

## **EXHIBIT 12**

**K258CH CP BPFT-20160729ACE CH 296D – 107.1 MHz – 0.200 kW  
Jackson, MS  
to  
K258CH Proposed CP Mod BPFT-20160729ACE CH 296D – 107.1 MHz – 0.195 kW  
Jackson, Mississippi**

**May 11, 2017**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of New South Radio, Inc., ("NSRI"). NSRI proposes to modify K258CH construction permit BPFT-20160729ACE by changing the transmit antenna, increasing the center of radiation height above ground level from 124 meters to 128 meters and decreasing the effective radiated power from 200 watts non-directional to 195 watts non-directional. The proposed K258CH application site is an existing tower 128.6 meters in overall height and associated with FCC Antenna Structure Registration ("ASR") 1041136. The application site coordinates are 32-23-12 N. ~ 90-09-47 W. (NAD 27). K258CH would operate with .195 kW at 128 meters AGL and 126 meters HAAT. The modified K258CH will be used as a fill-in translator for Class D AM station WSFZ, 930 kHz, Facility ID Number 62049, licensed to Jackson, MS.

Exhibit 10 demonstrates compliance with FCC Section 74.1201(g) for use as a Fill-In Translator. The proposed K258CH FCC F(50,50) 60 dBu contour is contained within the WSFZ 2.0 mV/M daytime contour. Therefore it is believed this application is in compliance with Section 74.1201(g) of the Commission's rules as a fill-in translator.

Exhibits 13-A is a channel study using Section 73.207 spacing for Class A FM stations. The study is provided as a convenience to FCC staff. Exhibit 13-B demonstrates Section 74.1204 contour protection to second adjacent full power FM station WSTZ-FM, Channel 294C, Vicksburg, MS. Exhibit 13-C demonstrates Section 74.1204 contour protection to co-channel full power FM Station WBYP, Channel 296C3, Belzoni, MS. Exhibit 13-D demonstrates Section 74.1204 contour protection to WKXI-FM, Channel 298C1, Magee, MS. An exhibit demonstrating compliance with Section 74.1233(a) "Common Overlap" is not included. However, Exhibit 13-E demonstrates the current K258CH licensed facility and the proposed K258CH construction permit modification are located within 250 miles of each other.

No interference will be delivered or received from any existing translator station or low power FM (LPFM) facility. A study has been undertaken to show the proposed K258CH facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.