

Exhibit 16.1

COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

This firm was retained to study the potential for human exposure to non-ionizing radiofrequency radiation at the common site of this proposed CH221D translator (formerly W275BH) and WXRV(FM), Andover, MA and WCEC(AM), Haverhill, MA. There are no other contributing services located within 315 meters of the common site.

The proposed translator facility will operate on CH221D, 91.9 MHz with a maximum effective radiated power (ERP) of 0.150 kW horizontal only polarization. The facility will operate with no less than a one (1) bay horizontal antenna mounted 6 meters above ground level (AGL). The spacing for the element will be 1.0λ (wavelength). The antenna will employ an EPA type 1 element as defined from FCC program FM Model Version 2.10b.

The WXRV(FM) facility operates on CH223B, 92.5 MHz with a maximum effective radiated power (ERP) of 25.0 kW circular polarization. The facility operates with a three (3) bay Harris FMXH-3AE antenna mounted 177 meters above ground level (AGL). The spacing for the element is notified as 1.0λ (wavelengths). The antenna employs an EPA type 3 elements as defined in FCC program FM Model Version 2.10b.

WCEC(AM) operates on a frequency of 1490 kHz with a daytime/nighttime unlimited non- directional power of 1.0 kW. The common vertical radiator for WCEC(AM) is 132.5° or 0.368λ (wavelengths) for operation on 1490 kHz.

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 each station. A software package designed for use with AM stations (under the previous OST Bulletin No. 65, October 1985) was used to determine the contribution of this facility to the non-ionizing radiofrequency radiation present at this site. This program bases its calculations on data found in Figures 1, 2, and 3 of Appendix D of OST Bulletin No. 65, October 1985. FM non-ionization 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 which is determined by using measured element data prepared by the E.P.A. 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 results of the evaluations for all stations are shown in both graphical and tabular forms at the end of this report. The tabular form lists the portion of the tabular output for each station, showing the region of maximum non-ionizing radiation. (The maximum values have been indicated by the use of **highlighted print**.) For the AM facility, the maximum contribution has been assumed using the common day/night power of 1.0 kW at a distance of 1 meter from the base of the tower. The tabulation of AM data use the units of measurement, V^2/m^2 and A^2/m^2 , which were used in the previous standards as set forth in OST Bulletin No. 65, October 1985.

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Inspection of the tabulations will show that the maximum contribution of WCEC(AM) at the AM tower is made by the magnetic field. At the 1 meter point, the field has a predicted value of 0.1010 A²/m², or 0.3178 A/m, which represents 21.62% of the more stringent 1.4698 A/m uncontrolled limit. The maximum exposure to non-ionizing radiation from the FM operations are predicted without regard to distance from the tower and based on the more stringent 200.0 µW/cm² uncontrolled limit.

To evaluate the total exposure to non-ionizing radiofrequency radiation it is necessary to sum the individual contributions as a decimal fraction of the maximum permissible limit. If the resulting sum is less than or equal to unity, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01). The table that follows provides the same information with respect to those locations defined as an "uncontrolled environment." This includes locations where there could be exposure to the general public. The total decimal fraction is also shown.

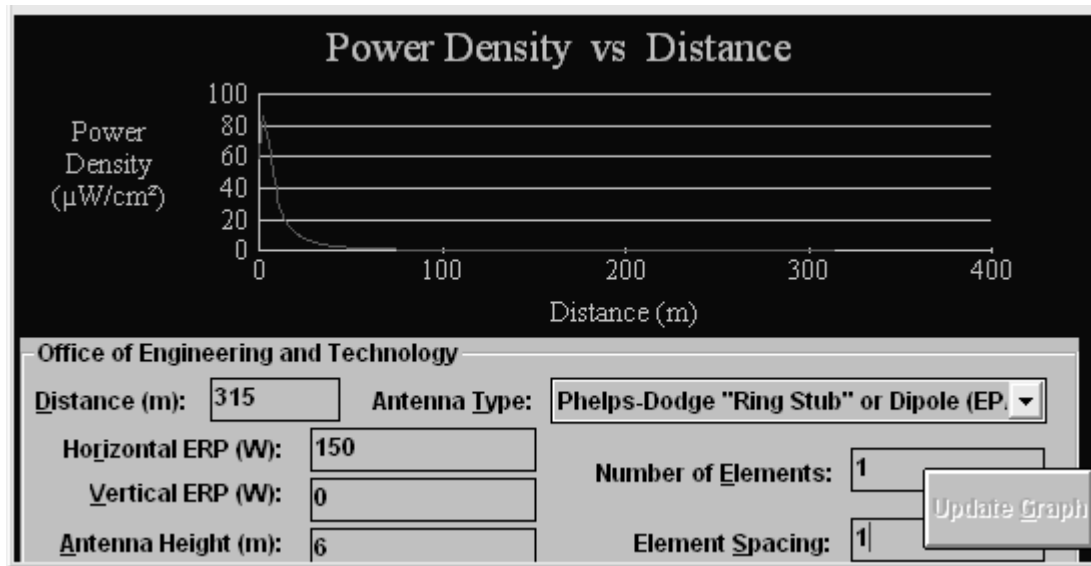
<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Environment Limit</u>	<u>Decimal Fraction of Limit</u>
CH221D proposed	85.7759 µW/cm ²	200 µW/cm ²	0.42880
WXRV(FM)	5.7187 µW/cm ²	200 µW/cm ²	0.02859
WCEC(AM)	0.3178 A/m	1.4698 A/m	<u>0.21622</u>
Total Decimal Fraction			0.67361

