

EXHIBIT 12  
TECHNICAL STATEMENT AND REQUEST FOR EXPEDITED PROCESSING  
W270CU ROANOKE, VIRGINIA 270D  
WVJT, LLC  
FCC FORM 349  
JANUARY 2017

This Technical Statement is in support of a minor modification, FCC form 349, being filed on behalf of WVJT, LLC, to the CP, file number BMPFT-20160125AAS, for FM translator W270CU Roanoke, Virginia, facility ID 145165. WVJT, LLC is respectfully requesting expedited processing as the current CP for this facility expires on January 27, 2017.

WVJT, LLC is proposing to relocate to an existing site at the coordinates N. 37°-16q00+, W. 79°-53q45+, NAD 27 on channel 270D with an Effective Radiated Power of 1 Watt. The Shively 6812C, 1-bay, nondirectional antenna system will be mounted at 18 meters Above Ground Level, with a Center of Radiation at 358 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the new translator. In the second line of the table of Figure 1, there is an apparent short spacing, but this is the same facility as this proposal and will be replaced by this application. The pertinent records for further study are:

- 1) WVMP Vinton, Virginia 268A License
- 2) WBZS Shawsville, Virginia 273A License

The proposed site is located within the protected 60 dB contour of 2<sup>nd</sup> adjacent station WVMP Vinton, Virginia on channel 268A. The predicted F(50-50) field strength of WVMP at the proposed transmitter site is 90.1 dB . Therefore, the predicted interfering signal contour F(50-10) generated by the proposed facility to WZAK is an additional 40 dB at 130.1 dB . The maximum distance to the 130.1 dB interference contour is 2.2 meters. The transmit antenna will be mounted 18 meters Above Ground Level, so the area

of interference will not reach within 15 meters of the ground and will not cover any population.

The applicant, WVJT, LLC, 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 2 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 WBZS Shawsville, Virginia on channel 273A. As can be seen, there is no prohibited overlap between these two contours.

Figure 3 shows the 60 dB contour of the proposed facility, red contour, overlaps the 60 dB contour of the current CP, blue contour.

The proposed operation of W270CU will operate as a fill-in translator rebroadcasting WZZI Bedford, Virginia, facility ID #15188. Figure 4 shows that the 60 dB contour of the proposed operation of W270CU is entirely within the WZZI 60 dB contour.

It was concluded that the proposed operation of W270CU in Roanoke, Virginia on 270D 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.