

# Exhibit 13

## Radio Training Network Inc.

P O Box 7217

Lakeland, Fl 33807-7217

### Channel Spacing Report for Channel 258

ComStudy 2.2 search of channel 258 (99.5 MHz Class D)  
at 35-36-04.0 N, 82-39-07.0 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
WKSF	OLD FORT	NC	260	C	21.68	0.00	206.0	-34.14 dB**
NEW	WEST ASHEVILLE	NC	258	D	0.00	0.00	90.0	-20.00 dB*
WSPA-FM	SPARTANBURG	SC	255	C	58.01	0.00	145.6	-9.23 dB***
WSPA-FM	SPARTANBURG	SC	255	C	58.01	0.00	145.6	-9.23 dB
WKSF	ASHEVILLE	NC	260	C	21.68	0.00	206.0	-6.92 dB
WKSF*	OLD FORT	NC	260	C	21.68	0.00	206.0	-6.92 dB
WSPA-FM	SPARTANBURG	SC	255	C	58.01	0.00	145.6	-5.77 dB
NEW	HENDERSONVILLE	NC	257	D	32.84	0.00	152.5	5.64 dB
W209AE	CULLOWHEE, ETC.	NC	258	D	57.88	0.00	243.3	6.87 dB
WNCW	SPINDALE	NC	204	C	36.28	29.00	65.6	7.3
W249CB	GREENVILLE	SC	258	D	77.28	0.00	163.1	10.05 dB
WTZR	ELIZABETHTON	TN	257	C3	97.63	0.00	24.2	17.15 dB
NEW	BOONE	NC	258	D	112.19	0.00	51.0	24.51 dB
WTZR	ELIZABETHTON	TN	257	C3	103.13	0.00	26.5	25.65 dB

\*Short Form app for this Facility.

\*\* See attached Waiver request showing protection of WKSF and WSPA-FM from Interference.

## **WAIVER REQUEST, SECTION 74.1204**

Radio Training Network, Inc proposes to use a 2 bay  $\frac{3}{4}$  spaced antenna mounted 38 meters above ground. This antenna will suppress the downward radiated signal so that the maximum expected signal strength at 6 meters above ground is 104.2 dBu.

The proposed FM translator is located within the protected 60dbu contour of station, WSPA-FM on third adjacent channel 255, Spartanburg, SC. The predicted F (50-50) field strength of WSPA-FM at the proposed translator site is 68 dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 108 dbu.

The proposed FM translator is located within the protected 60dbu contour of station, WKSF on third second adjacent channel 260, Old Fort, NC. The predicted F (50-50) field strength of WKSF 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.

The area surrounding the proposed translator site is a mountain top in forest land at the end of a private limited access road. There are no residential or occupied building within 200 meters of the site. See the attached aerial photo and topo map included to show the nature of the buildings in the area. Because the transmit antenna will be mounted 38 meters above ground level and have reduced signal at angles below the horizon. The interfering contour occurs 7 meters from the antenna and 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.

# RADIO TRAINING NETWORK

West Ashville, NC

Radio Training Network, Inc proposes to use a SWR FM antenna to reduce signal levels on ground near the tower.  
 This work sheet shows expected signal levels on the ground and at a safety plane 6 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**

**38 Meters AGL to Radiation Center**

**Antenna Model: FMEC2-75**

**6 Meters AGL of Highest Receiver ( Safety Plane)**

**130 dbu Interfering contour**

Angle Below Horizontal	Antenna Rel. Field	ERP Kwatts	ERP DbK	Distance from Antenna to Interfering	Dist.From Ant. to Safety Plane	Field Strength In dbu at Safety Plane	Dist.From Ant. to Ground Level	Field Strength In Dbu at Ground Level
0	1.000	0.0100	-20.00	7 m	INF m		INF	
5	0.976	0.0095	-20.21	7 m	367.2 m	95.4 dbu	436.0 m	93.9 dbu
10	0.905	0.0082	-20.87	6 m	184.3 m	100.7 dbu	218.8 m	99.3 dbu
15	0.795	0.0063	-21.99	6 m	123.6 m	103.1 dbu	146.8 m	101.6 dbu
20	0.655	0.0043	-23.68	5 m	93.6 m	103.8 dbu	111.1 m	102.3 dbu
25	0.498	0.0025	-26.06	3 m	75.7 m	103.3 dbu	89.9 m	101.8 dbu
30	0.337	0.0011	-29.45	2 m	64.0 m	101.3 dbu	76.0 m	99.9 dbu
35	0.174	0.0003	-35.19	1 m	55.8 m	96.8 dbu	66.3 m	95.3 dbu
40	0.044	0.0000	-47.13	0 m	49.8 m	85.8 dbu	59.1 m	84.4 dbu
45	0.070	0.0000	-43.10	0 m	45.3 m	90.7 dbu	53.7 m	89.2 dbu
50	0.157	0.0002	-36.08	1 m	41.8 m	98.4 dbu	49.6 m	96.9 dbu
55	0.217	0.0005	-33.27	2 m	39.1 m	101.8 dbu	46.4 m	100.3 dbu
60	0.249	0.0006	-32.08	2 m	37.0 m	103.5 dbu	43.9 m	102.0 dbu
65	0.257	0.0007	-31.80	2 m	35.3 m	104.2 dbu	41.9 m	102.7 dbu
70	0.245	0.0006	-32.22	2 m	34.1 m	104.1 dbu	40.4 m	102.6 dbu
75	0.216	0.0005	-33.31	2 m	33.1 m	103.2 dbu	39.3 m	101.7 dbu
80	0.175	0.0003	-35.14	1 m	32.5 m	101.5 dbu	38.6 m	100.1 dbu
85	0.125	0.0002	-38.06	1 m	32.1 m	98.7 dbu	38.1 m	97.2 dbu
90	0.071	0.0001	-42.97	0 m	32.0 m	93.8 dbu	38.0 m	92.3 dbu

Formulas used

Distance to Contour =

Field Strength=

$$10^{((106.92 - [\text{desiredDbu}] + [\text{ERP in DbK}]) / 20)} * 1000$$

$$106.92 - (20 * (\text{LOG}([\text{DistKm}] / 1000))) + ([\text{ERP in DbK}])$$

# West Ashville Ch 258 New FMX

