

EXHIBIT 12-A

**Modify Translator Application BNPFT-20030317AIC
CH 300D 107.9 MHz – kW ERP Lockhart, TX
to
Proposed CH 300D – 107.9 MHz – 0.25 kW ERP - Luling, TX**

August 27, 2013

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Frank G McCoy (“McCoy”), applicant for FM translator application BNPFT-20030317AIC, Facility ID No. 143307, Channel 300D, Lockhart, Texas.

McCoy herein proposes to modify the existing BNPFT-20030317AIC application by relocating to an existing tower site and increasing the transmit power from 200 watts ERP with a directional antenna to 250 watts ERP directional. The proposed facility will operate on Channel 300D (107.9 MHz) with 250 watts ERP at 83 meters height above average terrain. The modified BNPFT-20030317AIC will be used as a fill-in translator for KXTN-FM Channel 298C, Facility ID No. 67064, licensed to San Antonio, Texas. McCoy has obtained permission to retransmit KXTN-FM from Tichenor License Corporation, licensee of KXTN-FM. Exhibit 10 is a map which shows compliance with FCC Section 74.1201(g) by demonstrating that the proposed BNPFT-20030317AIC FCC F(50,50) 60 dBu contour is contained inside the licensed KXTN-FM FCC F(50,50) 60 dBu contour.

The proposed BNPFT-20030317AIC modification is located within 39 km. of the Austin LPFM grid and therefore it is required to provide an LPFM Preclusion Study as part of this application. Austin is Arbitron metro rank #37 and was included in Appendix A, the list of 156 Arbitron metros subject to revised processing rules for FM translators as part of the Local Community Radio Act of 2010. Austin is listed as a Spectrum Limited Market with a 30 x 30 LPFM grid. The LPFM Preclusion Study has been attached as Exhibit 12-B.

Austin is a Top 50 Market and therefore a Top 50 Transmitter Site Test is included as Exhibit 12-C.

Exhibit 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. This channel study is provided as a courtesy to Commission staff to help identify potential contour overlap with other FM facilities.

Exhibit 13-B shows compliance with FCC Section 74.1204(e). Although there is predicted interference to KXTN-FM in a small area and population, the interference does not occur in or near San Antonio, TX, the city of license of primary station KXTN-FM. Such interference is permissible under Section 74.1204(e) for a translator operating on a first, second or third adjacent channel to the primary station. Although the Class A Channel Study shows short spacings to KIXS, KFAN-FM, and Channel 300D translator applications in Austin, TX and Greenshores, TX, no contour overlap occurs and there is substantial distance between the protected and interfering contours.

of the proposed BNPFT-20030317AIC modification and those stations. Therefore, no Section 74.1204 contour protection maps are provided for those stations.

Exhibit 13-C shows compliance with Section 74.1233(a) (Common Overlap). The FCC F(50,50) 60 dBu contours of the 2003 application and the proposed application modification overlap.

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

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