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 four 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 four 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 five 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); 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); and W248CJ, 97.5, Mehoopany, PA (60 dBu contour to prop. 40 dBu int. contour). With regard to the short spacing under 74.1204(d), a related desired to undesired map is included to show allowable of overlap under Section 74.1204(d) with this proposal's 155 dBu interference contour and the 115 dBu coverage contours of WBHT, Mountain Top, PA and WBSX, Hazleton, PA.

The 155 dBu contour is only 1.1 meters from the antenna thus the entire interference contour

is contained above ground on the tower. A scale of kilometers has been included on the

maps. These maps were drawn to scale using the rfSoftware series of computer programs.

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