

# Exhibit 13

## Radio Training Network Inc.

P O Box 7217  
Lakeland, FL 33807-7217

### W280EA, Ruskin, FL Channel Spacing Report for Channel 280

ComStudy 2.2 search of channel 280 (103.9 MHz Class D) at 27-47-34.0 N, 82-23-06.0 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
NEW	ST. PETERSBURG	FL	281	D	24.93	0.00	289.3	7.98 dB
NEW	TAMPA	FL	282	D	22.40	0.00	353.0	18.79 dB
W280DW	TAMPA	FL	280	D	30.54	0.00	354.2	-6.57 dB*
W280EA	RUSKIN	FL	280	D	11.36	0.00	194.6	-25.73 dB
WFLZ-FM	TAMPA	FL	227	C	13.23	29.00	65.4	-15.8**
WFLZ-FM	TAMPA	FL	227	C	12.59	29.00	76.4	-16.4**
WFLZ-FM	TAMPA	FL	227	C	12.59	29.00	76.4	-16.4**
WFUS	GULFPORT	FL	278	C0	12.59	0.00	76.4	-30.73 dB***
WFUS	GULFPORT	FL	278	C0	12.59	0.00	76.4	-39.05 dB***
WFUS	GULFPORT	FL	278	C0	13.26	0.00	65.4	-39.19 dB***
WKZM	SARASOTA	FL	282	A	58.16	0.00	189.4	18.68 dB
WKZM	SARASOTA	FL	282	C3	58.16	0.00	189.4	11.34 dB

\*This is incoming interference from W280DW, There is no out going interference to W280DW. See Contour Map.

\*\*This application is for less than 100 watts and is exempt from IF separation requirements.

\*\*\*WFUS is on 2<sup>nd</sup> adjacent channel to this application. See attached waiver request showing protection of WFUS from interference.

## WAIVER REQUEST, SECTION 74.1204

The proposed FM translator is located within the protected 60dbu contour of station, WFUS on second adjacent channel 278, Gulfport, FL. The predicted F (50-50) field strength of WFUS License and CP at the proposed translator site is 97dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 137 dbu and extends less than 10 meters from the transmit antenna, which will be mounted 15 meters above ground.

The area surrounding the proposed translator site is farming and small businesses. See the attached aerial photo and Topo map included to show the nature of the buildings in the area. Because the interfering contour extends less than 10 meters from the transmit antenna in any direction, and the interfering contour occurs 5 meters or greater above ground, there are no likely receiver locations in the limited area of predicted interference.

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.





## Audio Division

(202)-418-2700

## FM and TV Propagations Curves Calculations

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[FCC site map](#)

### Results -- FM and TV Propagation Curves Calculations

Entered HAAT is less than 30 meters -- Set to 30 m

Free Space equation used, not curves

#### Results of Calculation

**Distance to Contour = 0.010 km**

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#### For input data from Pages 1 and 2:

ERP entered = 0.099 kW

HAAT entered = 15.00 meters

Field Strength entered = 137.000 dBu

Find the Distance to the Contour, Given a Field Strength

F(50,10) curves for interfering contours

FM and NTSC analog TV Channels 2 through 6

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Comments on this program may be referred to [Dale Bickel](#)

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