

## EXHIBIT 12

This narrative exhibit is submitted to demonstrate that this 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 which includes a Section 74.1204(d) showing, 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 FM translator has also been included on the maps because of its proximity to the proposed facilities. The attached maps and Section 74.1204(d) study with regard to overlap between this proposal and the coverage contours of WPEL-FM, Montrose, PA and WBHD, Olyphant, PA, demonstrate that there is no prohibited contour overlap between these five stations and the instant proposed FM translator facilities. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The five facilities that have been included on the attached maps are: WCTO, 96.1, Easton, PA (54 dBu contour to proposed 34 dBu interference contour); WBHD, 95.7, Olyphant, PA (60 dBu contour to prop. 100 dBu int. contour); WPEL-FM, 96.5, Montrose, PA (54 dBu contour to prop. 94 dBu int. contour); WGGI, 95.9, Benton, PA (60 dBu contour to prop. 54 dBu int. contour); and W241BB, 96.1, Wilkes-Barre, PA (60 dBu contour to prop. 40 dBu int. contour).

W241AZ 96.1 Scranton, PA 74.1204(d) Narrative and its related exhibits are included to show allowable overlap under Section 74.1204(d) with this proposal's 94 dBu and 100 dBu interference contours and the 54 dBu and 60 dBu coverage contours of WPEL-FM,

Montrose, PA and WBHD, Olyphant, 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, Director of Engineering