

## **EXHIBIT 12-A**

**Modify K239BI FM Translator Station  
96.1 MHz – 0.100 kW High Ridge, MO  
to  
Proposed CH 244D – 96.7 MHz – 0.250 KW @ St. Louis, MO**

**July 4, 2012**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Missouri River Christian Broadcasting, Inc. ("MRCB"), licensee of FM translator station K241BS, Channel 241D, High Ridge, Missouri. On July 12, 2011 the FCC released FCC 11-105, THIRD FURTHER NOTICE OF PROPOSED RULE MAKING, which includes a freeze on any move-in involving an FM translator authorized from Auction 83. However, it also states the freeze does not apply to a translator modification which would move the transmitter site from one location to another "within the same spectrum-limited market." Since the current licensed site of K241BS is located in Jefferson County Missouri, which is part of the St. Louis Arbitron Metro, it is believed that this Form 349 application is not affected by the announced freeze on translator move-in applications. Exhibit 12-B is a map showing the licensed location of FM translator station K241BS is located well within the St. Louis Arbitron Metro boundaries.

On March 19, 2010 The FCC adopted FCC 12-29, The Fourth Report and Order and Third Order on Reconsideration which included Revised Translator Application Processing and Dismissal Policies. Applications from the 2003 FM translator window located in "Spectrum Limited" markets are now required to demonstrate that the application does not displace any "grid points" reserved for future LPFM stations.

On May 16, 2012, The FCC held a Low Power FM and FM Translator Public Forum in part to explain and clarify the policies adopted in the Fourth Report and Order and Third Order on Reconsideration. During the Q&A portion of the Public Forum it was explained that existing licensed translators located in a spectrum limited market could file an FCC Form 349 minor modification application without an LPFM non-displacement showing. Therefore it is believed that this K241BS minor modification application is compliant with all current FCC rules.

The FCC also has appeared to establish a policy concerning potential statutory and rules violations related to translator “hopping” for licensed translators filing a third modification application in a relatively short time frame. DA 12-185, Otherwise known as the Power Radio letter, requests documentation from the licensee to demonstrate that the previously granted translator construction permits were constructed and operated in compliance with all FCC rules. MRCB has attempted to provide adequate documentation as requested in the Power Radio letter. That documentation is included as Exhibit 1 of this application.

MRCB herein proposes to modify the existing license of K241BS (currently operating on Channel 241D at High Ridge, MO) by changing the frequency to third adjacent channel 244D (96.7 MHz) and relocating to an existing tower associated with ASR #1007729, which is located in Brentwood, MO. The proposed K241BS will operate with 250 watts ERP at 138.3 meters height above average terrain. The modified K241BS will be used

as a fill-in translator for KFTK Channel 246C1, licensed to Florissant, MO. MRCB has obtained permission to retransmit KFTK from Emmis Radio License, LLC licensee of KFTK. Exhibit 10 is a map depicting that the proposed K241BS 60 dBu contour is contained well inside the licensed KFTK 60 dBu contour.

Exhibits 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. The channel study indicates short spacing to six full power stations based on Class A spacing. This application is short spaced to primary station KFTK Channel 246C1, Florissant, MO,

Exhibit 13-B shows that the proposed K241BS interfering contour with respect to the licensed facility of KIHT is 150.2 dBu. The interfering contour is calculated to extend only three meters from the antenna and therefore does not reach anywhere near the ground. No interference exhibit is provided for the KIHT application site. This application is a coordinate correction of the ASR associated with the KIHT licensed facility and will operate with a higher ERP and is located 0.1 km closer to the K241BS application site. Therefore the K241BS interfering contour for the KIHT application site will extend from the antenna less than 3.0 meters.

Exhibit 13-C addresses the short spacing with primary station KFTK Channel 246C1 licensed to Florissant, MO. The interfering contour with respect to KFTK is 111.4 dBu. Exhibit 13-C shows that an area of interference to primary station KFTK exists. This second adjacent area of interference is limited to approximately 0.9 sq. km. and 548

persons (2010 Census data). Exhibit 13-C clearly shows that this interference is not located in or near Florissant, MO, the city of license for primary station KFTK. It is believed that this interference is permitted under Section 74.1204(e) of the Commission's rules.

Exhibit 13-D demonstrates that the proposed K241BS facility will not overlap contours with KFTK-FM1, a booster station for KFTK, operating on Channel 246D.

Exhibit 13-E demonstrates no contour overlap between the proposed K241BS facility and KCMQ Channel 244C1, licensed to Columbia, MO.

Exhibit 13-F demonstrates there will be no contour overlap between the proposed K241BS facility and WCXO Channel 244A, licensed to Carlyle, IL.

Exhibit 13-G demonstrates compliance with Section 74.1233(a) by showing common overlap the FCC F(50,50) 60 dBu contours of the licensed facility of K241BS on Channel 241D at High Point, MO and the proposed facility of K241BS on Channel 244D at St. Louis.

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 K241BS facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.