

Exhibit 12

Channel Scan Report
W223AZ CP Mod
Richmond VA

ComStudy 2.2 search of channel 223 (92.5 MHz Class D) .01 Kwatt 55M AGL
at 37-33-31.0 N, 77-24-33.0 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARAN
950515MA	ETTRICK	VA	226	A	31.42	0.00	203.0	29.40
NEW	CHESTER	VA	277	D	16.81	0.00	193.5	16
NEW	MT. PLEASANT	VA	223	D	143.33	0.00	128.4	34.40
NEW	VIRGINIA BEACH	VA	223	D	144.55	0.00	127.5	33.91
NEW	WAKEFIELD	VA	220	A	78.63	0.00	148.4	30.05
W223AZ	RICHMOND	VA	223	D	4.36	0.00	277.8	-62.39
W223BI	WAVERLY	VA	223	D	59.38	0.00	161.9	16.19
W276BZ	MIDLOTHIAN	VA	276	D	17.74	0.00	253.2	17
W276BZ	MIDLOTHIAN	VA	276	D	17.74	0.00	253.2	17
WCDX	MECHANICSVILLE	VA	221	B1	19.25	0.00	333.7	16.90
WCDX	MECHANICSVILLE	VA	221	B1	8.09	0.00	16.1	-25.84
WCDX	MECHANICSVILLE	VA	221	B1	11.26	0.00	303.5	-27.01
WGTS	TAKOMA PARK	MD	220	B	149.95	0.00	9.2	33.47
WGTS	TAKOMA PARK	MD	220	B	162.49	0.00	12.5	39.44
WINC-FM	WINCHESTER	VA	223	B	164.12	0.00	341.1	38.71
WINC-FM	WINCHESTER	VA	223	B	164.19	0.00	341.1	20.92
WINC-FM	WINCHESTER	VA	223	B	164.12	0.00	341.1	20.80
WINC-FM	WINCHESTER	VA	223	B	164.17	0.00	341.1	20.84
WLFU	ETTRICK	VA	226	A	34.67	0.00	203.6	3.66
WNRN	CHARLOTTESVILLE	VA	220	A	105.73	0.00	296.8	36.52
WPOC	BALTIMORE	MD	226	B	200.19	0.00	16.3	39.82
WPOC	BALTIMORE	MD	226	B	200.21	0.00	16.3	39.02
WTYD	DELTAVILLE	VA	222	A	85.83	0.00	94.5	25.34
WTYD	DELTAVILLE	VA	222	A	85.83	0.00	94.5	26.08
WUVA	CHARLOTTESVILLE	VA	224	A	105.56	0.00	297.1	32.21
WUBW	SUFFOLK	VA	225	B	117.89	0.00	129.8	28.99
WUBW	SUFFOLK	VA	225	B	117.89	0.00	129.8	19.85
WUHL	FARMVILLE	VA	225	A	100.73	0.00	252.7	31.03
WXLK	ROANOKE	VA	222	C	246.04	0.00	261.5	36.28
WXMD	POCOMOKE CITY	MD	223	A	166.67	0.00	66.5	39.25
WYFL	HENDERSON	NC	223	C0	164.20	0.00	205.6	25.63

Exhibit 12

Radio Training Network Inc.

P O Box 7217
Lakeland, FL 33807-7217

WAIVER REQUEST, SECTION 74.1204

The proposed FM translator is located within the protected 57dBu contour of station, WCDX on Second adjacent channel 221B1, Mechanicsville, VA. The predicted F (50-50) field strength of WCDX at the proposed translator site is 80 dbu or grater from both the main and auxiliary transmitter sites. Therefore, the respective interfering contour generated by the proposed FM Translator site is 120 dbu and extends less than 23 meters from the transmit antenna. Radio Training Network Inc. proposes to use a 1 bay transmit antenna 55 Meters above ground level. Due to the elevation and .01 Kwatt ERP the 120 dbu interfering contour does not reach the ground or any likely receiver locations.

The area surrounding the proposed translator site is industrial in nature with the tallest buildings 2-3 stories tall or about 10 meters. See the attached aerial photo provided by the U.S. Geological Survey's National Aerial Photography Program included to show the nature of the buildings in the area. Because the interfering contour extends less than 23 meters from the transmit antenna in any direction, the interfering contour occurs 32 meters or grater above ground.

