

## **Exhibit 12**

Modify W226CH FM Translator Station  
Proposed CH 226D – 93.1 MHz – 0.175 kW  
Carthage, Illinois  
August 6, 2018

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Virden Broadcasting Corporation, (“VBC”), licensee of FM translator station W226CH, Channel 226D, Facility ID No. 140186, McComb, IL. VBC herein proposes to modify W226CH by filing a Form 349 minor modification application. The application proposes changing to a new transmitter location and operating with a directional antenna. The community to which the proposed facility would serve is being changed from McComb, IL to Carthage, IL. The proposed W226CH facility would operate with 175 watts vertical polarization at 36 meters height above ground and 45 meters HAAT. The modified W226CH will be continue to be used as a fill-in translator for AM primary station WYEC, 1510 kHz, Facility ID No. 60017, licensed to McComb, IL. VBC is also the licensee of WYEC.

Exhibit 10 shows compliance with Section 74.1201(g) Fill-In Translator. The proposed W226CH FCC F(50,50) 60 dBu contour is contained inside a 25 mile radius from AM primary station WYEC.

Exhibit 13-A is a channel study using Section 73.207 spacing distances for Class A FM stations. This study is provided as a convenience to help identify stations that could potentially receive interference from the proposed W226CH modification.

Exhibit 13-B demonstrates compliance with Section 74.1204 contour protection to first adjacent full power FM station KGRC Channel 225C1, Hannibal, MO.

Exhibit 13-C shows compliance with Section 74.1204 contour protection with first adjacent FM translator CP BNPFT-20180508ACW for K227DO, Channel 227D, Keokuk, IA.

The proposed W226CH does not meet the criteria of Section 74.1233(a) - Common Overlap. Therefore VBC respectfully requests a waiver of Section 74.1233(a) per a "Mattoon Waiver"<sup>1</sup> because the proposed modification appears to meet the criteria for such a waiver. First, the licensee does not have a history of filing serial minor modification applications. W226CH has operated from its current location since beginning operation as a new facility on December 22, 2016. Second, the proposed W226CH facility is mutually exclusive with the existing W226CH facility. Third, the proposal would represent an efficient use of spectrum in the public interest because the proposed primary station for W226CH, WYEC is an AM station. Exhibit 13-D demonstrates mutual exclusivity in that the licensed W226CH FCC F(50,10) 40 dBu contour overlaps the proposed W226CH FCC F(50,50) 60 dBu contour.

A study has been undertaken to show the proposed W226CH facility is in compliance with the Commission's radio frequency emission limits and environmental policies and is attached as Exhibits 17-A and 17-B.

<sup>1</sup> *John Garziglia, Esq.*, 26 FCC Rcd 12685 (2011) ("*Garziglia*")