

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 stations and the instant proposed FM translator facilities. Four currently operating FM translators and one operating FM station have also been included on the maps because of their proximity to the proposed facilities. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The nine facilities that have been included on the attached maps are: WNBT-FM, 104.5, Wellsboro, PA (54 dBu contour to proposed 48 dBu interference contour); WAEB-FM, 104.1, Allentown, PA (54 dBu contour to prop. 48 dBu int. contour); WWYL, 104.1, Chenango Bridge, NY (60 dBu contour to prop. 54 dBu int. contour); WWRR, 104.9, Scranton, PA (60 dBu contours to prop. 100 dBu int. contour); WNKZ, 103.9, Dushore, PA (60 dBu contours to prop. 100 dBu int. contour); W283BJ, 104.5, Wilkes-Barre, PA (60 dBu contour to 54 dBu interference contour); W283AO, 104.5, Carbondale, PA (60 dBu contour to 54 dBu interference contour); W282BJ, 104.3, Scranton, PA (60 dBu contour to prop. 40 dBu int. contour); and W282BF, 104.3, Honesdale, PA (60 dBu contour to prop. 40 dBu int. contour). 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