

EXHIBIT 12  
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OVERLAP REQUIREMENTS

University of Massachusetts  
Pittsfield, MA

Figure 12.0 is an allocation study showing the interfering contours for the proposed facilities in relation to the protected contours for all FM broadcast, FM translator, and Low Power FM stations which require protection consideration. As can be seen from this figure, no overlap will occur between the protected contour for each of these stations and the respective interfering contour for the proposed facilities. Based upon this information, the proposed facilities will provide the required protection to all stations requiring consideration.

It should be noted that the proposed facilities will operate with an effective radiated power of 10 watts. As a result, pursuant to Section 73.1204(g) of the FCC Rules, it is not necessary to demonstrate compliance with the intermediate frequency separation requirements outlined in Section 73.207 of the FCC Rules.

The proposed transmitter site lies within 320 kilometers of the common border between the United States and Canada. At its farthest point, the proposed 34 dBu contour will extend 49.0 kilometers from the proposed site. Since this distance is less than 60 kilometers and the proposed facilities will operate at a power level that is less than 250 watts, the proposed facilities will fully comply with Section 4.3 of the Working Arrangement for Allotment and Assignment of FM Broadcasting Channels 201-300 Under the Canadian-U.S.A FM Broadcasting Agreement of 1947.



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**FIG. 12.0**  
**ALLOCATION STUDY**  
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