

## Exhibit 13

### Radio Training Network Inc.

P O Box 7217

Lakeland, FL 33807-7217

ComStudy 2.2 search of channel 257 (99.3 MHz Class D) at 35-52-44.0 N, 78-50-57.0 W.

CALL	CITY	ST	CHN-CL	DIST	SEP	BRNG	CLEARANCE
NEW	CHAPEL HILL	NC	260 D	23.21	0.00	289.6	20.54 dB
W254AS	LOUISBURG	NC	254 D	38.41	0.00	57.1	29.54 dB
W255AM	RALEIGH	NC	255 D	18.95	0.00	101.1	23.37 dB
W256AH	CREEDMOOR	NC	256 D	31.51	0.00	22.9	19.46 dB
W256AX	MORRISVILLE	NC	256 D	0.00	0.00	90.0	-17.31 dB *
WCMC-FM	HOLLY SPRINGS	NC	260 C2	36.18	0.00	128.4	-7.76 dB **
WCMC-FM	HOLLY SPRINGS	NC	260 C2	36.18	0.00	128.4	-8.37 dB **
WMAG	HIGH POINT	NC	258 C	104.77	0.00	275.0	28.68 dB
WMAG	HIGH POINT	NC	258 C	89.51	0.00	269.7	0.10 dB
WSLQ	ROANOKE	VA	256 C	187.13	0.00	321.8	26.31 dB
WSLQ	ROANOKE	VA	256 C	187.17	0.00	321.9	25.38 dB
WSMW	GREENSBORO	NC	254 C0	91.76	0.00	274.9	28.99 dB
WSMW	GREENSBORO	NC	254 C0	91.76	0.00	274.9	17.52 dB
WSMW	GREENSBORO	NC	254 C0	91.76	0.00	274.9	5.82 dB
WXDU	DURHAM	NC	204 A	27.13	10.00	310.0	17.1
WZAX	NASHVILLE	NC	257 A	80.90	0.00	84.1	22.28 dB
WZFX	WHITEVILLE	NC	256 C1	127.05	0.00	177.6	29.10 dB
WZFX	WHITEVILLE	NC	256 C1	127.05	0.00	177.6	19.20 dB

