

# 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 32-47-16.4 N, 79-50-58.7 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
WCKN	MONCKS CORNER	SC 223 C1	3.58	0.00	21.6	-56.60 dB*
WXLY	NORTH CHARLESTON	SC 273 C1	3.57	22.00	21.3	-18.4**
WXLY	NORTH CHARLESTON	SC 273 C1	3.57	22.00	21.3	-18.4**
WXLY	NORTH CHARLESTON	SC 273 C1	3.57	22.00	21.3	-18.4**
WKCL	LADSON	SC 218 C1	32.96	0.00	317.6	-9.90 dB*
W221CI	SUMMERVILLE	SC 221 D	28.42	0.00	303.5	-4.96 dB***
W221CI	GOOSE CREEK	SC 221 D	27.09	0.00	321.5	0.17 dB
WCES-TV	WRENS	GA 6 TV	233.53	0.00	283.7	-0.00 dB
W221CI	SUMMERVILLE	SC 221 D	36.53	0.00	315.8	6.48 dB
WWOS-FM	ST. GEORGE	SC 220 A	100.65	0.00	309.6	10.88 dB
WMYB	MYRTLE BEACH	SC 221 C1	116.25	0.00	39.6	11.51 dB
WLFS	PORT WENTWORTH	GA 220 C3	128.04	0.00	237.1	15.35 dB
WCKN	MONCKS CORNER	SC 223 C0	20.68	0.00	42.7	20.80 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.

\*\*\* The CP for this W221CI facility in Summerville is being dismissed. An application was filed 7/28/2016 to move W221CI to Goose Creek, which is fully spaced to 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.

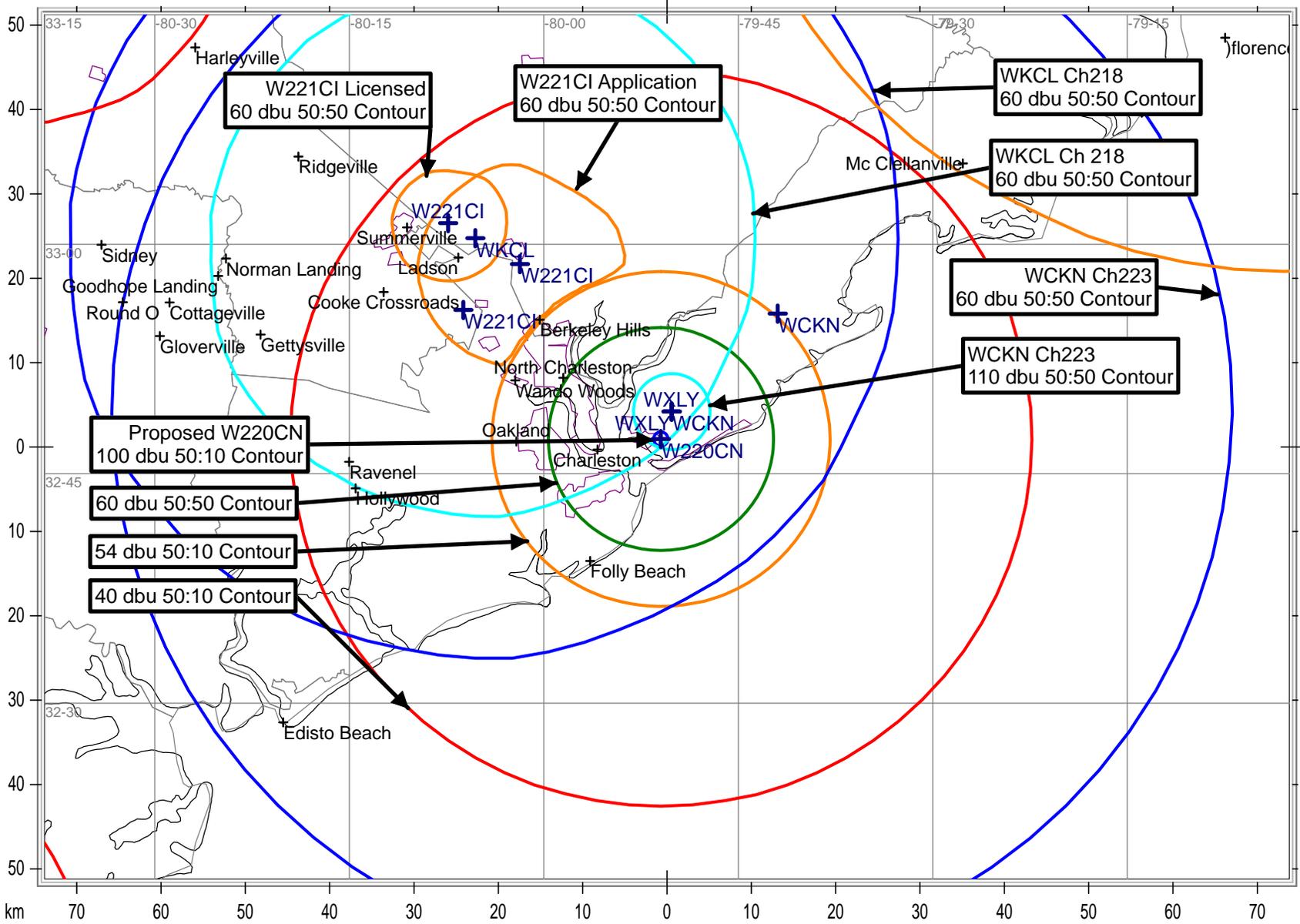
The proposed FM translator on Channel 220 is located within the protected 60dbu contour of station, WCKN on third adjacent channel 223C1, Moncks Corner, SC. The predicted F (50-50) field strength of WCKN at the proposed translator site is 110 dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 150 dbu and extends less than 3 meters in any direction from the antenna, which is located 171 meters above ground level. Because the interfering contour occurs 168 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 69 dbu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 109 dbu. Radio Training Network, Inc. will use an FMEC-1 single bay antenna. Attached is a spread sheet showing predicted field strength at ground level and at a plain 5 meters above ground. The greater predicted at 5 meters AGL is 106.8 dBu, 2.2 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.

