

## 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 demonstrate that there is no prohibited contour overlap between these six facilities and the instant proposed FM translator facilities. Two FM translators have also been included on the maps because of their 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 seven stations and the instant proposed FM translator 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: WCTO, 96.1, Easton, PA (54 dBu contour to proposed 34 dBu interference 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); WSOX, 96.1, Red Lion, PA (54 dBu contour to prop. 34 dBu int. contour); WPHD, 96.1, South Waverly, PA (60 dBu contour to prop. 40 dBu int. contour); WBHD, 95.7, Olyphant, PA (60 dBu contour to prop. 100 dBu int. contour); W241AZ, 96.1, Clarks Summit, PA (60 dBu contour to prop. 40 dBu int. contour); and W241AM, 96.1, Waymart, PA (60 dBu contour to prop. 40 dBu int. contour). W241BB

Wilkes-Barre Bunker Interference Blown Up 1 and 2 are maps that more clearly show that no overlap occurs to any other broadcast facilities including WCTO and W241AZ. 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