

EXHIBIT 12
TECHNICAL STATEMENT
K280FU COLORADO SPRINGS, COLORADO 294D
MOUNTAIN COMMUNITY TRANSLATORS, LLC
FCC FORM 349
JULY 2016

This Technical Statement is in support of a minor modification, FCC form 349, to FM translator K280FU, facility ID 158405, 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 Timothy C. Cutforth, the licensee of KJME(AM), to rebroadcast KJME(AM) on K280FU.

Mountain Community Translators, LLC is proposing to change channels to channel 294D and sites to ASR 1025253 using a Nicom BKG77 directional antenna at an Effective Radiated Power of 40 Watts. The directional antenna will be mounted at 93 meters Above Ground Level with a Center of Radiation at 1904 meters Above Mean Sea Level.

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

- 1) KBPI Denver, Colorado 294C0 License
- 2) KKLI Widefield, Colorado 292C2 License
- 3) KLCX Pueblo, Colorado 295C1 License
- 4) K297BQ Colorado Springs, Colorado 297D CP

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 KBPI Denver, Colorado on channel 294C0. As can be seen, there is no prohibited overlap between these two contours.

Figures 3 and 4 are predicted coverage maps 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

KLCX Pueblo, Colorado on channel 295C1. (Figure 4 is a magnification of Figure 3.) As can be seen, there is no prohibited overlap between these two contours.

The proposed site is located within the protected 60 dB ϵ contours of 2nd adjacent station KCLI Widefield, Colorado on channel 292C2 and with a CP for K297BQ Colorado Springs, Colorado on channel 297D. The signal strength at the proposed site of K280FU for KCLI is 86.7 dBu and for the CP for K297BQ is 75.8 dBu. The maximum distance from the transmitter to the edge of either interference zone is 71.8 meters. Because the transmitter is mounted 93 meters above ground, the interference zone will not reach within 21 meters of the ground. Therefore, there is no population in the interference zone.

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 5 is the antenna pattern.

The distance between the proposed site and the previous authorized site for K280FU is 82 miles and meets the requirements for a 250-mile window application.

The proposed operation of K280FU will operate as a fill-in translator rebroadcasting KJME(AM) Fountain, Colorado, facility ID #135885. Figure 6 shows that the 60 dB ϵ contour of the proposed operation of K280FU is entirely within the KJME(AM) 2 mV/m contour and within 25 miles of the KJME(AM) transmitter site.

It was concluded that the proposed operation of K280FU in Colorado Springs, Colorado on 294D 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.