W220CN CP Minor Mod Ch220



**Proposed Antenna:** SWR FMEC 1-Bay

**Proposed Power:** 0.099 kW

**Antenna Height AGL:** 171 meters

**Interference Contour:** 109 dBu f(50:10)

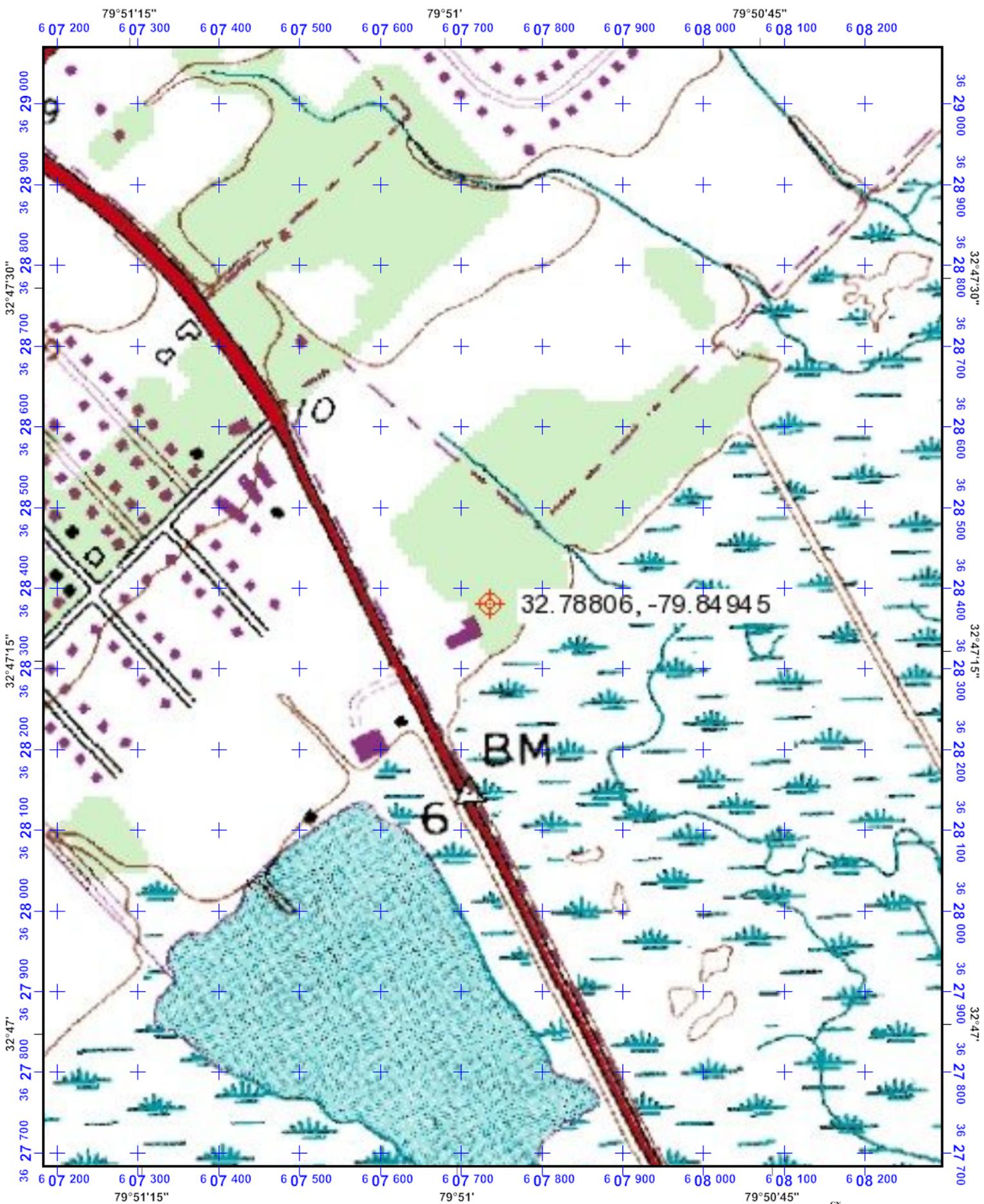
**Special Rcv Antenna Height:** 5 meters

