

EXHIBIT 12

This narrative exhibit is submitted to demonstrate that the instant proposal fully complies with the interference criteria set forth in Section 74.1204 of the Commission's rules. Attached at exhibit 13 are a spacing study, an additional narrative exhibit, a chart, and maps demonstrating clearly that there is no prohibited overlap between this proposal and any other FM services. The attached FM spacing study demonstrates that this proposal would be fully spaced even as a full power Class A FM station to all but four other FM facilities. One currently operating and one proposed FM translators have also been included on the maps because of their proximity to the proposed facilities. The attached maps demonstrate that there is no prohibited contour overlap between these six facilities and the instant proposed FM translator facilities. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The six facilities that have been included on the attached maps are: WKRZ, 98.5, Freeland, PA (54 dBu contour to proposed 94 dBu interference contour); WAAL, 99.1, Binghamton, NY (54 dBu contour to prop. 48 dBu int. contour); WUSR, 99.5, Scranton, PA (60 dBu contour to prop. 100 dBu int. contour); WUSL, 98.9, Philadelphia, PA (54 dBu contour to prop. 34 dBu int. contour); 20030314BXXZ, 98.9, Port Jervis, NY (60 dBu contour to prop. 40 dBu int. contour and 40 dBu int. contour to prop. 60 dBu contour); and W255BL, 98.9, Bloomsburg, PA (60 dBu contour to prop. 40 dBu int. contour). The final attachments to this exhibit are a 74.1204(d) study with regard to overlap between this proposal and the coverage contours of WKRZ, Freeland, PA and WUSR, Scranton, PA. A scale of kilometers has been included on the maps. These maps were drawn to scale using the rfSoftware series of computer programs.

By: Kevin Fitzgerald, Chief Engineer