Since the Total Decimal Fraction is less than unity for the uncontrolled environment, the operation of the combined transmitting plants is in compliance with the provisions of OET Bulletin No. 65 (Edition 97-01). Protection of the uncontrolled environment implies protection of the controlled environment. There are no other broadcast sources of radiofrequency non-ionizing radiation present at this site.

In addition to the protection afforded by the existing AM fencing and the FM antenna heights 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 as may be required to protect employees and the general public will be employed.

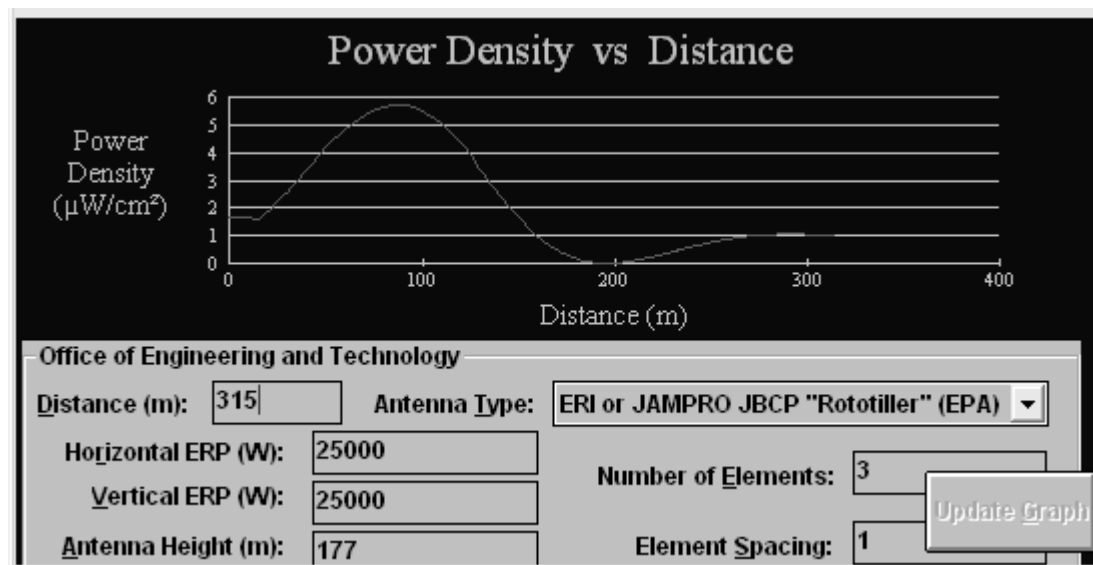
In the event work would be required in proximity to the antenna such that the person or persons working in the area would be potentially exposed to fields in excess of FCC guidelines, an agreement, signed by all broadcast parties at the site, is in effect for the offending transmitter(s) to reduce power,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

PLOT AND TAB OF TOTAL POWER DENSITY CH221D – (Formerly W275BH) – Newton, NH



The Max Power Density was found to be 85.7759113482009 $\mu\text{W}/\text{cm}^2$ at 2 meters.

