

EXHIBIT 12
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FM AND FM TRANSLATOR
STATION PROTECTION
Positive Alternative Radio, Inc.
Martinsville, VA

Figure 12.0 depicts the interfering contours for the proposed W209BQ Channel 263 operating facilities in relation to the protected contours for all FM broadcast, FM translator, and Low Power FM stations operating on Channels 260 through 266 requiring protection consideration.¹ As shown in this figure, these proposed operating facilities fail to provide the contour protection required by Section 74.1204(a) of the FCC Rules to WZBB(FM) - Stanleyville, Virginia, which operates on Channel 260C3. As is documented below in more detail, however, the proposed W209BQ Channel 263 operating facilities are not likely to result in any actual interference to WZBB. Thus, based on this lack of interference, Section 74.1204(d) of the FCC Rules permits the attached application to be granted in spite of this prohibited contour overlap.

The proposed W209BQ transmitter site is located within the 60 dBu protected contour for WZBB, which operates on a third adjacent channel. As a result, Section 74.1204(a) of the FCC Rules prohibits any overlap between the proposed W209BQ 100 dBu contour and the 60 dBu protected contour for WZBB. Compliance with this requirement, however, is obviously not possible since, as noted above, the proposed W209BQ site is located within the 60 dBu protected contour for WZBB.

Figure 12.1 is a map exhibit depicting the predicted 100 dBu contour for the proposed W209BQ Channel 263 operating facilities. This contour was projected utilizing

¹Since the proposed effective radiated power is less than 100 watts, pursuant to Section 74.1204(g) of the FCC Rules it is not necessary to consider protection requirements to stations separated in frequency from the proposed facilities by 53 or 54 channels.

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free space propagation prediction techniques and extends to a horizontal distance of 117 meters from the proposed W209BQ site. As shown in this figure, there are buildings and a public highway located within this radius of the proposed site. For this reason, it was necessary to undertake a more detailed analysis to document that there is no population within this area of prohibited overlap.

Table 12.2 and Figure 12.2 present the vertical radiation pattern for the single bay antenna which will be utilized for the proposed W209BQ operating facilities. This vertical radiation pattern data was utilized in conjunction with free space propagation prediction techniques to calculate the distance to the 100 dBu contour for the proposed facilities at depression angles ranging from 0° down through 90°. The results of these calculations are depicted in Figure 12.3, which shows a side view of the predicted 100 dBu contour for this proposed antenna system. As shown in this figure, the predicted 100 dBu contour for these proposed operating facilities never reaches ground level, with its closest approach being 31.7 meters (104 feet) at a depression angle of 47°. Based on this data, there is no prohibited contour overlap at ground level with WZBB. Furthermore, the tallest structures located within 117 meters of the proposed W209BQ transmitter site are two story homes that stand approximately 7.6 meters (25 feet) above ground level. Since the tower on which the proposed W209BQ antenna will be mounted is located at essentially the highest point in this area, it is obvious that the upper floors of these homes do not penetrate the proposed 100 dBu contour. As a result, there is no population within the area of prohibited overlap with WZBB and, therefore, no interference will result to WZBB in a populated area from the proposed W209BQ operating facilities. Thus, pursuant to Section 74.1204(d) of the FCC Rules,

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the attached application can be granted in spite of this prohibited contour overlap, due to the total lack of population within the area of prohibited overlap. If it is deemed to be necessary, a waiver of Section 74.1204(a) of the FCC Rules is respectfully requested with regard to this situation.

