

## **EXHIBIT 12-A**

**Modify K269AL FM Translator Station  
101.7 MHz – 0.033 kW ERP Jenny Lind, AR  
to  
Proposed CH 270D – 101.9 MHz – 0.250 KW @ Fort Smith, AR**

**March 24, 2011**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Fred H. Baker, Jr. ("Baker"), licensee of FM translator station K269AL, Channel 269D, Jenny Lind, Arkansas. 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. K269AL was granted its original construction permit BPFT-19810217KQ on August 20, 1981 and was not part of FCC Auction 83 which occurred in March, 2003. The current licensed site of K239BI is located in Sebastian County, Arkansas, which is part of the Fort Smith, AR Arbitron Metro. It is believed that this Form 349 application is not affected by the announced freeze on translator move-in applications.

Baker herein proposes to modify the existing license of K269AL by changing the frequency to first adjacent channel 270D (101.9 MHz) and relocating to an existing tower associated with ASR #1040841, which is located in Fort Smith, AR. The proposed K269AL will operate with 250 watts ERP at 166.2 meters height above average terrain. The modified K269AL will be used as a fill-in translator for KFSA(AM) 950 kHz, licensed to Fort Smith, AR. BAKER has obtained permission to retransmit KFSA(AM) from the licensee of KFSA(AM). Exhibit 10 is a map depicting that the

proposed K269AL 60 dBu contour is contained well inside the licensed KFSA(AM) 2.0 mV/M daytime dBu contour. No portion of the proposed K269AL FCC F(50,50) 60 dBu contour will extend beyond 25 miles from the KFSA(AM) transmitter location..

Exhibits 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. The channel study indicates a total of two short spacings based on Class A spacing. This application is short spaced to KMXF(FM) Channel 270C2, Lowell, AR and KTFX-FM Channel 269C3, Warner, OK.

Exhibit 13-B shows that the proposed K269AL FCC F(50,10) 40 dBu interfering contour does not overlap with the KMXF FCC F(50,50) 60 dBu protected contour. Exhibit 13-C shows that the proposed K269AL FCC F(50,10) 54 dBu interfering contour does not overlap with the KTFX-FM FCC F(50,50) 60 dBu protected contour.

Exhibit 13-D demonstrates compliance with Section 74.1233(a) by showing common overlap the FCC F(50,50) 60 dBu contours of the licensed facility of K269AL at Jenny Lind, AR and the proposed facility of K269AL on Channel 270D at Ft. Smith, AR.

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 K269AL facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.