

## 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 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. The attached maps demonstrate that there is no prohibited contour overlap between these stations and the instant proposed FM translator facilities. One currently operating FM station, one currently operating FM translator, and two proposed FM translators have also been included on the maps because of their proximity to the proposed facilities. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The eight facilities that have been included on the attached maps are: WISX, 106.1, Philadelphia, PA (54 dBu contour to proposed 48 dBu interference contour); WMGH-FM, 105.5, Tamaqua, PA (60 dBu contour to prop. 100 dBu int. contour); WQXR-FM, 105.9, Newark, NJ (57 dBu contour to prop. 37 dBu int. contour); WPZX, 105.9, Pocono Pines, PA (60 dBu contour to prop. 40 dBu int. contour); WFYY, 106.5, Bloomsburg, PA (54 dBu contour to prop. 94 dBu int. contour); New, 106.3, Lehigh Township, PA (60 dBu contour to prop. 100 dBu int. contour); New, 106.3, Kutztown, PA (60 dBu contour to prop. 100 dBu int. contour); and W289AH, 105.7, Bethlehem, PA (60 dBu contour to prop. 54 dBu int. contour). A map with a Blown Up scale has been included to show the spacing between this proposal and WPZX, Pocono Pines, PA; WMGH-FM, Tamaqua, PA; WFYY, Bloomsburg,

PA; and New, 106.3, Lehigh Township, 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