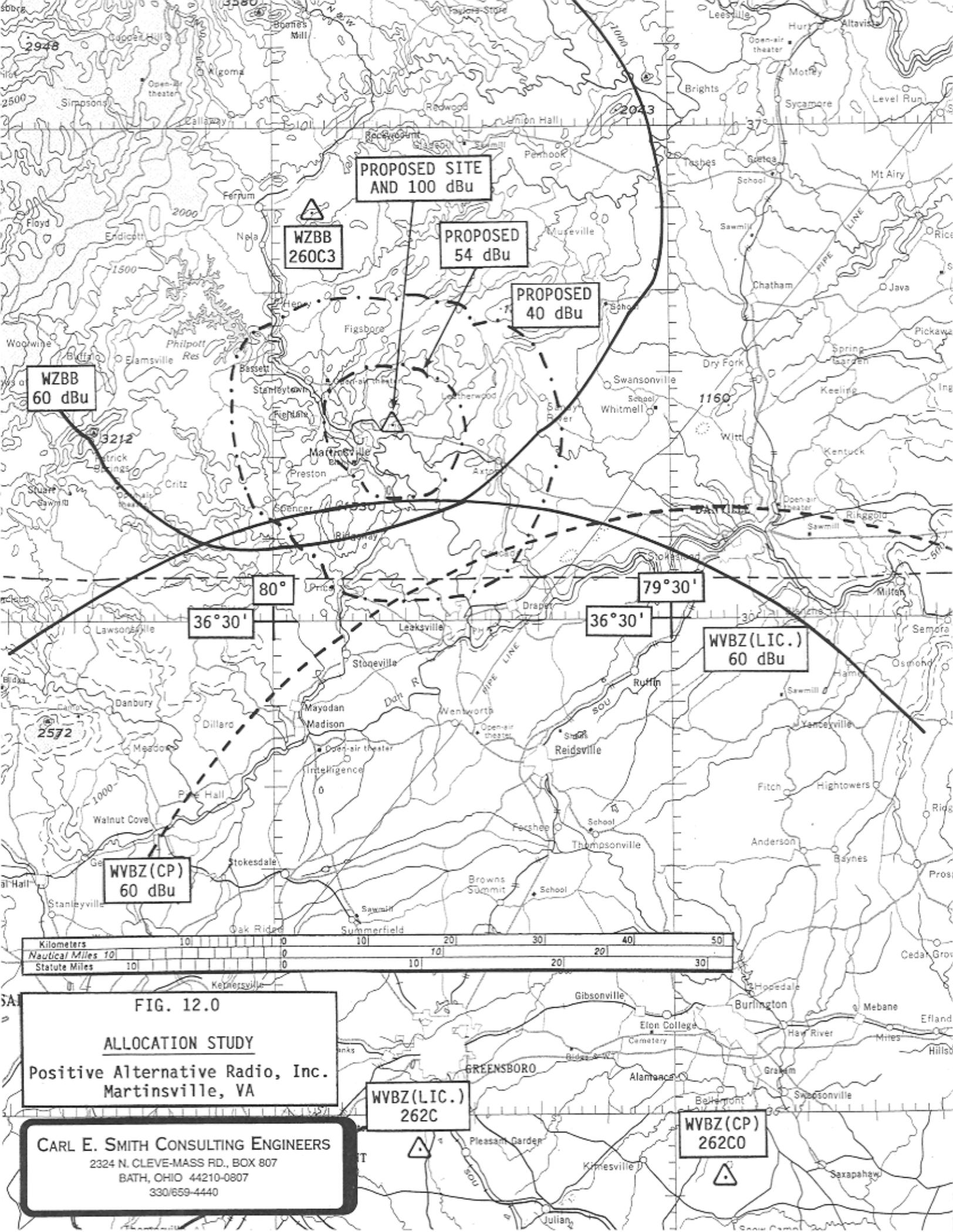


FIG. 12.0

ALLOCATION STUDY

**Positive Alternative Radio, Inc.
Martinsville, VA**

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

**WVZ(LIC.)
262C**

**WVZ(CP)
262C0**

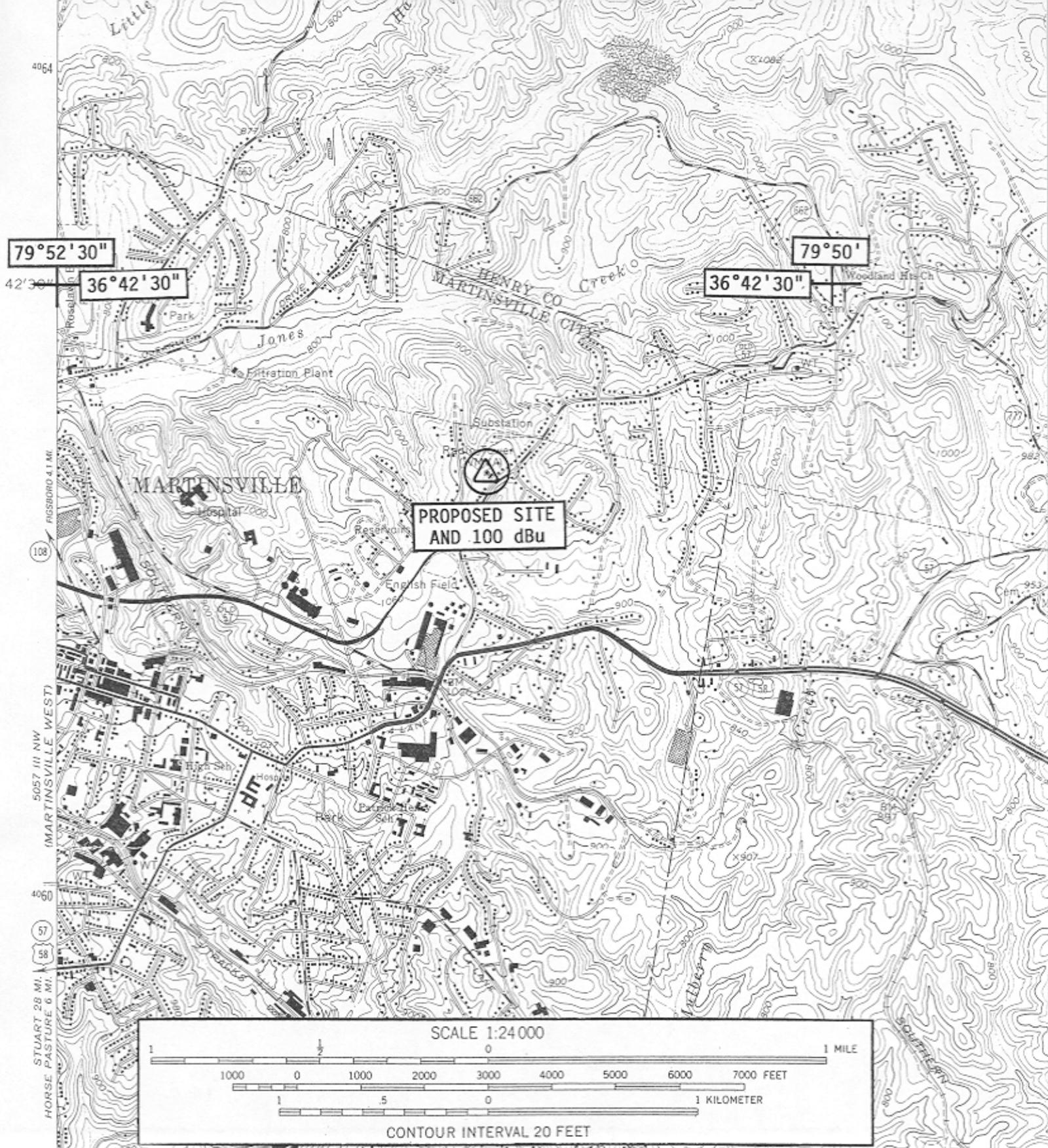


FIG. 12.1

W209BQ PROPOSED
100 dBu CONTOUR

Positive Alternative Radio, Inc.
Martinsville, VA

CARL E. SMITH CONSULTING ENGINEERS
 2324 N. CLEVE-MASS RD., BOX 807
 BATH, OHIO 44210-0807
 330/659-4440

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
3.2	.999 (-0.012)	-4.4	.997 (-0.023)	-12.0	.98 (-0.173)
3.0	.999 (-0.011)	-4.6	.997 (-0.025)	-12.2	.98 (-0.178)
2.8	.999 (-0.009)	-4.8	.997 (-0.027)	-12.4	.979 (-0.184)
2.6	.999 (-0.008)	-5.0	.997 (-0.03)	-12.6	.978 (-0.19)
2.4	.999 (-0.007)	-5.2	.996 (-0.032)	-12.8	.978 (-0.196)
2.2	.999 (-0.006)	-5.4	.996 (-0.035)	-13.0	.977 (-0.203)
2.0	.999 (-0.005)	-5.6	.996 (-0.037)	-13.2	.976 (-0.209)
