

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 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. One FM Translator has also been included on these maps. 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: WLLW, 101.7, Geneva, NY (60 dBu contour to proposed 40 dBu interfering contour); WDKC, 101.5, Covington, PA (60 dBu contour to prop. 54 dBu int. contour); WLTB, 101.7, Johnson City, NY (60 dBu contour to prop. 40 dBu int. contour); WZKZ, 101.9, Alfred, NY (60 dBu contours to prop. 54 dBu int. contour); and W267CJ, 101.3, Horseheads, NY (60 dBu contour to prop. 100 dBu int. contour).

W269BK Big Flats 74.1204(d) Narrative and its related exhibits are included to show allowable overlap under Section 74.1204(d) with this proposal's 100 dBu interference contour and the 60 dBu coverage contours of W267CJ, Horseheads, NY. 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, Chief Engineer