

## EXHIBIT 12

### ENGINEERING STATEMENT

Cram Communications, LLC.

July, 2016

The St. Lawrence University (“SLU”) is the licensee of FM translator station, W206BH, Lyons Falls, NY. SLU also holds construction permit W260CW to modify the facilities of W206BH. This application is a “250-mile Window Application” whereby W206BH (W260CW) is proposing to relocate approximately 57.75 miles (92.94 km.) West-southwest to become an FM translator for WOSW(AM), Fulton, NY (Fac. ID 52370) pursuant to the Commission’s AM revitalization initiative.

It is proposed to modify W206BH to channel 253D, Fulton, NY at the WOSW(AM) transmitter site. Exhibit 10 shows that the proposed 60 dBu contour is fully encompassed by the 2 mv/m daytime contour of Class D station WOSW(AM). The 2 mv/m contour produced by WOSW(AM) (344.4 mv/m @ 1 km.) is approximately 14.0 miles (22.5 km.) This is well within 25-mile limit for FM translators to be utilized for AM stations.

Exhibit 13 demonstrates that the proposed operation will protect all relevant co- and adjacent-channel authorizations and applications. As the Effective Radiated Power proposed is less than 100 watts, I.F. considerations are not necessary.

Stations that are close enough geographically to consider for study are: co-channel station WNYR-FM, Ch. 253A, Waterloo, NY, first adjacent-channel station W252AC, Ch. 252D, Westvale, NY (as well its CP modification), first adjacent-channel station W254CI, Ch. 254D, Camillus, NY, and first adjacent-channel station WLZW, Ch.

254B, Utica, NY. There are no second or third adjacent-channel stations critical for study.

Finally, the 34 dBu (50,10) contour is predicted to stay well within the U.S. land area so no referral to, or concurrence from Canada is required.