1.8	1.00 (-0.004)	-5.8	.995 (-0.04)	-13.4	.975 (-0.215)
1.6	1.00 (-0.003)	-6.0	.995 (-0.043)	-13.6	.975 (-0.222)
1.4	1.00 (-0.002)	-6.2	.995 (-0.046)	-13.8	.974 (-0.229)
1.2	1.00 (-0.002)	-6.4	.994 (-0.049)	-14.0	.973 (-0.235)
1.0	1.00 (-0.001)	-6.6	.994 (-0.052)	-14.2	.973 (-0.242)
.8	1.00 (-0.001)	-6.8	.994 (-0.055)	-14.4	.972 (-0.249)
.6	1.00 (0)	-7.0	.993 (-0.058)	-14.6	.971 (-0.256)
.4	1.00 (0)	-7.2	.993 (-0.062)	-14.8	.97 (-0.263)
.2	1.00 (0)	-7.4	.993 (-0.065)	-15.0	.969 (-0.27)
0	1.00 (0)	-7.6	.992 (-0.069)	-15.2	.969 (-0.278)
-.2	1.00 (0)	-7.8	.992 (-0.073)	-15.4	.968 (-0.285)
-.4	1.00 (0)	-8.0	.991 (-0.076)	-15.6	.967 (-0.293)
-.6	1.00 (0)	-8.2	.991 (-0.08)	-15.8	.966 (-0.3)
-.8	1.00 (-0.001)	-8.4	.99 (-0.084)	-16.0	.965 (-0.308)
-1.0	1.00 (-0.001)	-8.6	.99 (-0.088)	-16.2	.964 (-0.316)
-1.2	1.00 (-0.002)	-8.8	.989 (-0.093)	-16.4	.963 (-0.324)
