

Exhibit 12 – ENGINEERING REPORT

Response to “250-mile Window Application” for
Family Life Broadcasting System to Move
W291CR (Facility ID No. 142079) to Troy, Michigan as AM Fill-In Translator
On Channel 276 (103.1 MHz), 0.25 kW ERP
For WUFL (AM) Domestic Station Class D Facility ID 20629

In response to the first filing window to relocate a Class D FM translator station within the non-reserved FM band up to 250 miles to rebroadcast its Domestic Class D WUFL (Facility ID No. 20629), Sterling Heights Michigan AM station, Family Life Broadcasting System (“FLBS”), licensee of WUFL respectfully requests a Construction Permit to relocate its W291CR (Facility ID No. 142079) Construction Permit from Benton Harbor Michigan to a tower site near Troy, Michigan on Channel 276 (103.1 MHz) at 0.25 kW ERP. **Exhibit 1.1** shows the distance from the current W291CR Construction Permit coordinates are 175 miles from the coordinates of the Proposed modified AM fill-in translator Facility, well within the 250-mile limit.

Exhibit 10 shows the 60-dBu f[50,50] contour of the Proposed modified AM fill-in facility is within the WUFL(AM) 2.0 mV/m contour as well as a 40 km radius centered at the WUFL(AM) transmitter site.

Exhibit 13.1 is a CH276D Allocation of Allotments demonstrating that the modified translator facility will not cause interference to any full-service U.S. station, translator, or LPFM application or station with the possible exception of 2nd adjacent WPZR, Mount Clemens MI, 2nd adjacent WMUZ, Detroit MI and Canadian station CBEF1F.

Exhibit 13.2 is a waiver request of § 74.1204(d) and shows that WPZR and WMUZ are fully protected as the calculated interference area will not reach the ground nor a 7-meter artificial plane representing a two-story building when taking into account the downward radiation characteristics of the transmitting antenna.

Exhibit 13.3 shows the modified Facility’s contour protection toward WQUS (FM), Lapeer, MI and includes an FMOver Analysis.

Exhibit 13.4 shows that the proposed interference caused toward CBEF1F is only over U.S. territory, making it compliant with U.S. – Canadian agreement(s).

Exhibit 13.5 shows the modified Facility’s contour protection toward WWWW-FM, Ann Arbor, MI and includes an FMOver Analysis.

Exhibit 13.6 shows compliance with Section 4.3 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 as well as § 74.1235(d)(3).

Exhibit 17.1 is a study that shows the Proposed modified facility complies with the Commission’s environmental and RF exposure guidelines.

All other necessary documentation used to certify the technical portion of the FCC Form 349 is available to the Commission upon request. The USGS 03 Second terrain data was utilized in the preparation of the exhibits.