

EXHIBIT 12
TECHNICAL STATEMENT
TUCSON, ARIZONA 277D
KEVIN J. YOUNGERS
FCC FORM 349
MARCH 2013

This Technical Statement is in support of a minor change application, FCC form 349, being filed on behalf of Kevin J. Youngers in regards to a new FM translator from the Auction 83 Filing Window, application BNPFT-20030317EFR for in Tucson, Arizona, facility ID 155925.

Kevin J. Youngers is proposing to relocate to an existing tower site, ASR 1200291, at the coordinates N. $32^{\circ}-13'20''$, W. $110^{\circ}-52'55''$, NAD 27. The proposed operation will use a PSI, circularly polarized, directional antenna system with an Effective Radiated Power of 99 Watts.

The antenna will be mounted at 77 meters Above Ground Level, with a Center of Radiation at 854 meters Above Mean Sea Level. Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the first two records in the table of Figure 1, there are apparent short spacings, but these are the same facility as this proposal and will be replaced by this application. The only pertinent records for further study are:

- 1) KCDX Florence, Arizona 276C Construction Permit
- 2) KRDX Corona De Tucso, Arizona 279A Reserved Point
- 3) K274AQ Tucson, Arizona 274D License

Figures 2 and 3 are predicted coverage maps showing the 54 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of the CP for KCDX Florence, Arizona on channel 276C. Figure 3 is a magnified version of figure 2. As can be seen, there is no prohibited overlap between these two contours.

The proposed site is located within the protected 60 dB contour of 2nd adjacent reserve point of KRDX Corona De Tucso, Arizona on channel 279A . This is the reserve point for the KRDX granted Construction Permit, application BPH-20070601BRS, and does not need contour protection.

Figure 4 is a predicted coverage map showing the 100 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of K274AQ Tucson, Arizona on channel 274D. As can be seen, there is no prohibited overlap between these two contours.

The proposed operation of the new translator will operate as a fill-in translator for KLTU(FM) Mammoth, Arizona on channel 201C1, facility ID 79359. Figure 5 shows that the 60 dB contour of the proposed operation of a new translator in is entirely within the 60 dB contour of KLTU.

Figure 6 shows the overlap between the 60 dB contours of the proposed facility, in red, and the current application, in blue, seeking to be modified by this application.

This proposal meets Sections 2.1.2 and 2.1.3 of Annex 1 of the Agreement Between the Government of the United States of America and the Government of the United Mexican States Relating to the FM Broadcasting Service in the Band 88-108 Mhz. Figure 7 shows that the proposed 34 dB interference contour F(50,10) does not exceed 32 km (violet circle) in the direction of Mexico. Figure 8 shows that the ERP is limited to 50 Watts in the direction of Mexico. Figure 9 shows that the 60 dB protected contour F(50,50) does not exceed 8.7 km (violet circle) in the direction of Mexico.

It was concluded that the proposed operation of a new translator in Tucson, Arizona on 277D will not cause any harmful interference to any existing stations and will be in full compliance with the Commission's rules. Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.