free space method employed). This interfering signal would, in the worst case, extend 59.2 meters from the proposed antenna and, with the proposed antenna CORAGL of 96 meters, would not reach the ground.

Since no population inhabits the interference area, the applicant respectfully requests waiver of the FM translator contour overlap requirements with respect to 2nd adjacent stations KXPT and KKLZ, as permitted in CFR Section 74.1204.

"FILL-IN" QUALIFICATION

K258CZ as "fill-in" FM Translator for KENT(AM)

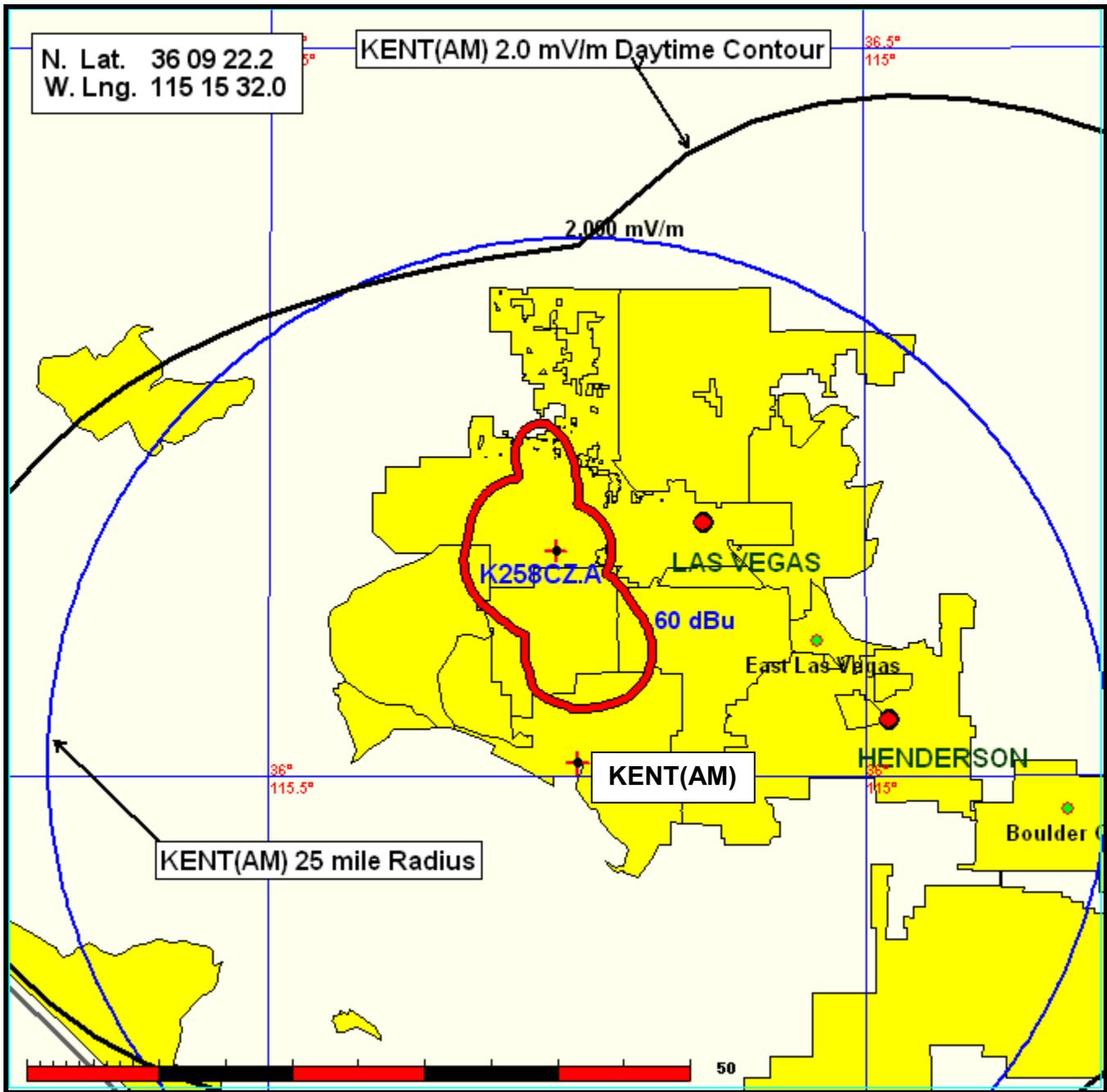


Figure 5

Environmental Compliance

Applicant proposes to mount the antenna on a currently registered tower. There will be no new construction. The antenna system will consist of a skewed array of two (2) Scala/Kathrein CL-FM Yagi antennas, one antenna oriented at 200 degrees radiating 50 % power, the second antenna oriented at 300 degrees radiating 50 % of the power. The Center-of-Radiation will be 96 meters AGL. The facility will radiate a maximum 250 watts Vertical only.

Using the online version of the FCC's FMModel software, and employing a worst-case scenario of an EPA Type 1 antenna, ignoring reduced downward radiation typical of the Yagi antenna, the resultant maximum RF electromagnetic field would be less than 0.9 microvolts/cm², 21.69 meters from the base of the tower, clearly less than the uncontrolled maximum.

The permittee/licensee in coordination with other users of the site will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.