

## 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, 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 74.1204(d) Study demonstrate that there is no prohibited contour overlap between these four facilities and the instant proposed FM translator facilities. One currently operating 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: WAVT-FM, 101.9, Pottsville, PA (54 dBu contour to proposed 48 dBu interference contours); WGGY, 101.3, Scranton, PA (54 dBu contour to proposed 94 dBu interference contours); WLTB, 101.7, Johnson City, NY (60 dBu contour to proposed 40 dBu interference contours); WHBS, 102.3, Pittston, PA (60 dBu contour to proposed 100 dBu interference contours); and W270CC, 101.9, Hamlin, PA (60 dBu contour to prop. 54 dBu int. contours). W269CF 101.7 Clarks Summit, PA b 74.1204(d) Narrative is included to show allowable overlap under Section 74.1204(d) with this proposal's 130 dBu interference contour and the 90 dBu coverage contour of WGGY, Scranton, PA and with this proposal's 110 dBu interference contour and the 70 dBu coverage contour of WHBS, Pittston, 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