

EXHIBIT 12

**Modify FM Translator K300CM
Proposed CH 300D – 107.9 MHz – 0.25 kW ERP - Luling, TX
to
Proposed CH 247D - 97.3 - 0.17 kW ERP - Lockhart, TX**

March 11, 2014

TECHNICAL NARRATIVE

This Technical Narrative and attached exhibits were prepared on behalf of Frank G McCoy (“McCoy”), permittee of FM translator construction permit K300CM, Luling, Texas.

McCoy herein proposes to modify the K300CM construction permit BNPFT-20030317AIC application by changing to I.F. Channel 247D (53 channels removed), relocating to an existing tower site and decreasing the transmit power to 170 watts ERP with a directional antenna. The proposed facility will operate on Channel 247D (97.3 MHz) with 170 watts ERP at 124 meters height above average terrain. The modified K300CM will be used as a fill-in translator for KZAR Channel 249C1, Facility ID No. 25588, licensed to McQueeney, Texas. McCoy has obtained written permission to retransmit KZAR from Educational Media Foundation, licensee of KZAR. Exhibit 10 is a map which shows compliance with FCC Section 74.1201(g) by demonstrating that the proposed K300CM FCC F(50,50) 60 dBu contour is contained inside the licensed KZAR FCC F(50,50) 60 dBu contour.

Exhibit 13-A is a channel study using Section 73.207 separation distances for Class A FM stations. This channel study is provided as a courtesy to Commission staff to help identify potential contour overlap with other FM facilities.

Exhibit 13-B shows compliance with Co-Channel station KAJA Channel 247C0, San Antonio, TX.

Exhibit 13-C shows there is no prohibited interference created to third adjacent station KHFI-FM, Channel 244C1, Georgetown, TX.

Exhibit 13-D shows compliance with Section 74.1233(a) (Common Overlap). The FCC F(50,50) 60 dBu contours of the K300CM construction permit and the proposed modification overlap.

Although there is predicted interference to primary station KZAR, Channel 249C1, McQueeney, TX in a small area and population, the interference does not occur in or near McQueeney, TX, the city of license of primary station KZAR. Such interference is permissible under Section 74.1204(e) for a translator operating on a first, second or third adjacent channel to the primary station.

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