\*Licensed site of this facility application

\*\* See attached exhibits and waiver request showing protection of WCMC-FM

## **WAIVER REQUEST, SECTION 74.1204**

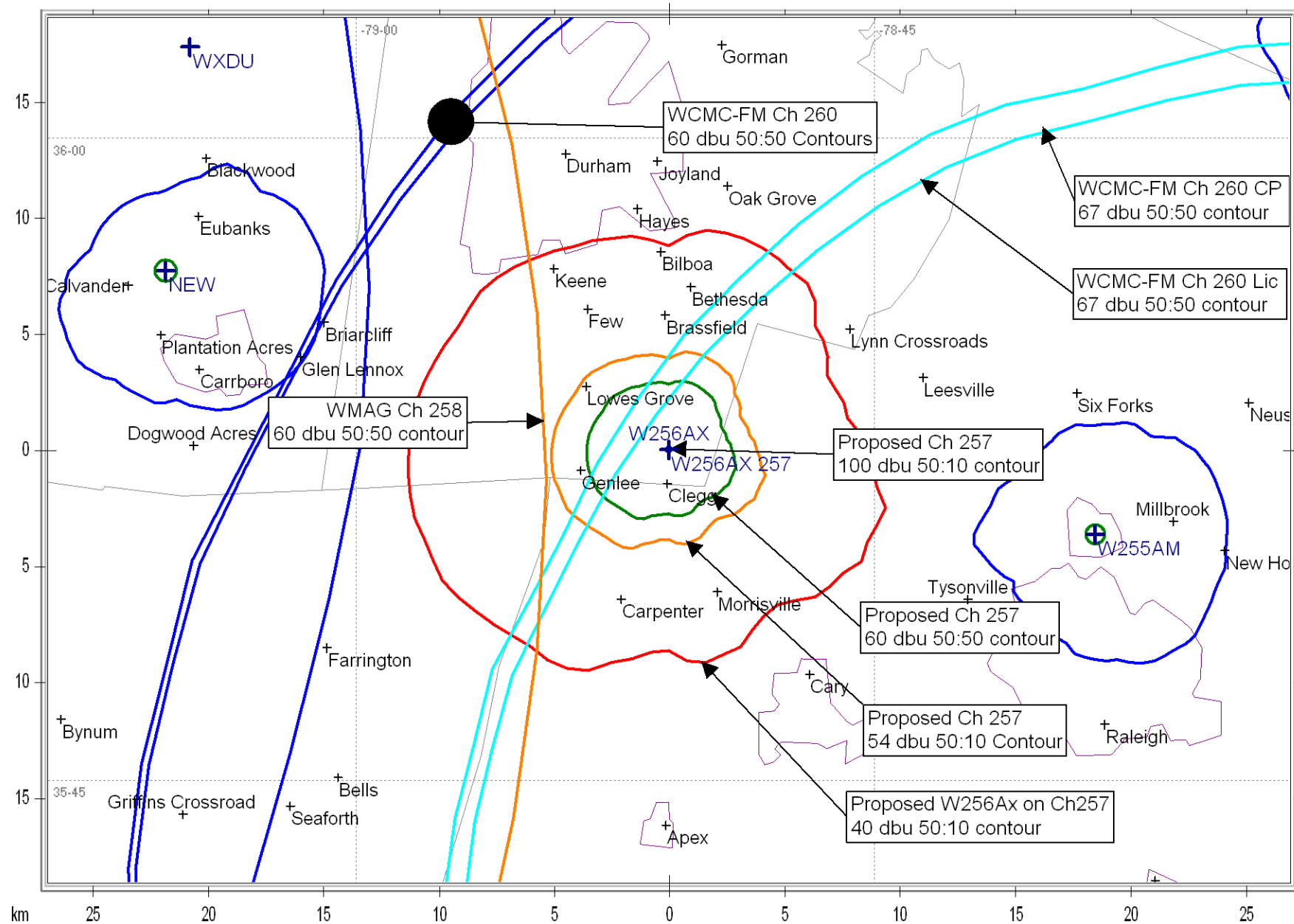
The proposed FM translator is located within the protected 60 dBu contour of station, WCMC-FM on third adjacent channel 260, Holly Springs, NC. The predicted F(50-50) field strength of WCMC-FM at the proposed translator site is 67 dbu or greater from both the Licensed and CP transmitter sites. Therefore, the respective interfering contour generated by the proposed FM Translator site is 107 dbu and extends less than 44 meters from the transmit antenna in the horizontal plane. Radio Training Network Inc. proposes to use a Dielectric DCR-L1 1 bay transmit antenna 41 Meters above ground level. Due to the elevation and reduced downward radiation of the antenna the 107 dbu interfering contour does not reach the ground or any likely receiver locations.

The area surrounding the proposed translator site is industrial and commercial in nature with the tallest buildings within 120 meters of the tower being 1-2 stories tall or about 6 meters. There are no occupied buildings within 44 meters of the tower. See the attached aerial photo included to show the nature of the buildings in the area. Also attached is the vertical radiation pattern of the proposed Dielectric DCR-L1 antenna and a spread sheet that shows that the predicted signal level near the translator site is even less than the 2 watt ERP will produce because of the attenuation of the antenna field at angles below the horizon.

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.

# W256AX Minor Change to Channel 257



## Radio Training Network, Inc

Radio Training Network, Inc. proposes to use a Dielectric 1 bay antenna that has reduced radiation at angles below horizontal. 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.

