

Exhibit 12

Interference Analysis Overlap Requirements

According to CFR 47 §74.1204(a), translators are required to protect all authorized FM facilities from interference due to overlap of the protected contours of the authorized facilities with the interfering contours of the new translators.

US Facilities

In the attached tabular printout, only KJKK and KPLX have outgoing contour overlaps from the proposed translator, so no interference to other stations is anticipated. Incoming overlap is not prohibited.

Translator applications 636217 and 629500, which are not ‘authorized’ (they have never been accepted for filing) are nevertheless protected from both incoming and outgoing interference, as demonstrated in the maps. However, both have been dismissed in recent days.

KJKK and KPLX are both second adjacent to the proposed translator, and, according to §74.1204(d),

“The provisions of this section concerning prohibited overlap will not apply where the area of such overlap lies entirely over water. In addition, an application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to ... lack of population”

The F(50,50) signal from KJKK at the transmit site of the translator is 85.76 dBu. The F(50,50) signal from KPLX at the transmit site of the translator is 84.76 dBu. The weaker and thus more fragile station is KPLX, so protection sufficient for it will suffice for the other. A 40 dB ratio of undesired to desired signal strength gives an allowable interfering F(50,10) field strength of 124.76 dBu.

Thus for the specified ERP, this contour will only extend 64.1 meters from the antenna. The antenna is proposed for 123 meters AGL. The interfering contour clearly does not reach down to the ground. Hence §74.1204(d) quoted above applies (no population), and the predicted area of interference is acceptable to the Commission.

IF Separation

The proposal is fully spaced from all IF facilities (note KNON is clear by 9.98 km).