

Exhibit 12

**New FM Translator Station
BNPFT-20170801ADY
Proposed CH 272D – 102.3 MHz – 0.140 KW
Eureka Springs, AR
November 10, 2017**

Technical Narrative

This Technical Narrative and attached exhibits were prepared on behalf of Carroll County Broadcasting, Inc. (“Carroll”), licensee of Class D AM Station KTHS 1480 kHz, Facility ID No. 35668, Green Forest, AR. Carroll herein is herein an FCC Long Form 349 application to complete the application for BNPFT-20170801ADY for a new FM translator at Eureka Springs, AR. KTHS did not participate in the 2016 250 mile AM filing window and therefore is eligible for the first AM filing window for new FM translators for Class C and D AM stations.

The proposed new facility will be used as a fill-in translator for co-owned primary station KTHS(AM), licensed to Green Forest, AR. The proposed new facility would operate on Channel 272D (102.3 MHz) with 140 watts directional with the transmit antenna located at 66 meters height above ground level and 180 meters HAAT. Exhibit 10 demonstrates that the proposed FCC F(50,50) 60 dBu contour of the new facility is contained within the KTHS 2.0 mV/M daytime contour. Therefore it is believed that this application is in compliance with Section 74.1201(g) of the Commission’s rules.

Two changes to the Short Form Tech Box have been made. In Section 9. Effective Radiated Power the ERP has been increased from 130 watts to 140 watts. In Section 10. Transmitting Antenna, The rotation has been modified from 235 degrees to 60 degrees. These are considered

minor modifications and thus is permitted per the instructions provided in DA 17-1069, *Media Bureau Announces FM Translator Filing Window for Long-For Applications*. Exhibit 13-A is a channel study that assumes a Class A 6 kW facility operating on channel 272 and is provided to FCC staff as a convenience to help identify potential contour overlap issues. Exhibit 13-B shows Section 74.1204 contour protection to K272DQ Fayetteville, AR. Exhibit 13-C shows Section 74.1204 contour protection to second adjacent full power FM station KMXF, Channel 270C2, Lowell, AR. Exhibit 13-D shows Section 74.1204 contour protection to second adjacent full power FM station KHBZ, Channel 275C1, Harrison, AR. Exhibit 13-E shows Section 74.1204 contour protection to first adjacent full power FM station KIXQ, Channel 273C1, Joplin, MO. LPFM station construction permit BNPL-20131114BQM for KEGQ-LP, Channel 272L1, Kimberling City, MO expired on November 6, 2017. Exhibit 13-F shows Section 74.1204 contour protection to co-channel full power FM station KCJC, Channel 272C3, Dardanelle, AR. No interference will be delivered or received from any existing FM translator station or low power FM (LPFM) facility.

A study has been undertaken to show the proposed facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.