

## Exhibit 35.1

### Compliance with Radiofrequency Radiation Guidelines

The potential for human exposure to non-ionizing radiofrequency radiation at the common KKEQ(FM) – Fosston, MN (proposed) and KKCQ-FM – Bagley, MN (proposed) transmitter site has been evaluated. There are no other sources of RF Radiation located within 315 meters of the common site.

The KKEQ(FM) – Fosston, MN analog FM facility will operate on CH296C1 (107.1 MHz) with 64.0 kW ERP circular polarization (H&V). The facility will broadcast with an antenna COR mounted 142 meters above ground level (AGL). KKEQ(FM) will operate with a six bay 1.0  $\lambda$  (wavelength) spaced, ERI SHPX-6AC “roto-tiller” antenna employing EPA Type 3 elements as defined by FM Model Version 2.10 Beta issued March 22, 1995. KKEQ(FM) will not operate with HD/IBOC facilities at this time.

The KKCQ-FM – Bagley, MN analog FM facility will operate on CH244C2 (96.7 MHz) with 25.0 kW ERP circular polarization (H&V). The facility will broadcast with an antenna COR mounted 124 meters above ground level (AGL). KKCQ-FM will operate with a six bay 1.0  $\lambda$  (wavelength) spaced, ERI SHPX-6AC “roto-tiller” antenna employing EPA Type 3 elements as defined by FM Model Version 2.10 Beta issued March 22, 1995. KKCQ-FM will not operate with HD/IBOC facilities at this time.

Software packages were used to determine the individual contribution of each 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. Both FM and TV programs use formulas were originally published in OST Bulletin No. 65, 1985.

To evaluate the total exposure to non-ionizing radio-frequency 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 100%, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01). To simplify the calculations and produce a “worst case” study, the maximum exposure level produced by each station has been selected without regard to the location of that exposure. The following table is based on the uncontrolled limits set forth in OET Bulletin No. 65 (Edition 97-01).

<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Limit</u>	<u>% of Limit</u>
KKEQ(FM) (analog)	14.8935 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	7.45%
KKCQ-FM (analog)	7.6612 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	<u>3.83%</u>
		<b>Total % of Limit</b>	<b>11.28%</b>

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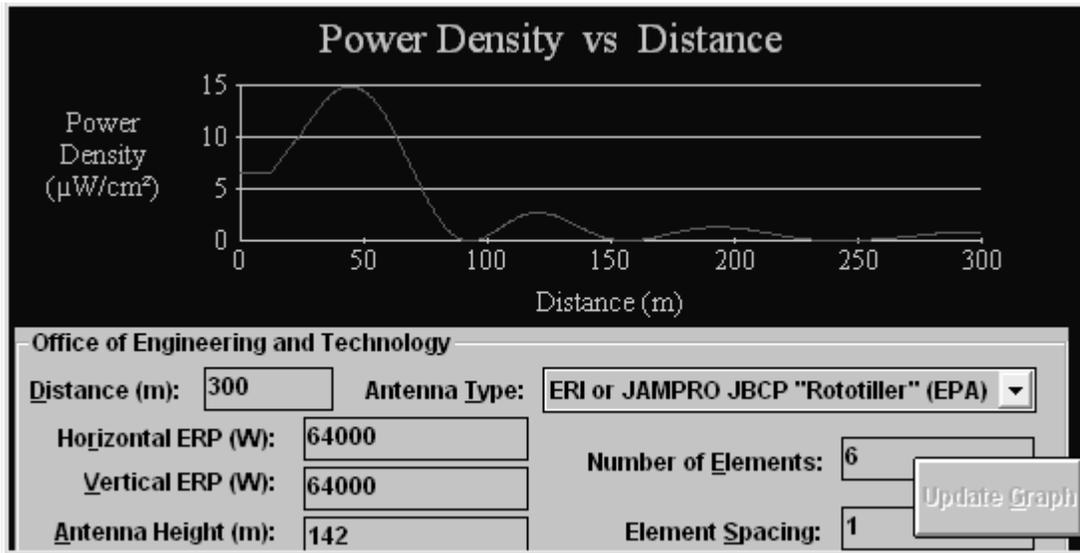
With the implementation of OET Bulletin No. 65 (Edition 97-01) and the accompanying Supplement A (Edition 97-01), the Commission set forth new guidelines for human exposure to radiofrequency radiation that employ a two-tiered system. The more lenient set of guidelines are for the “controlled environments”, which are defined as “locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment, by other cognizant persons, or as the incidental result of transient passage through areas where analysis shows the exposure levels may be above...” the more restrictive guidelines but below the more lenient guidelines. The second, more restrictive, set of guidelines is to be applied to “uncontrolled environments” which are defined as “locations where there is the exposure of individuals who have no knowledge or control of their exposure.” The table above sets forth an evaluation of the transmitter site based on the standards for “uncontrolled environments.”

