

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 three other FM facilities. Three additional Licensed FM Translators have also been included on the map. The attached maps demonstrate that there is no prohibited contour overlap between these stations and the instant proposed FM translator facility. As demonstrated in these maps no prohibited overlap with these stations is predicted.

The facilities that has been included on the attached maps are: WKXZ, 93.9, Norwich, NY (54 dBu contour to proposed 34 dBu interference contour), WQKX, 94.1, Sunbury, PA (54 dBu contour to proposed 48 dBu interference contour), WSJR, 93.7, Dallas, PA (60 dBu contour to proposed 54 dBu interference contour), W229AR, 93.7, Waverly, NY (60 dBu contour to proposed 54 dBu interference contour), W229AQ, 93.7, Mansfield, PA (60 dBu contour to proposed 54 dBu interference contour), and W230BB, 93.9, Elmira, NY (60 dBu contour to proposed 40 dBu interference 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