Attached is the vertical radiation pattern of the proposed SWR FM1 antenna and a spread sheet that shows that the predicted signal level near the translator site is even less than what the 10 watt ERP will produce because of the attenuation of the antenna field at angles below the horizon.

Therefore, Radio Training Network Inc. Respectfully requests a waiver of C.F.R 74.1204 based on no population within the area of predicted interference.

Should any Actual interference occur, then Radio Training Network, Inc will promptly suspend operation of this translator in accordance with 47 C.F.R. 74.1203.

RADIO TRAINING NETWORK

Richmond Va

Radio Training Network, Inc proposes to use a SWR FM1 antenna.

This work sheet shows expected signal levels on the ground and at a safety plane 10 meters AGL

Distances and signal levels are computed for every 5 degrees below horizontal at antenna center of radiation.

This safety plane is based on the highest likely receiver elevation AGL. Distance from Antenna is also computed to the intercept of the safety plane or ground level and a line from the antenna center of radiation.

0.010 Kilowatts ERP

Antenna Make: SWR

55 Meters AGL to Radiation Center

Antenna Model: FM1

10 Meters AGL of Highest Receiver (Safety Plane)

120 dbu Interfering contour

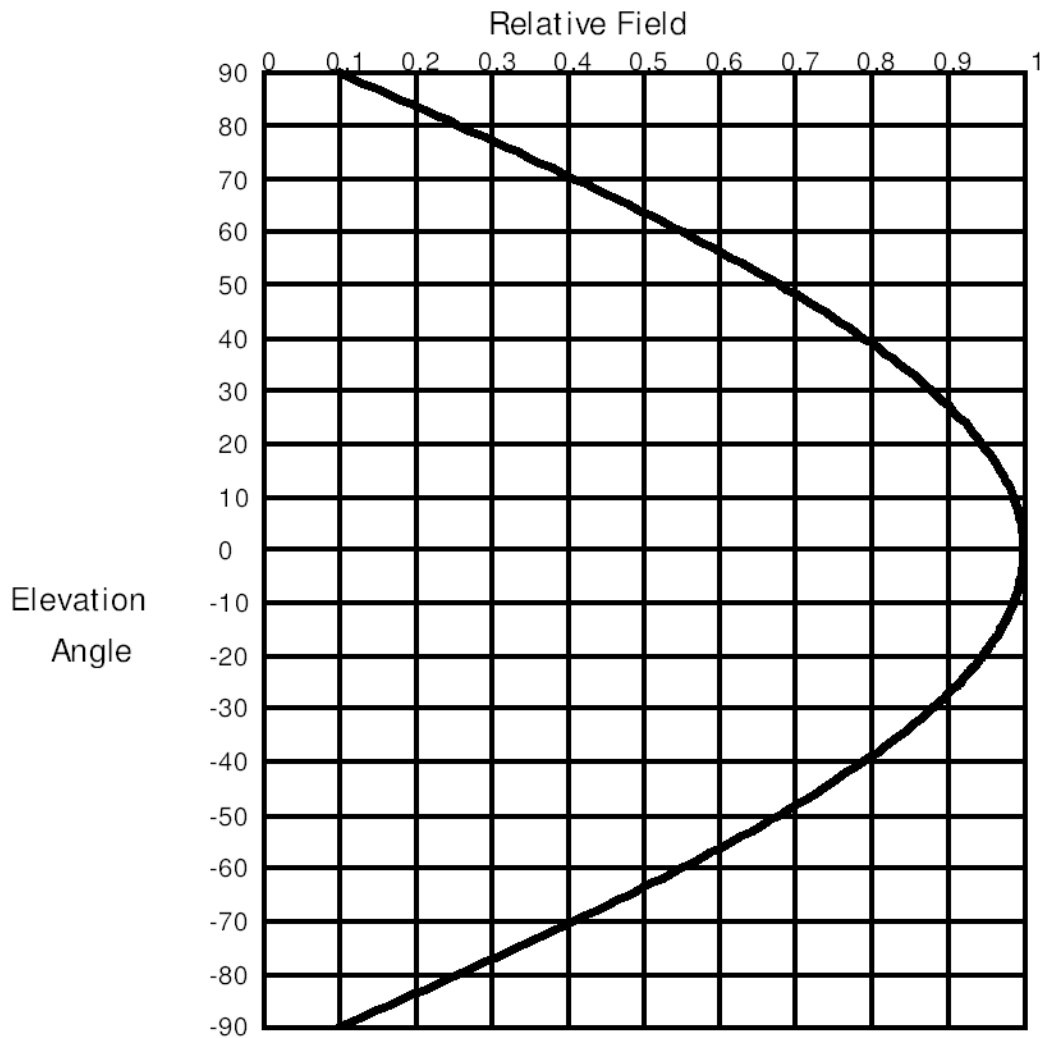
Angle Below Horizoi	Antenna Rel. Field	ERP Kwatts	ERP DbK	Distance from Antenna to Interfering	Dist.From Ant. toSafety Plane	Field Strenth In dbu at Safety Plane	Dist.From Ant. to Ground Level	Field Strenth In Dbu at Ground Level
