

EXHIBIT 12

This narrative exhibit is submitted to demonstrate that this 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 five other FM facilities. The attached maps demonstrate that there is no prohibited contour overlap between these five facilities and the instant proposed FM translator facilities. Two currently operating FM translators have also been included on the maps because of their proximity to the proposed facilities. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The seven facilities that have been included on the attached maps are: WODE-FM, 99.9, Easton, PA (54 dBu contour to proposed 34 dBu interference contour); WIII, 99.9, Cortland, NY (54 dBu contour to proposed 34 dBu interference contour); WEJL-FM, 100.1, Forest City, PA (60 dBu contour to prop. 54 dBu int. contours); WVRZ, 99.7, Mount Carmel, PA (60 dBu contour to prop. 54 dBu int. contour); WUSR, 99.5, Scranton, PA (60 dBu contour to prop. 100 dBu int. contour); W262AI, 100.3, Forty Fort, PA (60 dBu contour to prop. 100 dBu int. contour) and W261DQ, 100.1, Hazleton, PA (60 dBu contour to prop. 54 dBu int. contour). W260AY 99.9 Glen Lyon, PA 74.1204(d) Narrative is included to show allowable overlap under Section 74.1204(d) with this proposal's 100.6 dBu interference contour and the 60.6 dBu coverage contour of WUSR, Scranton, PA. 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