**0.002 Kilowatts ERP**

**Antenna Make: Dielectric**

**41 Meters AGL to Radiation Center**

**Antenna Model: DCR-L1E**

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

**107 dbu Interfering contour**

Angle	Antenna	ERP	ERP	Distance from	Dist.From Ant.	Field Strength	Dist.From Ant.	Field Strength
Below Horizontal	Rel. Field	Kwatts	DbK	Antenna to Interfering	to Safety Plane	In dbu at	to Ground Level	In Dbu at
						Safety Plane		Ground Level
0	1.000	0.0020	-26.99	44 m	INF m		INF	
5	0.996	0.0020	-27.02	44 m	401.6 m	87.8 dbu	470.4 m	86.4 dbu
10	0.983	0.0019	-27.14	44 m	201.6 m	93.7 dbu	236.1 m	92.3 dbu
15	0.961	0.0018	-27.34	43 m	135.2 m	97.0 dbu	158.4 m	95.6 dbu
20	0.932	0.0017	-27.60	41 m	102.3 m	99.1 dbu	119.9 m	97.7 dbu
25	0.894	0.0016	-27.96	40 m	82.8 m	100.6 dbu	97.0 m	99.2 dbu
30	0.850	0.0014	-28.40	38 m	70.0 m	101.6 dbu	82.0 m	100.2 dbu
35	0.799	0.0013	-28.94	35 m	61.0 m	102.3 dbu	71.5 m	100.9 dbu
40	0.742	0.0011	-29.58	33 m	54.5 m	102.6 dbu	63.8 m	101.2 dbu
45	0.681	0.0009	-30.33	30 m	49.5 m	102.7 dbu	58.0 m	101.3 dbu
50	0.615	0.0008	-31.21	27 m	45.7 m	102.5 dbu	53.5 m	101.1 dbu
55	0.547	0.0006	-32.23	24 m	42.7 m	102.1 dbu	50.1 m	100.7 dbu
60	0.477	0.0005	-33.42	21 m	40.4 m	101.4 dbu	47.3 m	100.0 dbu
65	0.407	0.0003	-34.80	18 m	38.6 m	100.4 dbu	45.2 m	99.0 dbu
70	0.338	0.0002	-36.41	15 m	37.2 m	99.1 dbu	43.6 m	97.7 dbu
75	0.272	0.0001	-38.30	12 m	36.2 m	97.4 dbu	42.4 m	96.1 dbu
80	0.210	0.0001	-40.55	9 m	35.5 m	95.4 dbu	41.6 m	94.0 dbu
85	0.157	0.0000	-43.07	7 m	35.1 m	92.9 dbu	41.2 m	91.6 dbu
90	0.120	0.0000	-45.41	5 m	35.0 m	90.6 dbu	41.0 m	89.3 dbu

Formulas used

Distance to Contour =

Field Strength=

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

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



Exhibit No.