0	1.000	0.0100	-20.00	22 m	INF m		INF	
5	0.997	0.0099	-20.03	22 m	516.3 m	92.6 dbu	631.1 m	90.9 dbu
10	0.986	0.0097	-20.12	22 m	259.1 m	98.5 dbu	316.7 m	96.8 dbu
15	0.969	0.0094	-20.27	21 m	173.9 m	101.8 dbu	212.5 m	100.1 dbu
20	0.945	0.0089	-20.49	21 m	131.6 m	104.0 dbu	160.8 m	102.3 dbu
25	0.916	0.0084	-20.76	20 m	106.5 m	105.6 dbu	130.1 m	103.9 dbu
30	0.879	0.0077	-21.12	19 m	90.0 m	106.7 dbu	110.0 m	105.0 dbu
35	0.837	0.0070	-21.55	19 m	78.5 m	107.5 dbu	95.9 m	105.7 dbu
40	0.789	0.0062	-22.06	18 m	70.0 m	108.0 dbu	85.6 m	106.2 dbu
45	0.736	0.0054	-22.66	16 m	63.6 m	108.2 dbu	77.8 m	106.4 dbu
50	0.679	0.0046	-23.36	15 m	58.7 m	108.2 dbu	71.8 m	106.4 dbu
55	0.616	0.0038	-24.21	14 m	54.9 m	107.9 dbu	67.1 m	106.2 dbu
60	0.550	0.0030	-25.19	12 m	52.0 m	107.4 dbu	63.5 m	105.7 dbu
65	0.480	0.0023	-26.38	11 m	49.7 m	106.6 dbu	60.7 m	104.9 dbu
70	0.408	0.0017	-27.79	9 m	47.9 m	105.5 dbu	58.5 m	103.8 dbu
75	0.333	0.0011	-29.55	7 m	46.6 m	104.0 dbu	56.9 m	102.3 dbu
80	0.256	0.0007	-31.84	6 m	45.7 m	101.9 dbu	55.8 m	100.1 dbu
85	0.178	0.0003	-34.99	4 m	45.2 m	98.8 dbu	55.2 m	97.1 dbu
90	0.100	0.0001	-40.00	2 m	45.0 m	93.9 dbu	55.0 m	92.1 dbu

Formulas used

Distance to Contour =

Field Strength=

$$(10^{((106.92 - [\text{desiredDbu}] + [\text{ERPInDbK}]) / 20))} * 1000) / 106.92 - (20 * (\text{LOG}([\text{DistKm}] / 1000))) + ([\text{ERPInDbK}])$$



Elevation Pattern

Scale: Linear

Units: Field, Relative

Systems With Reliability Inc.

