

Exhibit 13

Radio Training Network Inc.

P O Box 7217
Lakeland, FL 33807-7217

Channel Spacing Report for Channel 220

ComStudy 2.2 search of channel 220 (91.9 MHz Class D)
at 32-49-01.0 N, 79-50-09.6 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
WCKN	MONCKS CORNER	SC 223 C1	0.13	0.00	28.2	-77.89 dB*
WCKN	MONCKS CORNER	SC 223 C1	0.13	0.00	28.2	-72.86 dB*
W220CN	CHARLESTON	SC 220 D	3.46	0.00	201.4	-38.52 dB***
WXLY	NORTH CHARLESTON	SC 273 C1	0.12	22.00	16.9	-21.9**
WXLY	NORTH CHARLESTON	SC 273 C1	0.12	22.00	16.9	-21.9**
WKCL	LADSON	SC 218 C1	31.60	0.00	312.0	-10.68 dB*
WCES-TV	WRENS	GA 6 TV	234.01	0.00	282.8	-0.00 dB
W221CI	GOOSE CREEK	SC 221 D	31.60	0.00	311.9	1.95 dB
WMYB	MYRTLE BEACH	SC 221 C1	112.97	0.00	40.2	10.88 dB
WWOS-FM	ST. GEORGE	SC 220 A	99.64	0.00	307.7	11.55 dB
WLFS	PORT WENTWORTH	GA 220 C3	130.86	0.00	236.2	17.12 dB

*See waiver request showing protection to WCKN and WKCL.

** This application is for less than 100 Watts and is exempt from IF separation requirement.

*** Current facility for this application

WAIVER REQUEST, SECTION 74.1204

The area surrounding the proposed translator site is single family residential with one or two story homes and light commercial. See the attached aerial photo and Topo map included to show the nature of the buildings in the area.

The proposed FM translator on Channel 220 is located within the protected 60dbu contour of station, WCKN on third adjacent channel 223C1, Moncks Corner, SC. The predicted F (50-50) field strength of WCKN at the proposed translator site is 120 dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 160 dbu and extends less than 3 meters in any direction from the antenna, which is located 145 meters above ground level. Because the interfering contour occurs 142 meters or greater above ground, there are no likely receiver locations in the limited area of predicted interference to WCKN.

The proposed FM translator is located within the protected 60dbu contour of station, WKCL on second adjacent channel 218, Ladson, SC. The predicted F (50-50) field strength of WKCL at the proposed translator site is 70 dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 110 dbu. Radio Training Network, Inc. will use a Nicom BKG-77 two bay antenna with $\frac{3}{4}$ wave spacing. Attached is a spreadsheet showing predicted field strength at ground level and at a plane 5 meters above ground. The greater predicted at 5 meters AGL is 103.1 dBu, 6.9 dB below the threshold of predicted interference to WKCL. Because the interfering contour occurs above ground, there are no likely receiver locations in the limited area of predicted interference to WKCL.

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.