Fill in "yellow" cells

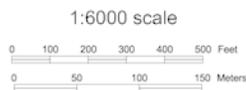
**Equation:**  $= (10^{((106.92 - [\text{desired dBu}] + [\text{ERP in dBk}]) / 20)}) * 1000$

**Equation**  $= 106.92 - (20 * (\text{LOG}_{10}[\text{DistMeters} / 1000])) + [\text{ERP in dBk}]$

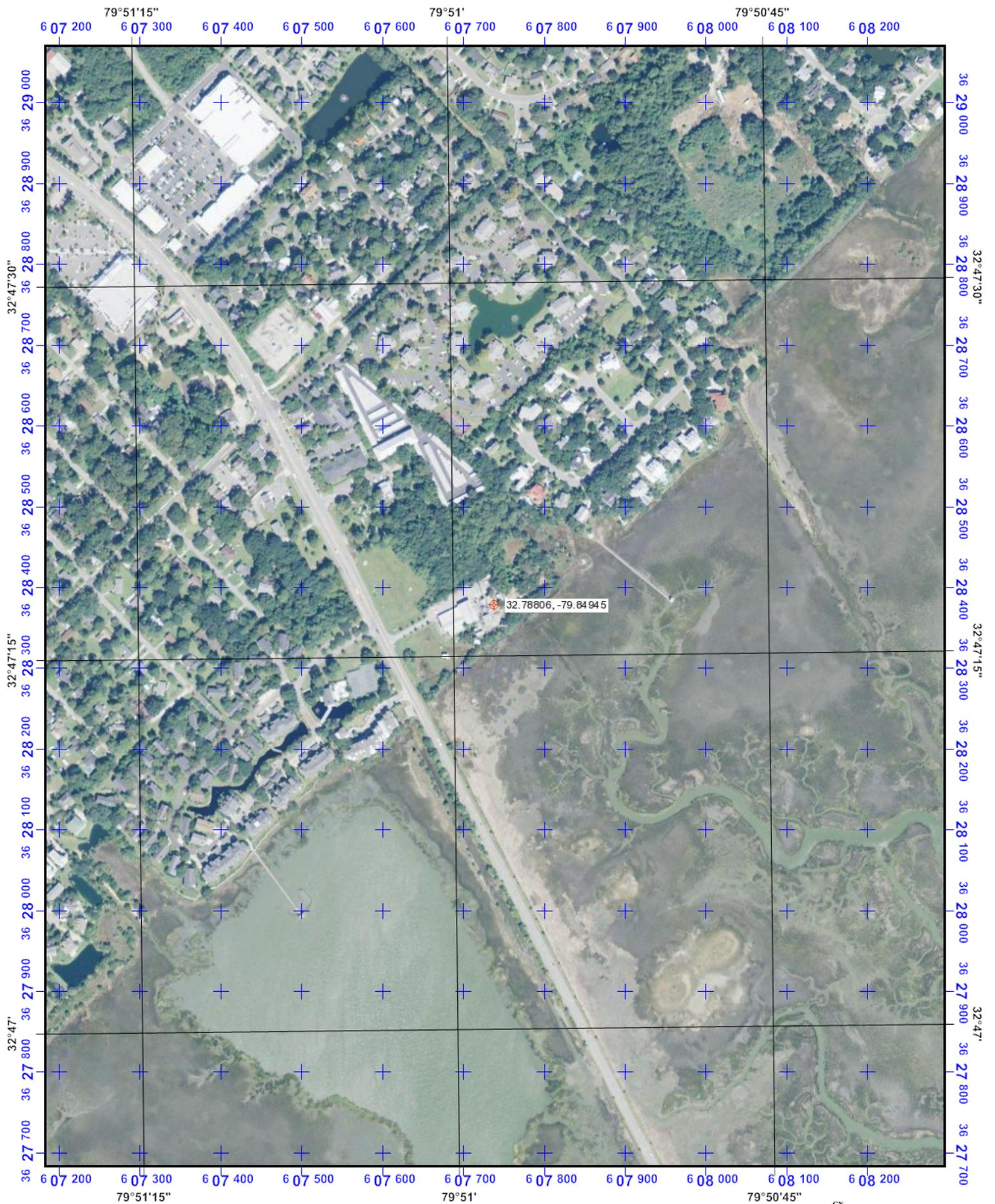
Depression				Distance				
Angle	Antenna			from Ant.	Distance	Field Strength	Distance	Field Strength
Below	Relative	ERP	ERP	to Interf	from Ant. to	in dBu @	from Ant.	in dBu @
Horizon	Field	in kW	in dBk	Contour	Artificial Plane	Artificial Plane	to Ground Level	Ground Level
0°	1.000	0.099	-10.04	247.64 m	infinite	---	infinite	---
-5°	0.997	0.098	-10.07	246.90 m	1904.64 m	91.25 dBu	1962.00 m	91.00 dBu
-10°	0.986	0.096	-10.17	244.17 m	955.96 m	97.15 dBu	984.75 m	96.89 dBu
-15°	0.969	0.093	-10.32	239.96 m	641.37 m	100.46 dBu	660.69 m	100.20 dBu
-20°	0.946	0.089	-10.53	234.27 m	485.35 m	102.67 dBu	499.97 m	102.42 dBu
-25°	0.916	0.083	-10.81	226.84 m	392.79 m	104.23 dBu	404.62 m	103.97 dBu
-30°	0.879	0.076	-11.16	217.67 m	332.00 m	105.33 dBu	342.00 m	105.08 dBu
-35°	0.837	0.069	-11.59	207.27 m	289.41 m	106.10 dBu	298.13 m	105.84 dBu
-40°	0.789	0.062	-12.10	195.39 m	258.25 m	106.58 dBu	266.03 m	106.32 dBu
