

## **EXHIBIT 12**

**Modify Translator Application BNPFT-20130829AHY  
CH 232D 94.3 MHz – 0.19 kW ERP New Braunfels, TX  
to  
Proposed CH 234D – 94.7 MHz – 0.25 kW ERP - Marion, TX**

**December 6, 2013**

### **TECHNICAL NARRATIVE**

This Technical Narrative and attached exhibits were prepared on behalf of Frank G McCoy ("McCoy"), applicant for FM translator application BNPFT-20130829AHY, Facility ID No. 142569, Channel 232D, Marion, Texas.

McCoy herein proposes to modify the existing BNPFT-20130829AHY application by relocating to an existing tower site changing the frequency to Channel 234 (94.7 MHz) and operating with 250 watts ERP with directional antenna. The proposed facility will operate on Channel 234D (94.7 MHz) with 250 watts ERP at 66 meters height above average terrain. The modified BNPFT-20130829AHY will be used as a fill-in translator for KZAR Channel 249C1, Facility ID No. 25588, licensed to McQueeney, Texas. McCoy has obtained permission to retransmit KAZR 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 modified BNPFT-20130829AHY 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 contour protection to KAMX, Channel 234C0, Luling, TX.

The BNPFT-20130829AHY FCC F(50,10) 40 dBu contour does not overlap with the KAMX FCC F(50,50) 60 dBu contour.

Exhibit 13-C shows contour protection to KEMA, Channel 233C2, Three Rivers, TX.

The BNPFT-20130829AHY FCC F(50,10) 54 dBu contour does not overlap with the KEMA FCC F(50,50) 60 dBu contour.

Exhibit 13-D shows contour protection to KGSX, Channel 236C1, Comfort, TX.

The BNPFT-20130829AHY FCC F(50,10) 100 dBu contour does not overlap with the KGSX FCC F(50,50) 60 dBu contour.

Exhibit 13-E shows compliance with Section 74.1233(a) (Common Overlap). The FCC F(50,50) 60 dBu contours of the current on-file application and the proposed amendment overlap.

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.