

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 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 six other FM facilities. The attached maps and Section 74.1204(d) study with regard to overlap between this proposal and the coverage contours of WBSX, Hazleton, PA and WBHT, Mountain Top, PA demonstrate that there is no prohibited contour overlap between these six facilities and the instant proposed FM translator facilities. One FM translator has also been included on the maps because of its proximity to the proposed facilities. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The seven facilities that have been included on the attached maps are: WPEN, 97.5, Burlington, NJ (54 dBu contours to proposed 34 dBu interference contour); WBSX, 97.9, Hazleton, PA (54 dBu contour to prop. 94 dBu int. contour); WTBD-FM, 97.5, Delhi, NY (60 dBu contours to prop. 40 dBu int. contour); WBHT, 97.1, Mountain Top, PA (60 dBu contour to prop. 100 dBu int. contour); 20131112BJE (New LPFM), 97.5, Wilkes-Barre, PA, (60 dBu contour to prop. 40 dBu int. contour); WAMS-LP, 97.5, Newton, NJ (60 dBu contour to prop. 40 dBu int. contour), and W246DC, 97.5, Mehoopany, PA (60 dBu contour to prop. 40 dBu int. contour). W248BP 97.5 Dickson City, PA 74.1204(d) Narrative and its related maps are included to show allowable overlap under Section 74.1204(d) with this

proposal's 100.6 dBu interference contour and the 60.6 dBu coverage contours of WBHT, Mountain Top, PA and WBSX, Hazleton, 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