

## Exhibit 16.1

# COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

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The RF Compliance Study for K227AN.p, Lynd, MN, has been evaluated for human exposure to non-ionizing radiofrequency radiation at the transmitter site. The site will house multiple transmitters. The potential for human exposure to non-ionizing radiofrequency radiation at the proposed transmitter site has been evaluated with regards to §1.1307(b)(3) concerning the five percent (5%) contribution rule for multiple transmitter sites.

The proposed facility will operate on 93.3 MHz with a maximum effective radiated power (ERP) of 0.140 kW circular polarization. The facility will operate with a two element antenna mounted 49 meters above ground level (AGL). The proposed antenna will be a Jampro JLST-2. Worst case EPA type 1 elements as defined from FCC program FM Model Version 2.10b have been employed.

This site has been evaluated for compliance with the FCC guidelines concerning human exposure to radiofrequency radiation. The standards employed are detailed in OET Bulletin No. 65 (Edition 97-01). Software packages were used to determine the individual contribution of the station. FM radiofrequency radiation levels were predicted using both the array pattern, the calculations of which are based on the number of bays in the antenna and wavelength spacing between the bays, and the element pattern. The element pattern is determined by using measured element data prepared by the EPA and published in "An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM and TV Services," by Paul C. Gailey and Richard Tell - April 1985, U.S. Environmental Protection Agency, Las Vegas, NV. The programs use formulas that were originally published in OST Bulletin No. 65, 1985.

The result of the evaluations for the station is shown in both graphical and tabular forms at the end of this report. The tabulation lists the portion of the tabular output for the station showing the region of maximum radiofrequency radiation. The locations of maximum predicted power density have been highlighted using ***bold italic*** type. The FM graphical display has been scaled to show the best definition of the data curve.

To evaluate the total exposure to non-ionizing radio-frequency radiation with regards to the five percent contribution exclusion rule, it is necessary to express the individual contribution as a decimal fraction of the maximum permissible limit. If the resulting contribution is less than or equal to 5.0%, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01) and §1.1307(b)(3). Protection of the more restrictive uncontrolled limit implies protection of the controlled limit.

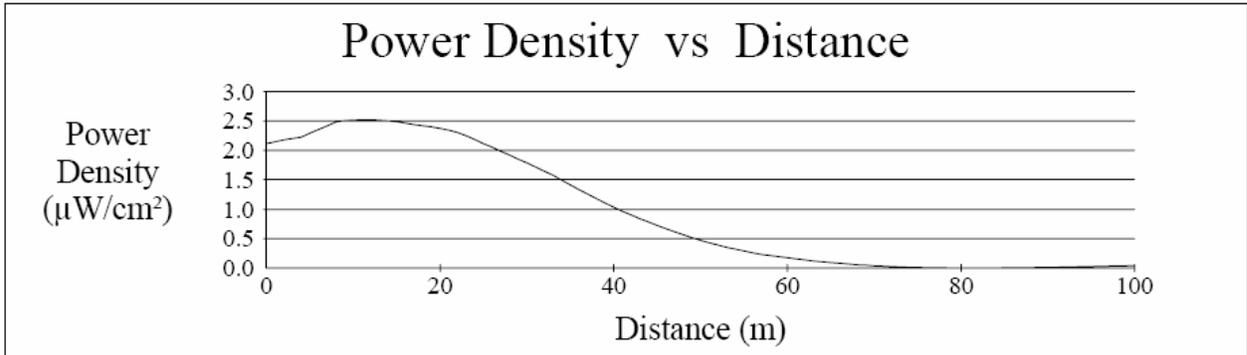
<b><u>Contributing Station</u></b>	<b><u>Maximum Contribution</u></b>	<b><u>Uncontrolled Environment Limit</u></b>	<b><u>Decimal Fraction of Limit</u></b>
K227AN.p	2.5210 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	0.012605
	<b>Total Contribution Percent</b>		<b>1.2605%</b>

Since the maximum contribution for the uncontrolled environments is less than the 0.05 (5.0%) as set for by §1.1307(b)(3), the facility is in compliance with FCC guidelines. §1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where its contribution is less than five percent. Since this instant application meets the five percent exclusion test at all ground level areas, the impact of the proposed facility may be considered independently from other facilities operating at or nearby this site. It is believed the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b)(3).

In addition to the protection afforded by the proposed antenna height above ground, the facility is properly marked with signs, and entry to the facility is restricted by means of fencing with locked doors and/or gates. Any other means that may be required to protect employees and the general public will be employed.

In the event work is required in proximity to the antenna(s) such that the person or persons working in the area will be potentially exposed to fields in excess of the current guidelines, an agreement signed by all broadcast parties at the site will be in effect for the offending transmitter(s) to reduce power, or cease operation during the critical period.

**PLOT OF TOTAL POWER DENSITY**  
**K227AN.p – Lynd, MN**  
**Using a 2-Bay EPA Type 1 Antenna Mounted 49 meters AGL**



Distance (meters)	= 100	Vertical ERP (W)	= 140
Horizontal ERP (W)	= 140	Antenna Type	= 1 (EPA)
Antenna Height (m)	= 49	Element Spacing	= 1
Number of Elements	= 2	X-axis Setup	= -1, 100
Y-axis (Linear)	= -1		

X (m)	Y (µW/cm²)	X (m)	Y (µW/cm²)	X (m)	Y (µW/cm²)	X (m)	Y (µW/cm²)
0	2.1174	26	2.0502	52	.39131	78	2.7043E-03
1	2.1471	27	1.9807	53	.35443	79	1.3060E-03
2	2.1749	28	1.9171	54	.32010	80	4.3172E-04
3	2.2009	29	1.8525	55	.28823	81	3.4884E-05
4	2.2248	30	1.7860	56	.25870	82	7.2092E-05
5	2.2886	31	1.7179	57	.23552	83	5.0354E-04
6	2.3557	32	1.6486	58	.21356	84	1.2926E-03
7	2.4204	33	1.5773	59	.19279	85	2.4050E-03
8	2.4822	34	1.4942	60	.17321	86	3.8086E-03
9	2.5075	35	1.4125	61	.15483	87	5.4735E-03
10	2.5158	36	1.3326	62	.13764	88	7.3716E-03
11	2.5203	37	1.2546	63	.12163	89	9.4767E-03
<b>12</b>	<b>2.5210</b>	38	1.1787	64	.10679	90	.01176
13	2.5154	39	1.1050	65	.09308	91	1.4213E-02
14	2.5023	40	1.0348	66	.08049	92	1.6800E-02
15	2.4850	41	.96763	67	6.8983E-02	93	1.9508E-02
16	2.4634	42	.90286	68	5.7948E-02	94	2.2317E-02
17	2.4375	43	.84060	69	4.8064E-02	95	2.5212E-02
18	2.4200	44	.78090	70	3.9343E-02	96	2.8177E-02
19	2.3990	45	.72382	71	3.1707E-02	97	.03119
20	2.3731	46	.66938	72	.02508	98	3.4262E-02
21	2.3422	47	.61759	73	1.9392E-02	99	.03735
22	2.3048	48	.56644	74	1.4570E-02	100	4.0473E-02
23	2.2453	49	.51832	75	1.0551E-02		
24	2.1828	50	.47316	76	7.2732E-03		
25	2.1177	51	.43085	77	4.6759E-03		