

## Exhibit 13

### Radio Training Network Inc.

P O Box 7217  
Lakeland, FL 33807-7217

#### Channel Spacing Report for Channel 221

ComStudy 2.2 search of channel 221 (92.1 MHz Class D) at 32-55-42.4 N, 80-06-12.7 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
W221CI	SUMMERVILLE	SC	221	D	10.65	0.00	350.2	-67.09 dB*
WKCL	LADSON	SC	218	C1	8.79	0.00	9.4	-34.62 dB**
WCKN	MONCKS CORNER	SC	223	C1	27.92	0.00	116.1	-20.72 dB**
WWOS	ST. GEORGE	SC	220	C3	65.32	0.00	316.5	4.98 dB
W220CN	CHARLESTON	SC	220	D	28.42	0.00	123.3	4.19 dB
WMYB	MYRTLE BEACH	SC	221	C1	122.72	0.00	52.8	6.21 dB
WBHC-FM	HAMPTON	SC	221	A	96.09	0.00	264.7	10.45 dB
NEW	CHARLESTON	SC	275	LP100	19.07	7.00	154.5	12.1
WWOS	ST. GEORGE	SC	220	A	72.45	0.00	311.8	16.85 dB
WBHC-FM*	HAMPTON	SC	221	A	95.99	0.00	264.7	17.96 dB
WMYB	MYRTLE BEACH	SC	221	C1	113.10	0.00	56.6	21.49 dB
WWNU	IRMO	SC	221	C3	159.39	0.00	323.8	22.63 dB
WWNU	IRMO	SC	221	C3	147.13	0.00	324.3	23.46 dB

\*Licensed site for this application.

\*\*See waiver request showing protection to WKCL and WCKN.

## **WAIVER REQUEST, SECTION 74.1204**

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

The proposed FM translator is located within the protected 60dbu contour of station, WKCL on third adjacent channel 218, Ladson, SC The predicted F (50-50) field strength of WKCL at the proposed translator site is 90 dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 130 dbu and extends less than 32 meters from the transmit antenna in any direction from the antenna, which is located 76 meters above ground level. Because the interfering contour occurs 44 meters or greater above ground, there are no likely receiver locations in the limited area of predicted interference to WKCL.

The proposed FM translator is located within the protected 60dbu contour of station, WCKN on second adjacent channel 223, Monks Corner, SC The predicted F (50-50) field strength of WCKN at the proposed translator site is 79 dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 119 dbu. Radio Training network, Inc proposes to use a Dielectric DCR-L2-75  $\frac{3}{4}$  wave spaced transmit antenna at 76 meters above ground level to reduce signal levels at ground level near the transmit site. See the attached spreadsheet showing the predicted signal levels at ground level and at a safety plane 6 meters above ground level. The maximum signal at the safety plane is 109.9 dBu, 9.1 db below the threshold for predicted interference to WCKN and there are no likely receiver locations in the limited area of predicted interference to WCKN.

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.