EXHIBIT 12
TECHNICAL STATEMENT
CLEVELAND, OHIO 283D
KEVIN J. YOUNGERS
FCC FORM 349
SEPTEMBER 2013

This Technical Statement is in support of a minor change application, FCC form 349, being filed on behalf of Kevin J. Youngers in regards to a new FM translator from the Auction 83 Filing Window, application BNPFT-20030317LOD for Cleveland, Ohio, facility ID 157726. This amended version is in response to concerns sited in a Petition to Dismiss or Deny filed by Radio Seaway, Inc., "Radio Seaway" on September 10, 2013. This amendment changes the antenna to a Nicom BKG77 2-bay, 0.85 wavelength-spaced, antenna.

Kevin J. Youngers is proposing an existing tower site, ASR 1219643, at the coordinates N. 41°-29ô13ò, W. 81°-41ô02ò, NAD 27. The proposed operation will use a Nicom BKG77 2-bay, 0.85 wavelength-spaced, antenna with an Effective Radiated Power of 20 Watts.

The antenna will be mounted at 80 meters Above Ground Level, with a Center of Radiation at 258 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 short spacing, but this is the same facility as this proposal and will be replaced by this application. The only pertinent records for further study are:

1) WQKT Wooster, Ohio 283B License

2) WQAL Cleveland, Ohio 281B License

3) WCLV Lorrain, Ohio 285A License

Figure 2 is a predicted coverage map showing the 34 dBε interference contour F(50,10) of the proposed operation and the 54 dBε protected contour F(50,50) of WQKT

Wooster, Ohio on channel 283B. As can be seen, there is no prohibited overlap between these two contours.

The proposed site is located within the protected contours of 2nd adjacent stations WQAL Cleveland, Ohio on channel 281B and WCLV Lorrain, Ohio on channel 285A. The predicted F(50-50) field strength of WQAL at the proposed transmitter site is 82.8 dBε and the maximum distance to the interfering contour is 22.8 meters. The predicted F(50-50) field strength of WCLV at the proposed transmitter site is 62.1 dBε and the maximum distance to the interfering contour is 246.3 meters.

Figure 3 is a table of the interference Minimum Vertical Clearance for the Nicom BKG77 2-bay, 0.85 wavelength-spaced, antenna as a function of the depression angle. For the various depression angles, the 5th column shows the horizontal distance from the base of the tower and the 6th column (last) shows the vertical clearance of the interference zone.

The minimum clearance within 53.5 meters from the tower occurs at 40.7 meters from the tower and is 9.5 meters (31.2 feet). Figure 3A is an aerial view with two blue tinted circles. The inner circle is a radius of 40.7 meters and the outer circle is a radius of 53.5 meters. Figures 3B and Figure 3C show that there are no buildings taller than 9.5 meters (31.2 feet) within either circle.

The minimum clearance from a distance of 53.5 meters from the tower to 120.2 meters from the tower occurs at 53.5 meters from the tower and is 16.3 meters (53.5 feet). Figure 3D is an aerial view with two blue tinted circles. The inner circle is a radius of 53.5 meters and the outer circle is a radius of 120.2 meters. Figures 3E, 3F, and 3G show that there are no buildings taller than 16.3 meters (53.5 feet) within this area.

The minimum clearance from a distance of 120.2 meters from the tower to 246.3 meters from the tower occurs at 169.1 meters from the tower and is 34.7 meters (113.8 feet). Figure 3H is an aerial view with two blue tinted circles. The inner circle is a radius of

120.2 meters and the outer circle is a radius of 246.3 meters. Figures 3J and 3K show that there are no buildings taller than 34.7 meters (113.8 feet) within this area except the silo and support building in Figure 3L, which is at most 130 feet tall. This silo and support building are between 211.4 and 246.3 meters from the tower and would need to be taller than 42.7 meters (140.1 feet) to be in the interference zone.

Radio Seaway cited 5 active businesses in the area that might experience interference: NCBC, Allied Corporation, Buckeye Partners, Arc Terminal, and Inland.

Figure 3M shows NCBC which is about 144 meters from the tower site. The business would need to be taller than 30.5 meters (100 feet) to reach the interference zone. It is not.

Figure 3N shows the tallest building at Allied Corporation which is about 169 meters from the tower site. The building would need to be taller than 34.7 meters (113.8 feet) to reach the interference zone. It is not.

Figure 3P shows the building at Buckeye Partners which is about 121 meters from the tower site. The building would need to be taller than 121 meters (119.1 feet) to reach the interference zone. It is not.

Figure 3Q shows the building at Arc Terminal which is over 120 meters from the tower site. The building would need to be taller than 34.7 meters (113.8 feet) to reach the interference zone. It is not.

Figure 3R shows the building at Inland which is over 224 meters from the tower site. Figure 3L also shows a different view of the silo and support building. According to Inland, the maximum height is at most 130 feet. The building would need to be taller than 42.7 meters (140.1 feet) to reach the interference zone.

In summary, there are no businesses or residences in the interference zone. The minimum vertical clearance in the interference zone is 9.5 meters (31.2 feet), so no traffic on any roads will experience any interference. The applicant, Kevin J. Youngers,

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 4 shows the overlap between the 60 dBε contours of the proposed facility, in red, and the current tech box, in blue, seeking to be modified by this application.

This proposal meets Section 4 of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement between the Government of Canada and the Government of the United States of America relating to the FM Broadcasting Service. The ERP at 20 Watts does not exceed 50 Watts. Figure 5 shows that the proposed 34 dBε interference contour F(50,10) does not exceed 32 km (violet circle) in any direction.

It was concluded that the proposed operation of a new translator in Cleveland, Ohio on 283D 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.