

# Exhibit 13

## Radio Training Network Inc.

P O Box 7217

Lakeland, Fl 33807-7217

### Channel Spacing Report for Channel 271

ComStudy 2.2 search of channel 271 (102.1 MHz Class D)  
at 32-31-45.0 N, 85-01-56.0 W.

CALL	CITY	ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
NEW	PHENIX CITY	AL	271	D	0.00	0.00	90.0	-20.00 dB*
NEW	COLUMBUS	GA	269	D	7.43	0.00	185.1	-13.48 dB**
NEW	COLUMBUS	GA	269	D	7.43	0.00	185.1	-12.86 dB**
WELR-FM	ROANOKE	AL	272	C3	63.87	0.00	333.6	7.94 dB
WHHY-FM	MONTGOMERY	AL	270	C0	110.33	0.00	263.0	11.43 dB
W271BC	LUMPKIN	GA	271	D	55.48	0.00	154.6	14.46 dB
WEBT	LANGDALE	AL	218	A	33.45	10.00	335.9	23.4
WKHX-FM	MARIETTA	GA	268	C0	155.78	0.00	24.2	27.17 dB

\*Short Form app for this Facility.

\*\* See attached Waiver request showing protection of New FMX Ch 269 from Interference.

## **WAIVER REQUEST, SECTION 74.1204**

The proposed FM translator is located within the protected 60dbu contour of new translator application, BNPFT20130820AAS on second adjacent channel 269, Columbus, GA. The predicted F (50-50) field strength of BNPFT20130820AAS at the proposed translator site is 72 dBu or greater. Therefore, the respective interfering contour generated by the proposed FM Translator site is 112 dbu.

Radio Training Network, Inc proposes to use a 1 bay antenna mounted 76 meters above ground. The distance from the antenna to the 112 dBu interference contour is 56 meters and occurs at 20 meters or greater above ground and there are no likely receiver locations in the limited area of predicted interference.

The area surrounding the proposed translator site is forest and single family residential. See the attached aerial photo and topo map included to show the nature of the buildings in the area.

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.



## Audio Division

(202)-418-2700

## FM and TV Propagations Curves Calculations

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[FCC site map](#)

### Results -- FM and TV Propagation Curves Calculations

Free Space equation used, not curves

#### Results of Calculation

**Distance to Contour = 0.056 km**

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#### For input data from Pages 1 and 2:

ERP entered = 0.010 kW

HAAT entered = 78.00 meters

Field Strength entered = 112.000 dBu

Find the Distance to the Contour, Given a Field Strength

F(50,10) curves for interfering contours

FM and NTSC analog TV Channels 2 through 6

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Comments on this program may be referred to [Dale Bickel](#)

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# Phenix City, AL Ch 271