Date: 11/10/03

CLIENT: *General*

ANTENNA TYPE: FM1/1

FREQUENCY: 98.1

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/-0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/-0.539 dBd

Null Fill(s)(%) : 0, 0, 0

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
3.2	.999 (-0.012)	-4.4	.997 (-0.023)	-12.0	.98 (-0.173)
3.0	.999 (-0.011)	-4.6	.997 (-0.025)	-12.2	.98 (-0.178)
2.8	.999 (-0.009)	-4.8	.997 (-0.027)	-12.4	.979 (-0.184)
2.6	.999 (-0.008)	-5.0	.997 (-0.03)	-12.6	.978 (-0.19)
2.4	.999 (-0.007)	-5.2	.996 (-0.032)	-12.8	.978 (-0.196)
2.2	.999 (-0.006)	-5.4	.996 (-0.035)	-13.0	.977 (-0.203)
2.0	.999 (-0.005)	-5.6	.996 (-0.037)	-13.2	.976 (-0.209)
1.8	1.00 (-0.004)	-5.8	.995 (-0.04)	-13.4	.975 (-0.215)
1.6	1.00 (-0.003)	-6.0	.995 (-0.043)	-13.6	.975 (-0.222)
1.4	1.00 (-0.002)	-6.2	.995 (-0.046)	-13.8	.974 (-0.229)
1.2	1.00 (-0.002)	-6.4	.994 (-0.049)	-14.0	.973 (-0.235)
1.0	1.00 (-0.001)	-6.6	.994 (-0.052)	-14.2	.973 (-0.242)
.8	1.00 (-0.001)	-6.8	.994 (-0.055)	-14.4	.972 (-0.249)
.6	1.00 (0)	-7.0	.993 (-0.058)	-14.6	.971 (-0.256)
.4	1.00 (0)	-7.2	.993 (-0.062)	-14.8	.97 (-0.263)
.2	1.00 (0)	-7.4	.993 (-0.065)	-15.0	.969 (-0.271)
.0	1.00 (0)	-7.6	.992 (-0.069)	-15.2	.969 (-0.278)
-.2	1.00 (0)	-7.8	.992 (-0.073)	-15.4	.968 (-0.285)
-.4	1.00 (0)	-8.0	.991 (-0.076)	-15.6	.967 (-0.293)
-.6	1.00 (0)	-8.2	.991 (-0.08)	-15.8	.966 (-0.3)
-.8	1.00 (-0.001)	-8.4	.99 (-0.084)	-16.0	.965 (-0.308)
-1.0	1.00 (-0.001)	-8.6	.99 (-0.088)	-16.2	.964 (-0.316)
-1.2	1.00 (-0.002)	-8.8	.989 (-0.093)	-16.4	.963 (-0.324)
-1.4	1.00 (-0.002)	-9.0	.989 (-0.097)	-16.6	.962 (-0.332)
-1.6	1.00 (-0.003)	-9.2	.988 (-0.101)	-16.8	.962 (-0.34)
-1.8	1.00 (-0.004)	-9.4	.988 (-0.106)	-17.0	.961 (-0.348)
-2.0	.999 (-0.005)	-9.6	.987 (-0.11)	-17.2	.96 (-0.357)
-2.2	.999 (-0.006)	-9.8	.987 (-0.115)	-17.4	.959 (-0.365)
-2.4	.999 (-0.007)	-10.0	.986 (-0.12)	-17.6	.958 (-0.374)
-2.6	.999 (-0.008)	-10.2	.986 (-0.124)	-17.8	.957 (-0.383)
-2.8	.999 (-0.009)	-10.4	.985 (-0.129)	-18.0	.956 (-0.391)
-3.0	.999 (-0.011)	-10.6	.985 (-0.134)	-18.2	.955 (-0.4)
-3.2	.999 (-0.012)	-10.8	.984 (-0.14)	-18.4	.954 (-0.409)
-3.4	.998 (-0.014)	-11.0	.983 (-0.145)	-18.6	.953 (-0.418)
-3.6	.998 (-0.015)	-11.2	.983 (-0.15)	-18.8	.952 (-0.427)
-3.8	.998 (-0.017)	-11.4	.982 (-0.156)	-19.0	.951 (-0.437)
-4.0	.998 (-0.019)	-11.6	.982 (-0.161)	-19.2	.95 (-0.446)
-4.2	.998 (-0.021)	-11.8	.981 (-0.167)	-19.4	.949 (-0.456)

Systems With Reliability Inc.

