

Exhibit 13-E Narrative
Section 74.1233(a) Common Overlap
Request for Mattoon Waiver

Radio Training Network, Inc. ("RTN"), licensee of FM translator station K227AO, Channel 227D, Morrisville, MO, hereby respectfully requests the Commission waive section 73.1233(a)(1), requiring overlap between the present and proposed FCC F(50,50) 60 dBu contours of the translator for grant of a minor change application.

The Commission has previously waived Section 74.1223(a)(1)¹ where an applicant has demonstrated that: (1) it does not have a history of filing "serial" minor modification applications; (2) the proposed facility is mutually exclusive to its licensed facility; (3) the proposed move would not foreclose future licensing opportunities in the LPFM service in certain markets, and (4) the translator will rebroadcast an AM station as an AM fill-in translator. K227AO has operated from the current licensed location since the original license was granted on June 12, 2007. RTN has no history of filing "serial" minor modification applications. The proposed K290BU would rebroadcast AM station KWTO(AM), Facility ID No. 35900, 560 kHz, Springfield, Missouri, as an AM fill-in translator. The proposed K227AO facility is mutually exclusive to the K227AO licensed facility. The proposed facility would not affect any licensed LPFM stations or pending LPFM applications. The attached map demonstrates that the proposed K227AO FCC F(50,10) 40 interfering contour does overlap with the proposed K227AO FCC F(50,50) 60 dBu contour. Both facilities specify operation on the same frequency, Channel 227D

¹ *John F. Garziglia, Esq.*, 26 FCC Rcd 12685 (2011) ("*Garziglia*")

The two facilities are mutually exclusive.

Therefore it is believed this proposed modification of K227AO is eligible for a waiver of Section 74.1233(a)(1) of the Commission's rules.

K227AO Appl.

Springfield, MO

Latitude: 37-13-25 N

Longitude: 093-14-30 W

ERP: 0.25 kW

Channel: 227

Frequency: 93.3 MHz

AMSL Height: 599.3 m

Elevation: 424.3 m

Horiz. Pattern: Directional

Vert. Pattern: No

Prop Model: None

K227AO Lic.

Morrisville, MO

BLFT20070514AAZ

Latitude: 37-30-31 N

Longitude: 093-20-42 W

ERP: 0.205 kW

Channel: 227

Frequency: 93.3 MHz

AMSL Height: 382.0 m

Elevation: 354.0 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model: None

Exhibit 13-F Section 74.1233(a) Common Overlap

Request for "Mattoon Waiver"

The K227AO licensed and proposed facilities are mutually exclusive.