Since the Total % of the Limit is less than 100% of the more stringent uncontrolled environment guidelines, the proposed installation will comply with the current FCC guidelines.

In addition to the protection afforded by the proposed 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 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.

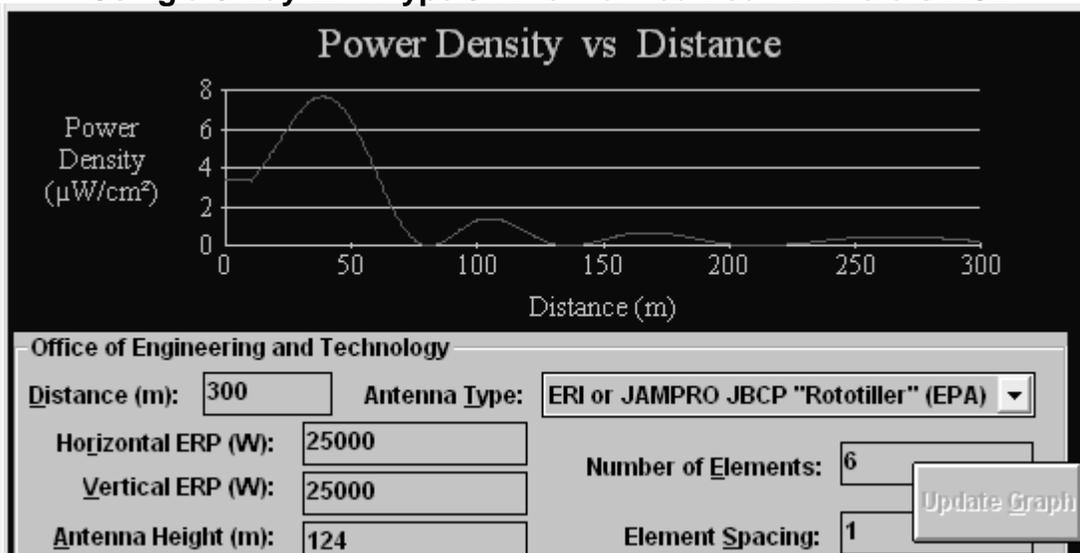
**PLOT OF TOTAL POWER DENSITY**  
**KKEQ(FM) – Fosston, MN (analog) Operation**  
**Using a 6-Bay EPA Type 3 Antenna Mounted 142 meters AGL**



The Max Power Density was found to be 14.8934769377504  $\mu\text{W}/\text{cm}^2$  at 44.4 meters.

Note: Graph resolution is 500 points.

**PLOT OF TOTAL POWER DENSITY**  
**KKCQ-FM – Bagley, MN (analog) Operation**  
**Using a 6-Bay EPA Type 3 Antenna Mounted 124 meters AGL**



The Max Power Density was found to be 7.66117682998436  $\mu\text{W}/\text{cm}^2$  at 39 meters.

Note: Graph resolution is 500 points.