-1.4	1.00 (-0.002)	-9.0	.989 (-0.097)	-16.6	.962 (-0.332)
-1.6	1.00 (-0.003)	-9.2	.988 (-0.101)	-16.8	.962 (-0.34)
-1.8	1.00 (-0.004)	-9.4	.988 (-0.106)	-17.0	.961 (-0.348)
-2.0	.999 (-0.005)	-9.6	.987 (-0.11)	-17.2	.96 (-0.357)
-2.2	.999 (-0.006)	-9.8	.987 (-0.115)	-17.4	.959 (-0.365)
-2.4	.999 (-0.007)	-10.0	.986 (-0.12)	-17.6	.958 (-0.374)
-2.6	.999 (-0.008)	-10.2	.986 (-0.124)	-17.8	.957 (-0.383)
-2.8	.999 (-0.009)	-10.4	.985 (-0.129)	-18.0	.956 (-0.391)
-3.0	.999 (-0.011)	-10.6	.985 (-0.134)	-18.2	.955 (-0.4)
-3.2	.999 (-0.012)	-10.8	.984 (-0.14)	-18.4	.954 (-0.409)
-3.4	.998 (-0.014)	-11.0	.983 (-0.145)	-18.6	.953 (-0.418)
-3.6	.998 (-0.015)	-11.2	.983 (-0.15)	-18.8	.952 (-0.427)
-3.8	.998 (-0.017)	-11.4	.982 (-0.156)	-19.0	.951 (-0.437)
-4.0	.998 (-0.019)	-11.6	.982 (-0.161)	-19.2	.95 (-0.446)
-4.2	.998 (-0.021)	-11.8	.981 (-0.167)	-19.4	.949 (-0.456)

Systems With Reliability Inc.

