

## 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 and one LPFM station have also been included on these maps. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The six facilities that have been included on the attached maps are: WFIZ, 95.5, Odessa, NY (60 dBu contour to proposed 54 dBu interfering contour); WPIG, 95.7, Olean, NY (54 dBu contour to prop. 34 dBu int. contour); WPHD, 96.1, Elmira, NY (60 dBu contour to prop. 100 dBu int. contour); WAQX-FM, 95.7, Manlius, NY (57 dBu contour to prop. 37 dBu int. contour (34 dBu contour shown)); WLDM-LP, 95.7, Sanitaria Springs, NY (60 dBu contours to prop. 40 dBu int. contour); and W239BK, 95.7, Bath, NY (60 dBu contour to prop. 40 dBu int. contour).

W239BQ 95.7 Elmira 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 contour of WPHD, Elmira, 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