

EXHIBIT 12
TECHNICAL STATEMENT
K262CD COLORADO SPRINGS, COLORADO 239D
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
JANUARY 2016

This Technical Statement is in support of a minor change application, FCC form 349, to FM translator K262CD, facility ID 71817, being filed on behalf of Mountain Community Translators, LLC.

This is a 250-mile window application and the applicant, Mountain Community Translators, LLC, has an agreement with United States CP, LLC, the licensee of KCBR(AM), to rebroadcast KCBR(AM) on K262CD. Mountain Community Translators, LLC is proposing to change sites to the KCBR tower site. The Effective Radiated Power will be 99 Watts and the antenna will be mounted at 97 meters Above Ground Level with a Center of Radiation at 1908 meters Above Mean Sea Level.

Figure 1 shows a channel interference study conducted from the proposed site for the proposed translator. The only pertinent records for further study are:

- 1) KATC-FM Colorado Springs, Colorado 236C License
- 2) KIBT Fountain, Colorado 241C2 License
- 3) KPTT Denver, Colorado 239C0 License

The proposed site is located within the protected contours of 3rd adjacent licensed station KATC-FM Colorado Springs, Colorado on channel 236C and 2nd adjacent licensed station KIBT Fountain, Colorado on channel 241C2. The predicted F(50-50) field strength of KATC-FM and KIBT at the proposed transmitter site are 103.4 and 81.2 dB ϵ , respectively. The lower field strength from these two stations will result in a larger predicted interfering contour by the proposed facility. Therefore, the worst-case predicted interfering contour F(50-10) generated by the proposed facility to KIBT is an additional 40

dB ϵ at 121.2 dB ϵ . The maximum distance to this 121.2 dB ϵ interfering contour is 60.5 meters from the transmitter. Because the proposed transmitter will be 97 Above Ground Level, the interfering contour will not reach within 36 meters from the ground. There are no structures of greater than 36 meters, just greater than 118 feet, near the tower.

The applicant, Mountain Community Translators, LLC, respectfully requests a waiver of C.F.R. 74.1204(d) of the Commission's rules based on the fact that there is no population within the area of predicted interference.

Figure 2 is a predicted coverage map showing the 40 dB ϵ interference contour F(50,10) of the proposed operation and the 60 dB ϵ protected contour F(50,50) of KPTT Denver, Colorado on channel 239C0. As can be seen, there is no prohibited overlap between these two contours.

The distance between the proposed site and the previous authorized CP for K262CD is less than 101 miles and meets the requirements for a 250-mile window application.

The proposed operation of K262CD on channel 239D will operate as a fill-in translator for KCBR(AM), 1040 kHz, Monument, Colorado. Figure 3 shows that the 60 dB ϵ contour of the proposed operation of K262CD is entirely within the KCBR 2 mV/m contour and within 25 miles of the KCBR transmitter site.

KCBR(AM) will make impedance measurements before and after the installation of the antenna for K262CD.

It was concluded that the proposed operation of K262CD Colorado Springs, Colorado on channel 239D will not cause any harmful interference to any existing stations and will be in full compliance with the Commission's rules. Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.