Date  
Call Letters  
Location  
Customer  
Antenna Type

05 Aug 2011

Channel 257

DCR-L1E

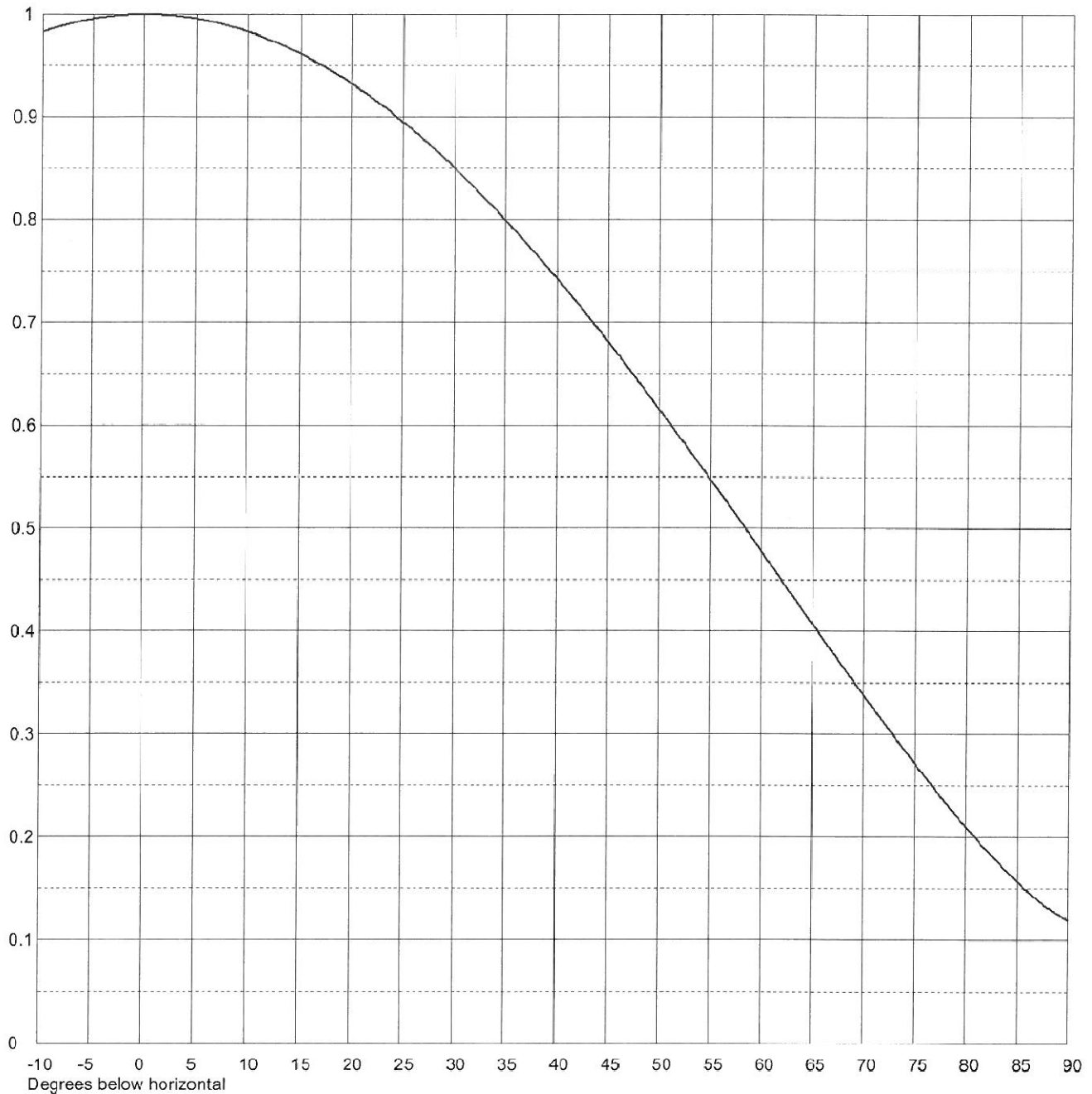
**ELEVATION PATTERN**

RMS Gain at Main Lobe  
RMS Gain at Horizontal  
Calculated / Measured

**0.5 (-3.01 dB)**  
**0.5 (-3.01 dB)**  
**Calculated**

Beam Tilt  
Frequency  
Drawing #

**0.00 Degrees**  
**99.30 MHz**  
**FE01L0000092000-90**



Remarks:



Exhibit No.