-45°	0.736	0.054	-12.71	182.26 m	234.76 m	106.80 dBu	241.83 m	106.54 dBu
-50°	0.679	0.046	-13.41	168.15 m	216.70 m	106.80 dBu	223.22 m	106.54 dBu
-55°	0.616	0.038	-14.25	152.55 m	202.65 m	106.53 dBu	208.75 m	106.28 dBu
-60°	0.550	0.030	-15.24	136.20 m	191.68 m	106.03 dBu	197.45 m	105.77 dBu
-65°	0.480	0.023	-16.42	118.87 m	183.16 m	105.24 dBu	188.68 m	104.99 dBu
-70°	0.408	0.016	-17.83	101.04 m	176.65 m	104.15 dBu	181.97 m	103.89 dBu
-75°	0.333	0.011	-19.59	82.46 m	171.86 m	102.62 dBu	177.03 m	102.36 dBu
-80°	0.256	0.006	-21.88	63.40 m	168.56 m	100.51 dBu	173.64 m	100.25 dBu
-85°	0.178	0.003	-25.04	44.08 m	166.63 m	97.45 dBu	171.65 m	97.19 dBu
-90°	0.100	0.001	-30.04	24.76 m	166.00 m	92.47 dBu	171.00 m	92.22 dBu



Universal Transverse Mercator (UTM) Projection Zone 17  
 North American Datum of 1983  
 100 meter UTM / USNG / MGRS  
 Grid Zone Designation: 17S  
 100,000-m Squares: PS



Magnetic declination of 6W at center of map  
 on March 17, 2011



Universal Transverse Mercator (UTM) Projection Zone 17  
 North American Datum of 1983  
 100 meter UTM / USNG / MGRS  
 Grid Zone Designation: 17S  
 100,000-m Squares: PS

