

EXHIBIT 12  
TECHNICAL STATEMENT  
NEW CANTON, GEORGIA 280D  
DAVIS BROADCASTING OF ATLANTA, L.L.C.  
FCC FORM 349  
APRIL 2018

This Technical Statement is in support of a long form application, FCC form 349, being filed on behalf of Davis Broadcasting of Atlanta, L.L.C. in regards to a new translator for Canton, Georgia on channel 280D with new facility ID #203141.

Davis Broadcasting of Atlanta, L.L.C. is proposing to use an existing site, WCHK(AM) site, at the coordinates N. 34°-15q08±, W. 84°-27q49±, NAD 27 and rebroadcasting WCHK(AM) Canton, Georgia, facility ID #10694. The proposed operation will use a Nicom BKG77 4-bay antenna 0.85-wavelength-spaced with an Effective Radiated Power of 250 Watts. The antenna will be mounted at 56 meters Above Ground Level, with a Center of Radiation at 322 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the third line of the table of Figure 1, there is an apparent conflict to a record for call letter 1777868, but this facility is the tech box that will be replaced by this application. The only pertinent records for further study are:

- 1) WALR-FM Palmetto, Georgia 281C1 License
- 2) WVEE Atlanta, Georgia 277C0 License
- 3) WPPL Blue Ridge, Georgia 280A License

Figure 2 is the predicted coverage map showing the 54 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of WALR-FM Palmetto, Georgia on channel 281C1. As can be seen, there is no prohibited overlap between these two contours.

The proposed site is located within the protected contours of 3<sup>rd</sup> adjacent station

WVEE Atlanta, Georgia on channel 277C0. The predicted F(50-50) field strength at the proposed transmitter site of WVEE is 67.8 dB . The worst-case 3<sup>rd</sup> adjacent interference would be the 107.8 dB interference contour F(50,10) of WVEE. Figure 3 is an aerial image of this 107.8 dB interference contour F(50,10), which can travel up to 451.6 meters. Note that there are no buildings closer than 127 meters to the tower.

Figure 4 is a table showing the vertical clearance of the interference contour based on the antenna relative field for various depression angles below horizontal for the antenna. The minimum vertical clearance for anything outside 99.4 meters from the base of the tower is 15.5 meters at a depression angle from horizontal of 10 degrees. There are no inhabited buildings that are taller than 15.5 meters, over 50 feet, within the 107.8 dB interference contour F(50,10) of the proposed translator. The applicant, Davis Broadcasting of Atlanta, L.L.C., respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference.

Figure 5 is the predicted coverage map showing the 40 dB interference contour F(50,10) of the proposed operation and the 60 dB protected contour F(50,50) of WPPL Blue Ridge, Georgia on channel 280A. As can be seen, there is no prohibited overlap between these two contours.

Figure 6 shows the overlap of the 60 dB contours of the proposed facility and the current tech box seeking to be modified by this application. Note that the contours are the same.

The proposed operation of new translator will operate as a fill-in for WCHK(AM) Canton, Georgia, facility ID #10694. Figure 7 shows that the 60 dB contour F(50,50) of the new translator is fully within the 2 mV/m contour of WCHK(AM).

It was concluded that the proposed operation of new translator in Canton, Georgia on 280D 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.