

Exhibit 13-3
Waiver Request for 2nd and 3rd adjacent Spacing

(St.Paul, MN Proposal, channel 256, 99.1 MHz)

6/21/2014

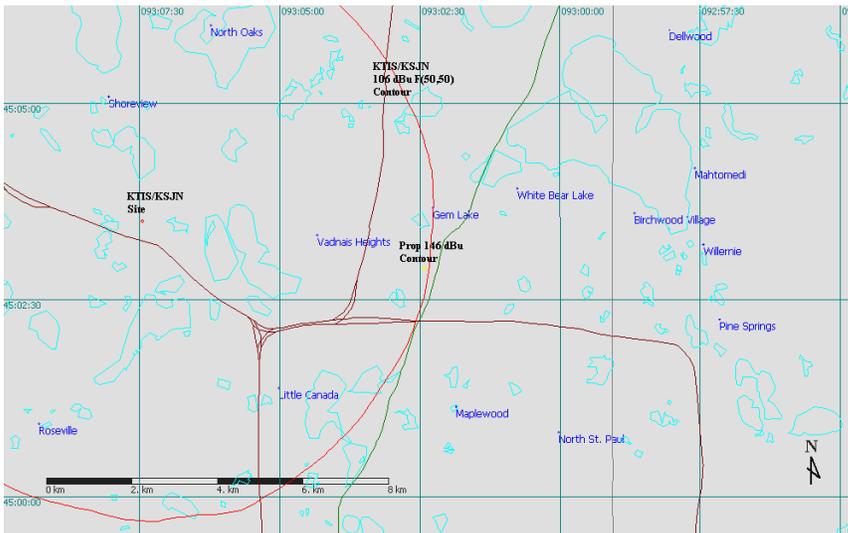
Refuge Media Group respectfully requests waiver of 47 C.F.R. § 74.1204(b)

This application is 3rd adjacent to station KTIS-FM (ch 253) and 2nd adjacent to station KSJN (ch 258.) The distance from this proposal's location to these station's transmitting facility is less than what is required pursuant to §74.1204(b). However, pursuant to the lack of population criteria set forth in §74.1204(d), a waiver of §74.1204(b) can be granted. As shown below, the predicted interference signal reaches a population of zero as the interfering signal does not reach the ground.

KTIS Ch 253A (98.5 MHz) & **KSJN** Ch 258 (99.5 MHz)¹
45° 3' 30" NL, 93° 7' 27" WL
RCAMSL: 593 m
RCAGL: 316 meters
Bearing toward Proposal: 280° True
ERP: 100.0 kW
HAAT: 315 meters
Distance to Proposed site: 6.8 km
Signal @ 6.8 km in 280° radial: 106.0 dBu F(50,50)

Translator Proposal: Ch 256 FX (99.1 MHz)
45° 2' 54" NL, 93° 2' 25" WL
RCAMSL: 329 meters
RCAGL: 39 meters
Bearing to KTIS/KSJN: 100° True
MERP: 0.038 kW
HAAT: (avg of 12 radials:) 46.7 m
Interference Signal: 146.0 dBu F(50,10)²
Distance to Interference signal: 2 meters

Terrain Source: FCC 30-sec DEM (NGDC)



Interference Reaches Zero Population:

Based on the above data, the predicted interference *does not* reach the ground. Therefore granting this proposal will not cause predicted interference with anyone trying to receive stations KTIS-FM and KSJN³

¹ KTIS-FM & KSJN have exactly the same facilities as they both use the same antenna system.

²Based on the ratios set forth in § 74.1204(a) for stations separated by 2 or 3 channels, the interference signal of this proposed 2nd and 3rd adjacent translator must be 40 dB (100:1 ratio) higher before *predicted* interference will occur. (106 + 40 = 146)

³ Even though the predicted interference remains above ground, reaching zero population, in the event actual interference should occur to *any* station, Refuge Media Group recognizes it must comply with provisions of 47 C.F.R. § 74.1203 concerning such interference.