

## **EXHIBIT 12**

**Modify FM Translator K271CR  
Construction Permit BPFT-20180514AAE  
Channel 271D - 102.1 MHz - 0.250 kW  
Casa Grande, AZ**

**to**

**Channel 271D - 102.1 MHz - 0.250 kW  
Santan, AZ**

**May 12, 2019**

### **Technical Narrative**

This Technical Narrative and attached exhibits were prepared on behalf of Farmworker Educational Radio Network, Inc. ("FERNI"). FERNI has filed FCC Form 345 BALFT-20190226AAH to acquire the license of K271CR, Facility ID No. 146671, Channel 271D, Casa Grande, AZ from Mountain Community Translators, LLC and that application is pending. FERNI is filing this FCC Form 349 to modify K271CR construction permit BPFT-20180514AAE. This application is being filed as contingent upon the FCC approval of FCC Form 345 BALFT-20190226AAH and the assignment of the K271CR license to FERNI. The proposed K271CR modification will bring K271CR into compliance with FCC Section 74.1201(g). The modified K271CR will be used as a fill-in translator for co-owned Class B AM station KNAI, 860 kHz, Facility ID Number 1326, licensed to Phoenix, AZ. K271CR would operate with .250 kW directional at 180 meters AGL and 167 meters HAAT.

Exhibit 10 demonstrates compliance with FCC Section 74.1201(g) for use as a Fill-In Translator. The proposed K271CR FCC F(50,50) 60 dBu contour is contained within the KNAI 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 co-channel full power FM station KAHM licensed facility on Channel 271C, Prescott, AZ and KAHM construction permit BPH-20100813BHN, Channel 271C, Spring Valley, AZ. Exhibit 13-B demonstrates Section 74.1204 contour protection to second adjacent full power FM station KNIX-FM, Channel 273C, Phoenix, AZ and third adjacent channel full power FM station KALV-FM, Channel 268C, Phoenix, AZ. Exhibit 13-D demonstrates Section 74.1204 contour protection to first adjacent channel FM translator K270BZ, Phoenix, AZ. Exhibit 13-E demonstrates compliance with 74.1233(a) "Common Overlap". The licensed and proposed K271CR FCC F(50,50) 60 dBu contours overlap.

A study has been undertaken to show the proposed K271CR facility is in compliance with the Commission's radio frequency emission limits and is attached as Exhibits 17-A and 17-B.