

EXHIBIT 12 Engineering statement

The proposed minor changes requested by this application consist of moving the transmitter location 6.3 km and increasing ERP to 65 Watts.

As defined in 74.1233 a) 1) of the Commission's Rules, the proposed move of the transmitter coordinates can be considered a "minor" modification as portions of the 1 mV/m service contours of the approved and proposed facilities overlap, as shown below:

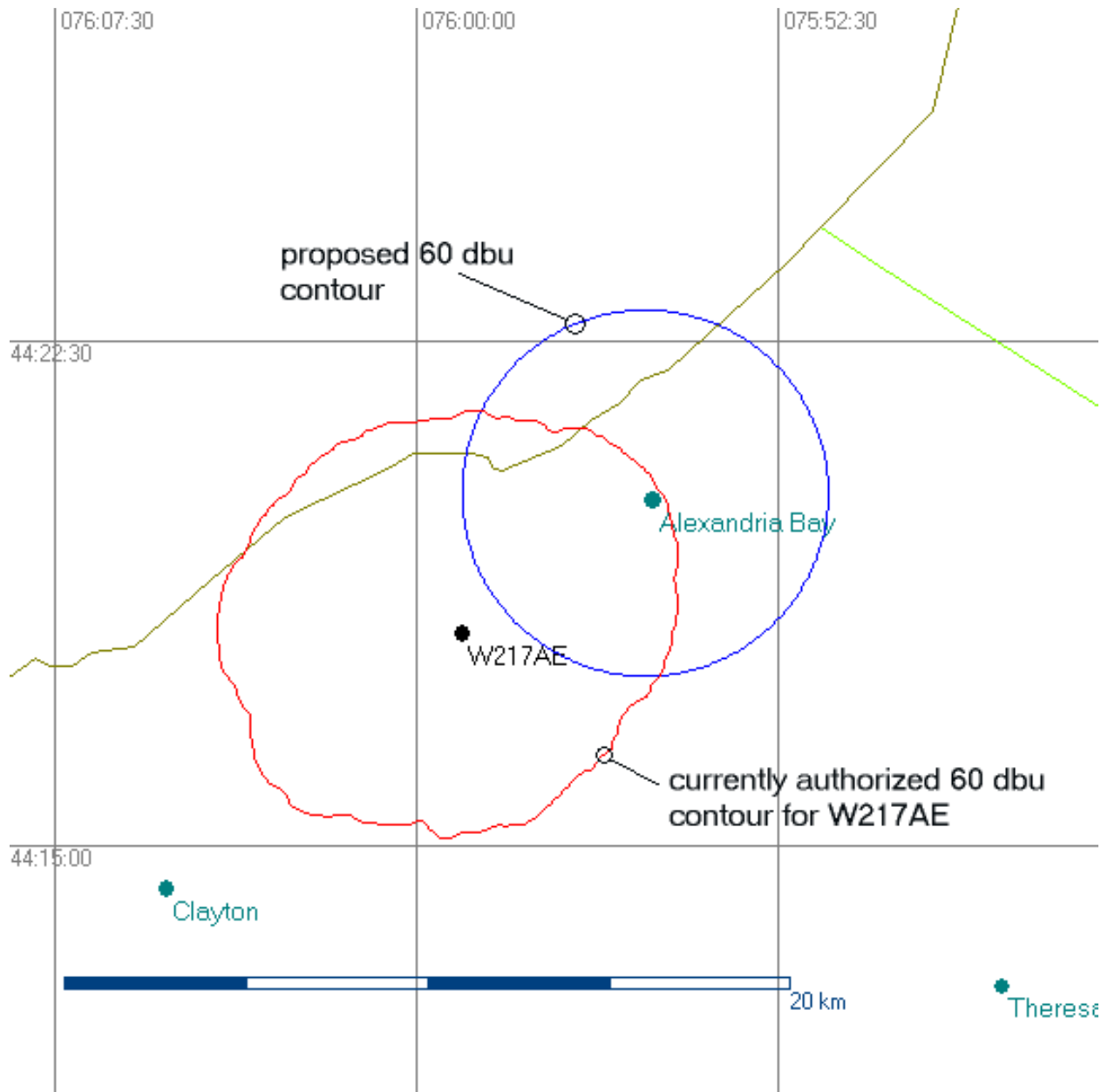


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Per the requirements of 47 C.F.R. Section 74.1234 there will be no contour overlap with any authorized facilities (or new or increased overlap with LP100 stations).

Below is a table which shows the distances to the appropriate contours along various azimuths for the proposal:

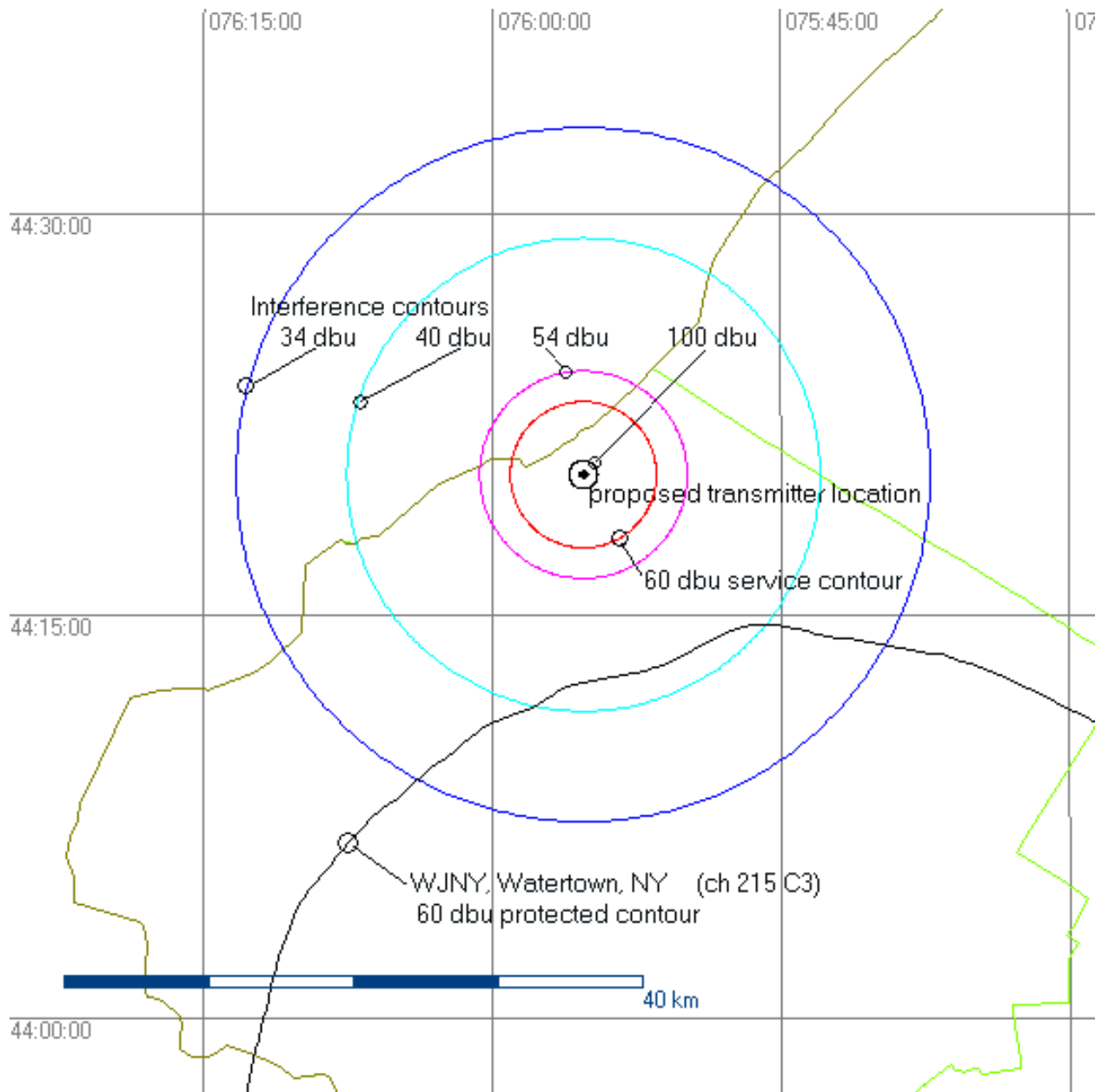
Azimuth deg.	HAAT m.	(protected) f(50,50)	(interference) f(50,10)			
		60 dbu km.	34 dbu	40 dbu	54 dbu	100 dbu
0	11.5	5.0	24.0	16.3	7.1	0.6
30	26.9	5.0	24.0	16.3	7.1	0.6
60	12.5	5.0	24.0	16.3	7.1	0.6
90	5.4	5.0	24.0	16.3	7.1	0.6
120	-10.7	5.0	24.0	16.3	7.1	0.6
150	-17.5	5.0	24.0	16.3	7.1	0.6
180	-11.2	5.0	24.0	16.3	7.1	0.6
210	-0.6	5.0	24.0	16.3	7.1	0.6
240	18.4	5.0	24.0	16.3	7.1	0.6
270	21.9	5.0	24.0	16.3	7.1	0.6
300	6.1	5.0	24.0	16.3	7.1	0.6
330	0.8	5.0	24.0	16.3	7.1	0.6

The following table contains information about the stations near the proposal which potentially require investigation to show non-overlap of protected/interfering contours.

Station	WJNY	WCNY	WTSC
FM channel	215C3	217B	216A
FCC Facility ID:	53729	66284	11719
Location	Watertown, NY	Syracuse, NY	Potsdam, NY
File#	BLED-1986090KC	BLED-19870522KD	BLED-1227
Latitude	43-51-44 N	42-56-42 N	44-39-45 N
Longitude	75-43-40 W	76-01-28 W	75-00-7 W
ERP	7.1 kW	18.5 kW	0.7 kW
HAAT (along connecting radial)	198 m	347 m	67 m
Distance to protected contour	41 km (60 dbu)	73 km (54 dbu)	14 km (60 dbu)
Distance to proposed facilities	55 km	155 km	81 km
For interference to investigated facilities:			
HAAT and bearing to	-15 m	-11 m	-12m
Proposal's interference contour	164°	183°	63°
Distance to proposal's interference contour	0.6 km (100 dbu)	24 km (34 dbu)	7 km (54 dbu)
Clearance between protected and interference contours	13 km	58 km	60 km

EXHIBIT 12 Engineering statement (continued)

The contours from the above table are shown below:



Regarding the potential for interference to channel 6 TV stations, the nearest station is WRGB, Schenectady, NY, which is 245 km from the proposed FM translator location. This is well past the 133 km threshold for considering interference to ch 6 stations from FM translators on channel 217.