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CLIENT: CES Engineering, Ron Kauffman
 ANTENNA TYPE: FMEC/1
 FREQUENCY: 98.1
 PATTERN POL.: Circular
 DIRECTIVITY(Peak): 0.883/-0.539 dBd
 DIRECTIVITY(Horiz): 0.883/-0.539 dBd

Date: 10/23/03

Beam Tilt (Deg.): 0
 Null Fill(s)(%): 0, 0, 0

Micro-Tek Eng. Ver. 2.5

TABLE 12.2

VERTICAL RADIATION PATTERN
 PROPOSED W209BQ ANTENNA

Positive Alternative Radio, Inc.
 Martinsville, VA

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
-19.6	.948 (-0.465)	-27.2	.90 (-0.911)	.54.0	.629 (-4.027)
-19.8	.947 (-0.475)	-27.4	.899 (-0.924)	.55.0	.616 (-4.205)
-20.0	.946 (-0.485)	-27.6	.898 (-0.939)	.56.0	.603 (-4.39)
-20.2	.945 (-0.495)	-27.8	.896 (-0.953)	.57.0	.59 (-4.58)
-20.4	.944 (-0.505)	-28.0	.895 (-0.967)	.58.0	.577 (-4.778)
-20.6	.942 (-0.515)	-28.2	.893 (-0.981)	.59.0	.564 (-4.982)
-20.8	.941 (-0.525)	-28.4	.892 (-0.996)	.60.0	.55 (-5.193)
-21.0	.94 (-0.535)	-28.6	.89 (-1.01)	.61.0	.536 (-5.411)
-21.2	.939 (-0.546)	-28.8	.889 (-1.025)	.62.0	.523 (-5.638)
-21.4	.938 (-0.556)	-29.0	.887 (-1.04)	.63.0	.509 (-5.873)
-21.6	.937 (-0.567)	-29.2	.886 (-1.055)	.64.0	.495 (-6.116)
-21.8	.936 (-0.578)	-29.4	.884 (-1.07)	.65.0	.48 (-6.369)
-22.0	.934 (-0.589)	-29.6	.883 (-1.085)	.66.0	.466 (-6.631)
-22.2	.933 (-0.6)	-29.8	.881 (-1.101)	.67.0	.452 (-6.904)
-22.4	.932 (-0.611)	-30.0	.879 (-1.116)	.68.0	.437 (-7.187)
-22.6	.931 (-0.622)	-31.0	.871 (-1.195)	.69.0	.423 (-7.483)
-22.8	.93 (-0.633)	-32.0	.863 (-1.277)	.70.0	.408 (-7.791)
-23.0	.928 (-0.645)	-33.0	.855 (-1.363)	.71.0	.393 (-8.112)
-23.2	.927 (-0.656)	-34.0	.846 (-1.451)	.72.0	.378 (-8.448)
-23.4	.926 (-0.668)	-35.0	.837 (-1.543)	.73.0	.363 (-8.799)
-23.6	.925 (-0.68)	-36.0	.828 (-1.638)	.74.0	.348 (-9.167)
-23.8	.923 (-0.692)	-37.0	.819 (-1.737)	.75.0	.333 (-9.553)
-24.0	.922 (-0.704)	-38.0	.809 (-1.839)	.76.0	.318 (-9.959)
-24.2	.921 (-0.716)	-39.0	.799 (-1.944)	.77.0	.302 (-10.387)
-24.4	.92 (-0.728)	-40.0	.789 (-2.054)	.78.0	.287 (-10.839)
-24.6	.918 (-0.74)	-41.0	.779 (-2.167)	.79.0	.272 (-11.317)
-24.8	.917 (-0.753)	-42.0	.769 (-2.283)	.80.0	.256 (-11.826)
-25.0	.916 (-0.765)	-43.0	.758 (-2.404)	.81.0	.241 (-12.367)
-25.2	.914 (-0.778)	-44.0	.747 (-2.529)	.82.0	.225 (-12.946)
-25.4	.913 (-0.791)	-45.0	.736 (-2.658)	.83.0	.21 (-13.569)
-25.6	.912 (-0.803)	-46.0	.725 (-2.791)	.84.0	.194 (-14.241)
-25.8	.91 (-0.816)	-47.0	.714 (-2.928)	.85.0	.178 (-14.97)
-26.0	.909 (-0.83)	-48.0	.702 (-3.071)	.86.0	.163 (-15.768)
-26.2	.908 (-0.843)	-49.0	.69 (-3.217)	.87.0	.147 (-16.648)
-26.4	.906 (-0.856)	-50.0	.679 (-3.369)	.88.0	.131 (-17.627)
-26.6	.905 (-0.87)	-51.0	.666 (-3.525)	.89.0	.116 (-18.733)
-26.8	.903 (-0.883)	-52.0	.654 (-3.687)	.90.0	.10 (-20)
-27.0	.902 (-0.897)	-53.0	.642 (-3.854)	.90.0	.00 (-50)

Systems With Reliability Inc.