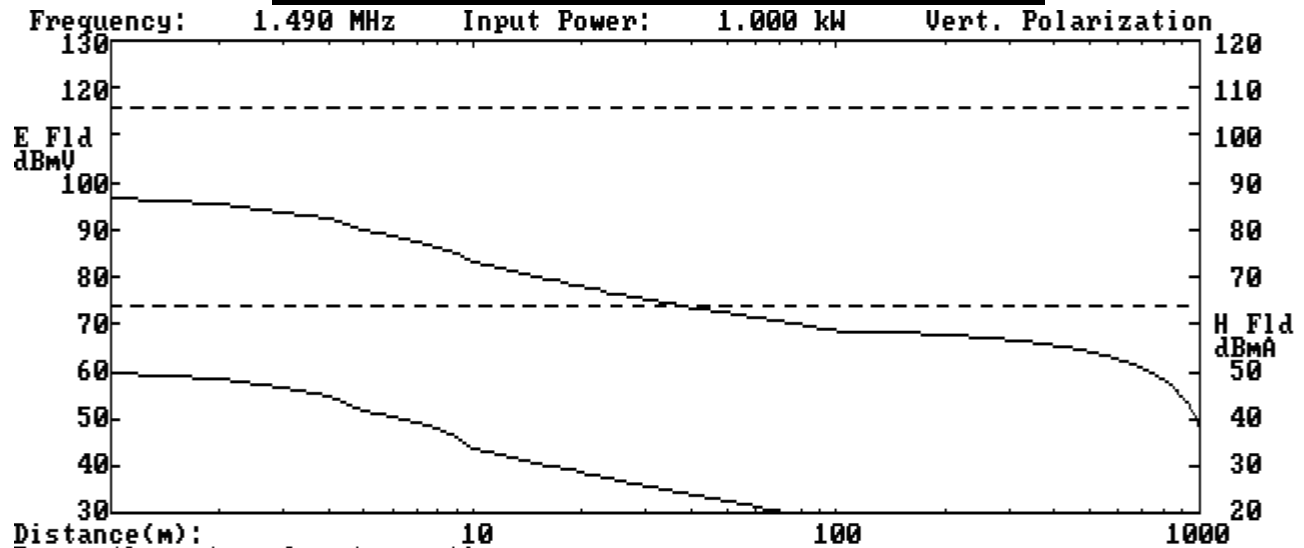
PLOT AND TAB OF TOTAL POWER DENSITY WXRV(FM) – Channel 223B – Andover, MA



The Max Power Density was found to be 5.71865896061536 $\mu\text{W}/\text{cm}^2$ at 88 meters.

PLOT AND TAB OF ELECTRIC AND MAGNETIC FIELD STRENGTHS

WCEC(AM) – 1490 kHz – Haverhill, MA



Summary of Input Data: WCEC(AM) Frequency: 1.490 MHz
Horizontal Input Power : .000 kW Vertical Input Power : 1.000 kW
Antenna Type: AM NON-D
Horizontal Element Type Number: 0. Vertical Element Type Number: 1.
Height of observer above reference plane: 2.0 Meters

Element Data: Vertical Number of elements: 1
Distance from analysis reference point: .0 meters
Azimuth from analysis reference point: N .0 E
Height of tower above reference plane: 132.5 Degrees

Element Number	Distance From Center (wavelengths)	Relative Power	Relative Phase
1.	.00	1.000	.0

Distance (meters)	Horizontal Polarization		Vertical Polarization		Total Power Density (mW/cm2)
	E2 Field (V2/m2)	H2 Field (A2/m2)	E2 Field (V2/m2)	H2 Field (A2/m2)	
1.00	0.	.0000	4443.	.1010	2.1185
2.00	0.	.0000	3340.	.0720	1.5512
3.00	0.	.0000	2394.	.0480	1.0716
4.00	0.	.0000	1605.	.0288	.6795
5.00	0.	.0000	973.	.0145	.3750
6.00	0.	.0000	770.	.0112	.2941
7.00	0.	.0000	591.	.0084	.2229
8.00	0.	.0000	436.	.0060	.1616
9.00	0.	.0000	304.	.0040	.1101
10.00	0.	.0000	196.	.0024	.0684
11.00	0.	.0000	173.	.0021	.0605
12.00	0.	.0000	153.	.0019	.0532
13.00	0.	.0000	133.	.0016	.0463
14.00	0.	.0000	115.	.0014	.0398
15.00	0.	.0000	98.	.0012	.0339
16.00	0.	.0000	90.	.0011	.0312
17.00	0.	.0000	83.	.0010	.0287
18.00	0.	.0000	76.	.0009	.0262
19.00	0.	.0000	69.	.0008	.0239
20.00	0.	.0000	62.	.0008	.0217

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