

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 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. The attached maps demonstrate that there is no prohibited contour overlap between these four 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 facilities. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The five facilities that have been included on the attached maps are: WECW, 107.7, Elmira, NY (60 dBu contour to proposed 40 dBu interference contour); WLKK, 107.7, Wethersfield Township, NY (54 dBu contour to prop. 34 dBu int. contour); WLRG-LP, 107.5, Corning, NY (60 dBu contour to prop. 54 dBu int. contour); WWHT, 107.9, Syracuse, NY (54 dBu contour to prop. 48 dBu int. contour); and W299BI, 107.7, Ithaca, NY (60 dBu contour to prop. 40 dBu int. contour). Included additionally is a Contour Study Blown Up to show lack of prohibited overlap between this proposal and WECW, 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.

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