Date **05 Aug 2011**

Call Letters

Channel **257**

Location

Customer

Antenna Type **DCR-L1E****TABULATION OF ELEVATION PATTERN**Elevation Pattern Drawing # **FE01L0000092000-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.983	2.4	0.999	10.6	0.981	30.5	0.845	51.0	0.602	71.5	0.318
-9.5	0.984	2.6	0.999	10.8	0.980	31.0	0.840	51.5	0.595	72.0	0.311
-9.0	0.986	2.8	0.999	11.0	0.979	31.5	0.835	52.0	0.588	72.5	0.305
-8.5	0.987	3.0	0.998	11.5	0.977	32.0	0.830	52.5	0.582	73.0	0.298
-8.0	0.989	3.2	0.998	12.0	0.975	32.5	0.825	53.0	0.575	73.5	0.291
-7.5	0.990	3.4	0.998	12.5	0.973	33.0	0.820	53.5	0.568	74.0	0.285
-7.0	0.991	3.6	0.998	13.0	0.971	33.5	0.815	54.0	0.561	74.5	0.278
-6.5	0.993	3.8	0.997	13.5	0.969	34.0	0.810	54.5	0.554	75.0	0.272
-6.0	0.994	4.0	0.997	14.0	0.966	34.5	0.804	55.0	0.547	75.5	0.265
-5.5	0.995	4.2	0.997	14.5	0.964	35.0	0.799	55.5	0.540	76.0	0.259
-5.0	0.996	4.4	0.997	15.0	0.961	35.5	0.794	56.0	0.533	76.5	0.253
-4.5	0.996	4.6	0.996	15.5	0.959	36.0	0.788	56.5	0.526	77.0	0.247
-4.0	0.997	4.8	0.996	16.0	0.956	36.5	0.783	57.0	0.519	77.5	0.240
-3.5	0.998	5.0	0.996	16.5	0.953	37.0	0.777	57.5	0.512	78.0	0.234
-3.0	0.998	5.2	0.995	17.0	0.950	37.5	0.771	58.0	0.505	78.5	0.228
-2.8	0.999	5.4	0.995	17.5	0.947	38.0	0.766	58.5	0.498	79.0	0.222
-2.6	0.999	5.6	0.995	18.0	0.944	38.5	0.760	59.0	0.491	79.5	0.216
-2.4	0.999	5.8	0.994	18.5	0.941	39.0	0.754	59.5	0.484	80.0	0.210
-2.2	0.999	6.0	0.994	19.0	0.938	39.5	0.748	60.0	0.477	80.5	0.205
-2.0	0.999	6.2	0.993	19.5	0.935	40.0	0.742	60.5	0.470	81.0	0.199
-1.8	0.999	6.4	0.993	20.0	0.932	40.5	0.736	61.0	0.463	81.5	0.193
-1.6	1.000	6.6	0.992	20.5	0.928	41.0	0.730	61.5	0.456	82.0	0.188
-1.4	1.000	6.8	0.992	21.0	0.925	41.5	0.724	62.0	0.449	82.5	0.182
-1.2	1.000	7.0	0.991	21.5	0.921	42.0	0.718	62.5	0.442	83.0	0.177
-1.0	1.000	7.2	0.991	22.0	0.918	42.5	0.712	63.0	0.435	83.5	0.172
-0.8	1.000	7.4	0.990	22.5	0.914	43.0	0.706	63.5	0.428	84.0	0.167
-0.6	1.000	7.6	0.990	23.0	0.910	43.5	0.700	64.0	0.421	84.5	0.162
-0.4	1.000	7.8	0.989	23.5	0.906	44.0	0.693	64.5	0.414	85.0	0.157
-0.2	1.000	8.0	0.989	24.0	0.902	44.5	0.687	65.0	0.407	85.5	0.152
0.0	1.000	8.2	0.988	24.5	0.898	45.0	0.681	65.5	0.400	86.0	0.148
0.2	1.000	8.4	0.988	25.0	0.894	45.5	0.674	66.0	0.393	86.5	0.143
0.4	1.000	8.6	0.987	25.5	0.890	46.0	0.668	66.5	0.386	87.0	0.139
0.6	1.000	8.8	0.987	26.0	0.886	46.5	0.662	67.0	0.379	87.5	0.135
0.8	1.000	9.0	0.986	26.5	0.882	47.0	0.655	67.5	0.372	88.0	0.131
1.0	1.000	9.2	0.985	27.0	0.877	47.5	0.649	68.0	0.366	88.5	0.128
1.2	1.000	9.4	0.985	27.5	0.873	48.0	0.642	68.5	0.359	89.0	0.125
1.4	1.000	9.6	0.984	28.0	0.869	48.5	0.635	69.0	0.352	89.5	0.122
1.6	1.000	9.8	0.983	28.5	0.864	49.0	0.629	69.5	0.345	90.0	0.120
1.8	0.999	10.0	0.983	29.0	0.859	49.5	0.622	70.0	0.338		
2.0	0.999	10.2	0.982	29.5	0.855	50.0	0.615	70.5	0.331		
2.2	0.999	10.4	0.981	30.0	0.850	50.5	0.609	71.0	0.325		

Remarks: