

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 two other FM facilities. The attached maps and Section 74.1204(d) study with regard to overlap between this proposal and the coverage contour of W254BQ, Olean, NY demonstrate that there is no prohibited contour overlap between these two 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 facility. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The three facilities that have been included on the attached maps are: WDCX-FM, 99.5, Buffalo, NY (54 dBu contour to proposed 48 dBu interference contour); WHMJ, 99.3, Franklin, PA (57 dBu contour to prop. 37 dBu int. contour); and W254BQ, 98.7, Olean, NY (60 dBu contour to prop. 100 dBu int. contour). W257BA 99.3 Rock City, NY 74.1204(d) Narrative and its related maps are included to show allowable overlap under Section 74.1204(d) with this proposal's 100 dBu interference contour and the 60 dBu coverage contour of W254BQ, Olean, NY. Two additional maps with a blown up scale have been included to show that this proposal is fully spaced to WDCX-FM, Buffalo, 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, Technical Consultant