

## **EXHIBIT 20.1**

### **RADIOFREQUENCY RADIATION GUIDELINES COMPLIANCE STUDY**

This instant application has been evaluated for potential of human exposure to non-ionizing radiofrequency radiation. The guidelines set forth in OET Bulletin No. 65 (Edition 97-01) and the companion Supplement A (Edition 97-01) were used as the standard for this evaluation

The proposed 1460 kHz WPON facility will operate with a daytime power of 0.670 kW utilizing a four tower array and a nighttime power of 0.580 kW utilizing a separate three tower array. All towers will employ radiating elements  $104.1^\circ$  in electrical length or  $0.289 \lambda$  (wavelengths) for operation on 1460 kHz.

The collocated authorized 1160 kHz WCXI facility will operate with a daytime power of 15.0 kW into a three tower array, and a nighttime power of 215 watts into a two tower array. All towers will employ radiating elements  $82.8^\circ$  in electrical length or  $0.230 \lambda$  (wavelengths) for operation on 1160 kHz.

For purposes of this study, the combined worst case daytime power of 15.670 kW has been assumed to be present in each tower regardless of frequency.

Table 2 of Supplement A specifies for 0.21-0.4 wavelength AM towers operating on 1460 kHz or 1160 kHz with a total input power of 50.0 kW or less, the non-ionizing radiation will fall to safe levels at distances of at least 4.0 meters (13.1 feet) or more. This application proposes fencing of no less than 4 meters from the base of each tower.

Access to areas within the fences will be limited by means of locked gates. In addition to these measures, signs will also be posted warning of the potential for exposure to excessive levels of non-ionizing radiofrequency radiation.

In the event maintenance personnel are required to work within the restricted areas, they will be advised to limit their work in the high RF field areas to specified periods of time appropriate for compliance with the FCC guidelines set forth in OET Bulletin No. 65 (Edition 97-01). If their work cannot be completed within the specified period of time, it is proposed to reduce power appropriately or shut down the operation of the station to permit completion of the assignment. There are no additional sources of radiofrequency radiation subject to the guidelines of OET Bulletin No. 65 (Edition 97-01) at this location.