

EXHIBIT 11

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 12 are a spacing study, an additional narrative exhibit which includes a Section 74.1204(d) showing, 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 and Section 74.1204(d) study with regard to overlap between this proposal and the coverage contours of WCPP, Hershey, PA and WQXA-FM, York, PA demonstrate that there is no prohibited contour overlap between these four facilities and the instant proposed FM translator facilities. Three new proposed FM translators and one granted unbuilt translator Construction Permit 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 eight facilities that have been included on the attached maps are: WLZS, 106.1, Beaver Springs, PA (60 dBu contour to proposed 40 dBu interference contour); WCPP, 106.7, Hershey, PA (54 dBu contour to prop. 94 dBu int. contour); WQXA-FM, 105.7, York, PA (54 dBu contour to prop. 94 dBu int. contour); WJJZ, 106.1, Philadelphia, PA (54 dBu contour to prop. 34 dBu int. contour); Proposed Translator, 106.3, Elizabethtown, PA (60 dBu contour to prop. 54 dBu int. contour); Proposed Translator, 106.3, Hallam, PA (60 dBu contour to prop. 54 dBu int. contour); Proposed Translator, 106.1, Columbia, PA (60 dBu contour to prop. 40 dBu int. contour); and W291AY, 106.1, Gettysburg, PA (60 dBu contour to prop. 40 dBu int. contour). KFITZ 106.1 New Cumberland, PA Interference Analysis,

Blown Up Scale will show more clearly, with a blown up scale, that there is no prohibited overlap between this proposal's 54 dBu and 40 dBu interference contours and the 60 dBu contours of Proposed Translator, 106.3, Elizabethtown, PA and Proposed Translator, 106.1, Columbia, PA. KFITZ 106.1 New Cumberland, PA 74.1204(d) Narrative and its related maps are included to show allowable overlap under Section 74.1204(d) with this proposal's 115 dBu interference contour and the 75 dBu coverage contours of WQXA-FM, York, PA and WCPP, Hershey, PA. 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