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CLIENT: CES Engineering, Ron Kauffman
 ANTENNA TYPE: FMEC/1
 FREQUENCY: 98.1
 PATTERN POL.: Circular
 DIRECTIVITY(Peak): 0.883/-0.539 dBd
 DIRECTIVITY(Horiz): 0.883/-0.539 dBd

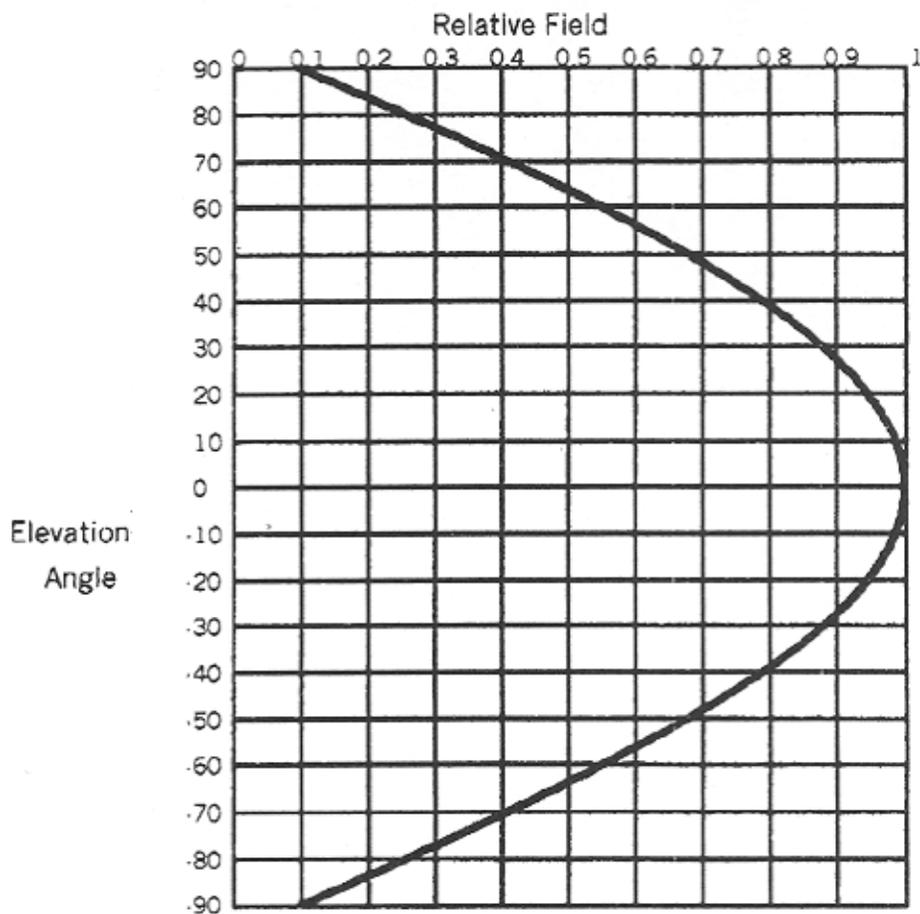
Date: 10/23/03

Beam Tilt (Deg.): 0
 Null Fill(s)(%): 0, 0, 0

Micro-Tek Eng. Ver. 2.5

TABLE 12.2 (Cont'd)

TOTAL P.84



Elevation Pattern

Scale: Linear

Units: Field, Relative

Systems With Reliability Inc.