Page 1 of 2

CLIENT: *General*

Date: 11/10/03

ANTENNA TYPE: FM1/1

FREQUENCY: 98.1

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/ -0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/ -0.539 dBd

Null Fill(s)(%) : 0, 0, 0

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
-19.6	.948 (-0.465)	-27.2	.90 (-0.911)	-54.0	.629 (-4.027)
-19.8	.947 (-0.475)	-27.4	.899 (-0.924)	-55.0	.616 (-4.205)
-20.0	.946 (-0.485)	-27.6	.898 (-0.939)	-56.0	.603 (-4.39)
-20.2	.945 (-0.495)	-27.8	.896 (-0.953)	-57.0	.59 (-4.58)
-20.4	.944 (-0.505)	-28.0	.895 (-0.967)	-58.0	.577 (-4.778)
-20.6	.942 (-0.515)	-28.2	.893 (-0.981)	-59.0	.564 (-4.982)
-20.8	.941 (-0.525)	-28.4	.892 (-0.996)	-60.0	.55 (-5.193)
-21.0	.94 (-0.535)	-28.6	.89 (-1.01)	-61.0	.536 (-5.411)
-21.2	.939 (-0.546)	-28.8	.889 (-1.025)	-62.0	.523 (-5.638)
-21.4	.938 (-0.556)	-29.0	.887 (-1.04)	-63.0	.509 (-5.873)
-21.6	.937 (-0.567)	-29.2	.886 (-1.055)	-64.0	.495 (-6.116)
-21.8	.936 (-0.578)	-29.4	.884 (-1.07)	-65.0	.48 (-6.369)
-22.0	.934 (-0.589)	-29.6	.883 (-1.085)	-66.0	.466 (-6.631)
-22.2	.933 (-0.6)	-29.8	.881 (-1.101)	-67.0	.452 (-6.904)
-22.4	.932 (-0.611)	-30.0	.879 (-1.116)	-68.0	.437 (-7.187)
-22.6	.931 (-0.622)	-31.0	.871 (-1.195)	-69.0	.423 (-7.483)
-22.8	.93 (-0.633)	-32.0	.863 (-1.277)	-70.0	.408 (-7.791)
-23.0	.928 (-0.645)	-33.0	.855 (-1.363)	-71.0	.393 (-8.112)
-23.2	.927 (-0.656)	-34.0	.846 (-1.451)	-72.0	.378 (-8.448)
-23.4	.926 (-0.668)	-35.0	.837 (-1.543)	-73.0	.363 (-8.799)
-23.6	.925 (-0.68)	-36.0	.828 (-1.638)	-74.0	.348 (-9.167)
-23.8	.923 (-0.692)	-37.0	.819 (-1.737)	-75.0	.333 (-9.553)
-24.0	.922 (-0.704)	-38.0	.809 (-1.839)	-76.0	.318 (-9.959)
-24.2	.921 (-0.716)	-39.0	.799 (-1.944)	-77.0	.302 (-10.387)
-24.4	.92 (-0.728)	-40.0	.789 (-2.054)	-78.0	.287 (-10.839)
-24.6	.918 (-0.74)	-41.0	.779 (-2.167)	-79.0	.272 (-11.317)
-24.8	.917 (-0.753)	-42.0	.769 (-2.283)	-80.0	.256 (-11.826)
-25.0	.916 (-0.765)	-43.0	.758 (-2.404)	-81.0	.241 (-12.367)
-25.2	.914 (-0.778)	-44.0	.747 (-2.529)	-82.0	.225 (-12.946)
-25.4	.913 (-0.791)	-45.0	.736 (-2.658)	-83.0	.21 (-13.569)
-25.6	.912 (-0.803)	-46.0	.725 (-2.791)	-84.0	.194 (-14.241)
-25.8	.91 (-0.816)	-47.0	.714 (-2.928)	-85.0	.178 (-14.97)
-26.0	.909 (-0.83)	-48.0	.702 (-3.071)	-86.0	.163 (-15.768)
-26.2	.908 (-0.843)	-49.0	.69 (-3.217)	-87.0	.147 (-16.648)
-26.4	.906 (-0.856)	-50.0	.679 (-3.369)	-88.0	.131 (-17.627)
-26.6	.905 (-0.87)	-51.0	.666 (-3.525)	-89.0	.116 (-18.733)
-26.8	.903 (-0.883)	-52.0	.654 (-3.687)	-90.0	.10 (-20)
-27.0	.902 (-0.897)	-53.0	.642 (-3.854)	90.0	.00 (-50)

Systems With Reliability Inc.

Page 2 of 2

CLIENT: *General*

Date: 11/10/03

ANTENNA TYPE: FM1/1

FREQUENCY: 98.1

PATTERN POL.: Circular

DIRECTIVITY(Peak): 0.883/ -0.539 dBd

Beam Tilt (Deg.) : 0

DIRECTIVITY(Horiz): 0.883/ -0.539 dBd

Null Fill(s)(%) : 0, 0, 0

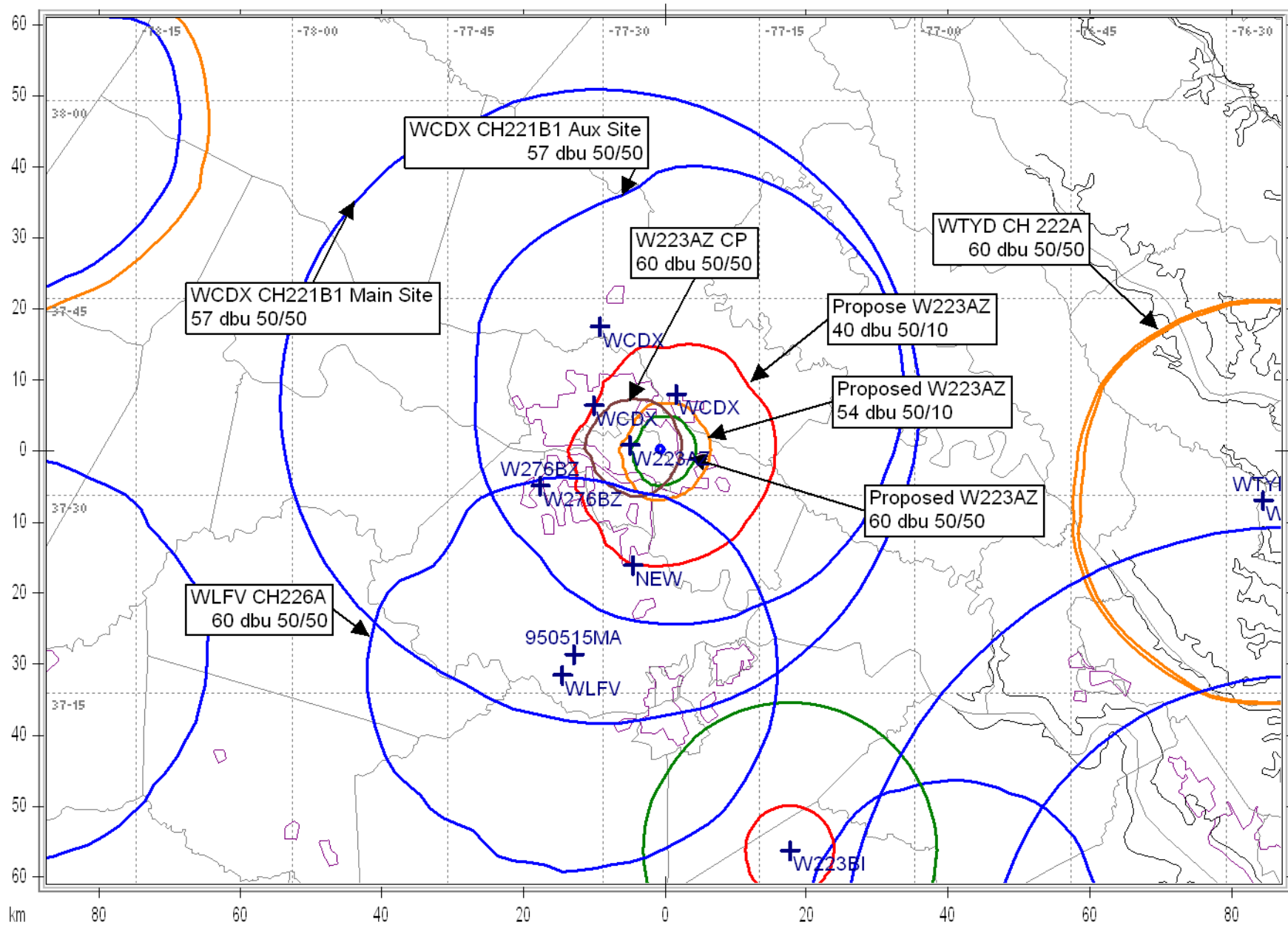