CLIENT: CES Engineering, Ron Kauffman

Date: 10/23/03

ANTENNA TYPE: FMEC/1

FREQUENCY: 98.1

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/-0.539 dBd

Beam Tilt (Deg.): 0

DIRECTIVITY(Horiz): 0.883/-0.539 dBd

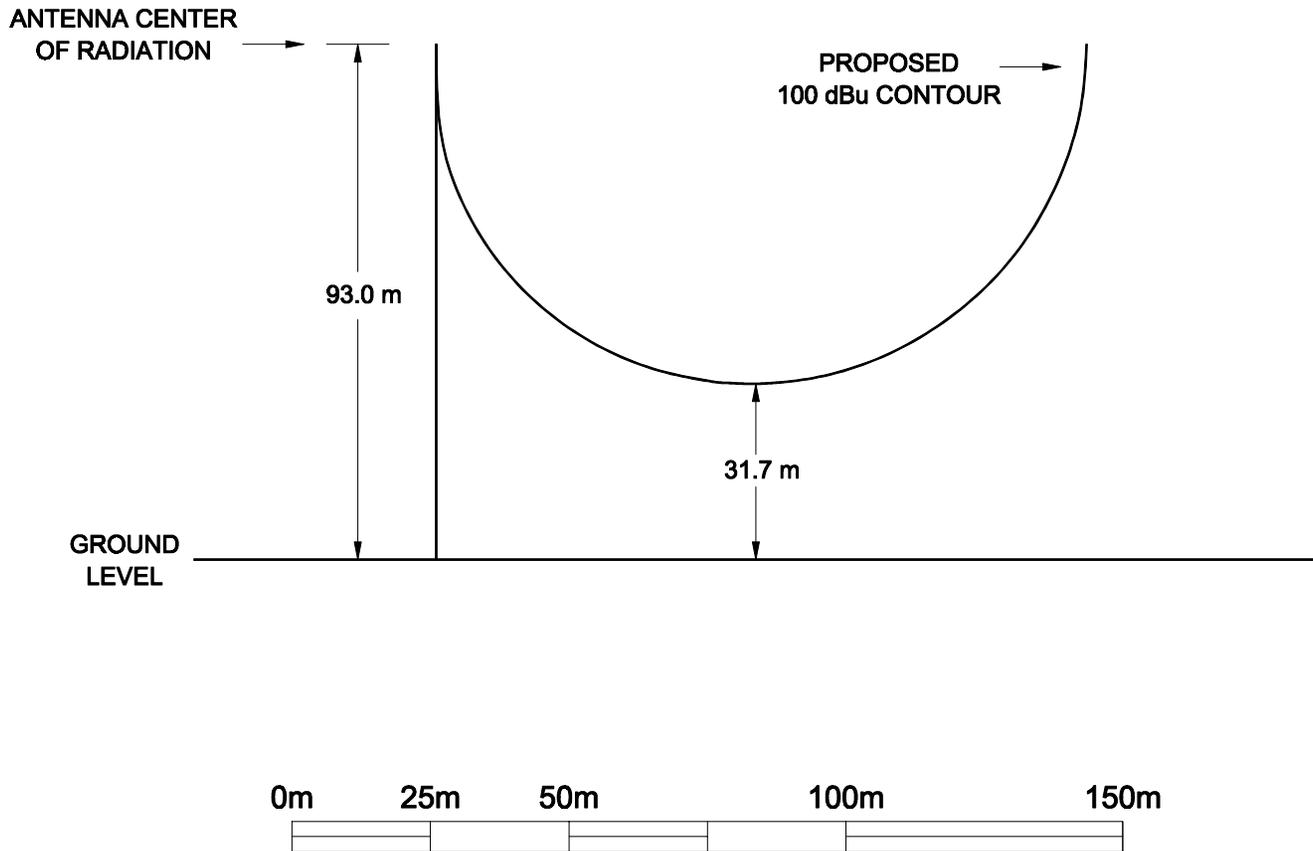
Null Fill(s)(%): 0, 0, 0

Micro-Tek Eng. Ver. 2.5

FIG. 12.2

VERTICAL RADIATION PATTERN
PROPOSED W209BQ ANTENNA

Positive Alternative Radio, Inc.
Martinsville, VA



CARL E. SMITH CONSULTING ENGINEERS
 2324 N. CLEVE-MASS RD., BOX 807
 BATH, OHIO 44210-0807
 (330) 659-4440

FIG. 12.3
 W209BQ PROPOSED
 100 dBu CONTOUR
 POSITIVE ALTERNATIVE RADIO, INC.
 MARTINSVILLE, VA