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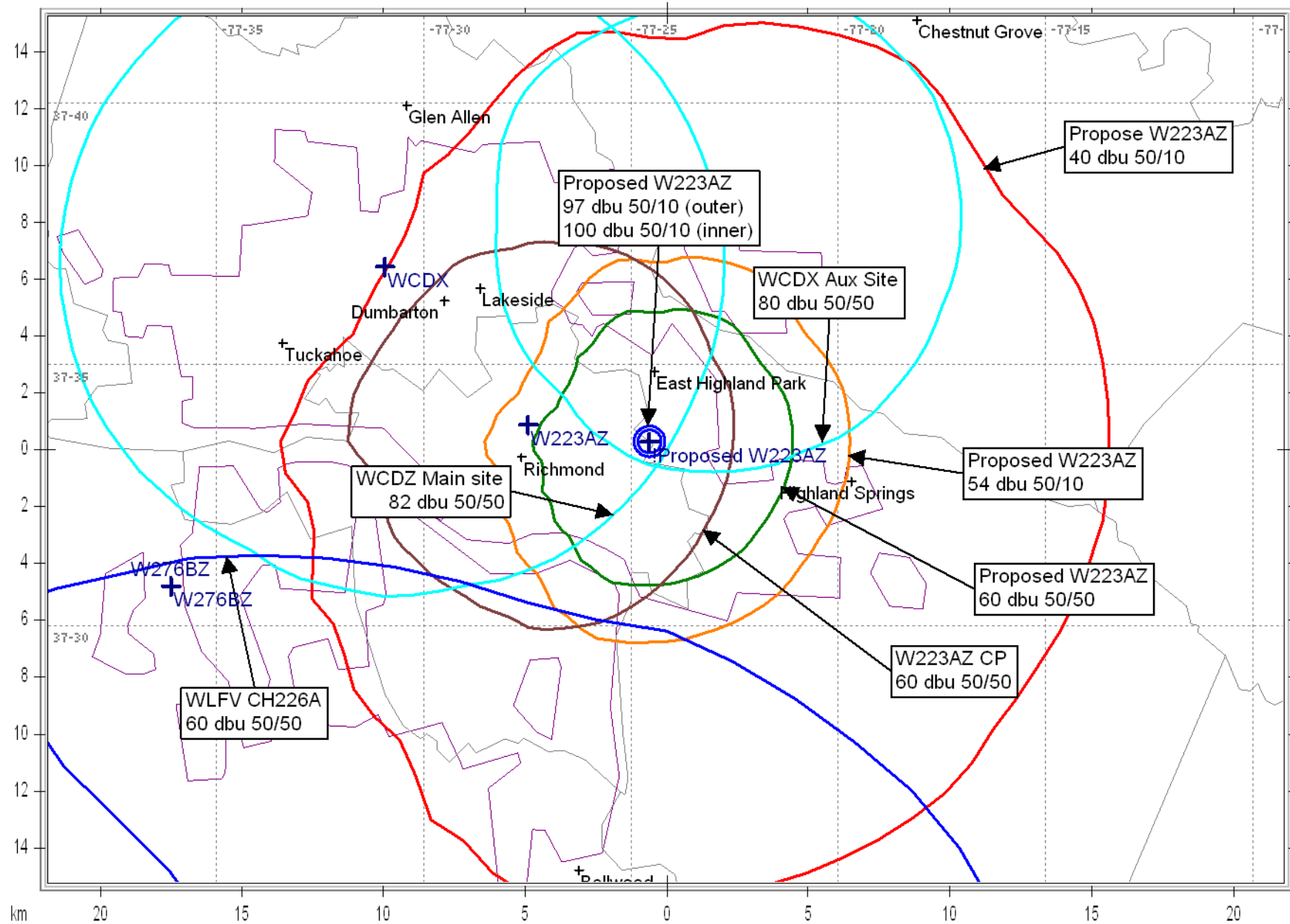
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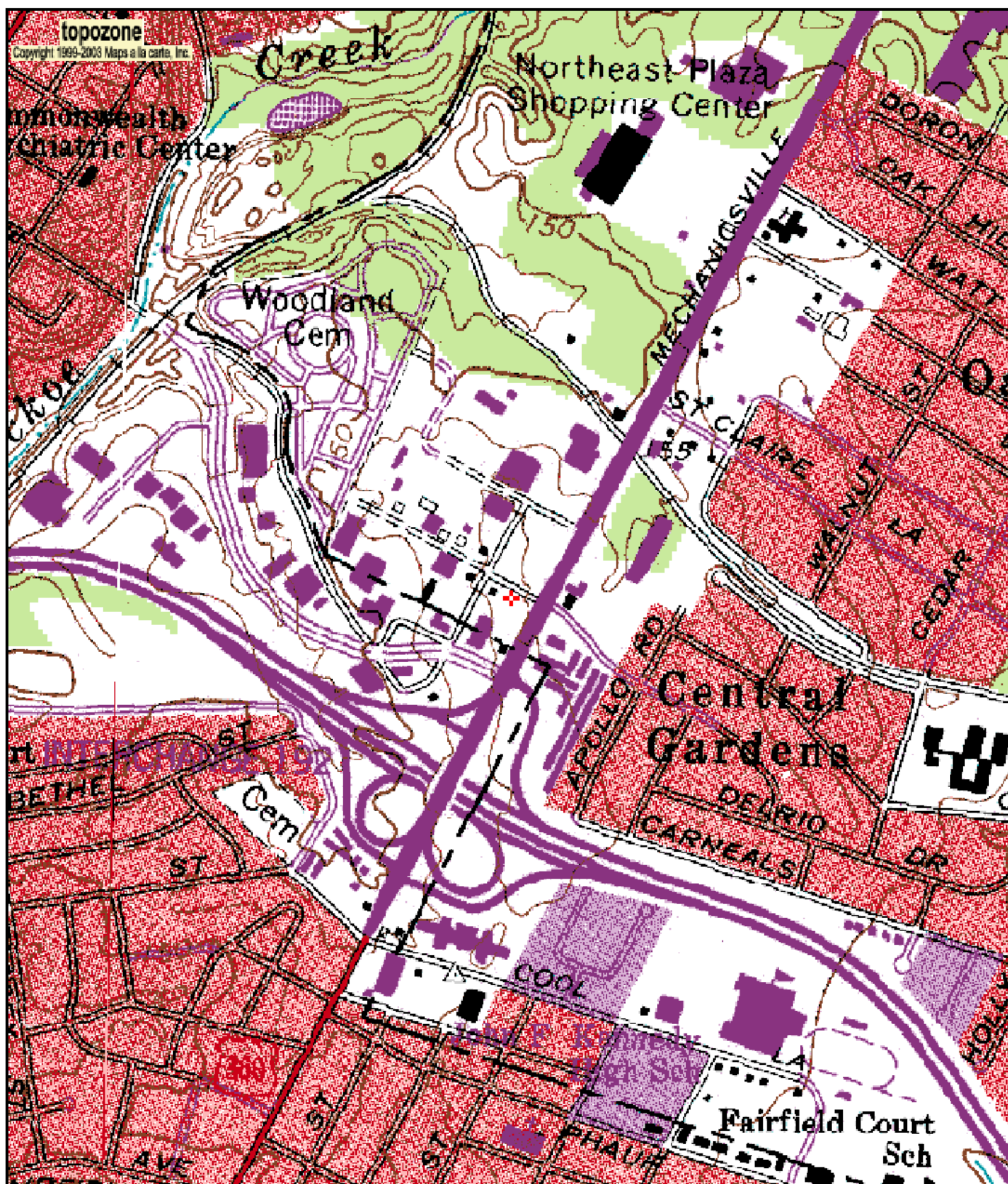
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W223AZ CP Minor Mod Richmond VA



W223AZ CP Minor Mod Richmond VA





0 0.1 0.2 0.3 0.4 0.5 km
0 0.09 0.18 0.27 0.36 0.45 mi

37° 33' 31"N, 77° 24' 33"W (NAD27)

Glen Lea School (historical), USGS Richmond (VA) Quadrangle

Projection is UTM Zone 18 NAD83 Datum



M=-10.193

G=-1.469