

Exhibit 20.1

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 WGTO(AM) modification and FM Translator station W266BS both licensed to Cassopolis, MI. There are no other contributing services located within 315 meters of the common site.

W266BS operates on Channel 266D with 0.250 kW ERP (vertical only polarization). The facility operates with a one bay Nicom BKY3/P antenna mounted 80 meters above ground level (AGL). The spacing for the element will be 1.0λ (wavelength). For purposes of this study worst case EPA type 1 element as defined by FCC program FM Model Version 2.10b1 has been assumed.

WGTO(AM) operates on a frequency of 910 kHz with a proposed daytime directional power of 3.0 kW and nighttime directional power of 0.026 kW. Both modes of operation employ the same two tower array. Both vertical radiators for WGTO(AM) are 90.0° or 0.250λ (wavelengths) for operation on 910 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 higher daytime power of 3.0 kW at maximum field in each tower, however the present fencing is or will be built to a distance no less than 2.0 meters for either 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.

Inspection of the tabulations will show that the maximum contribution of WGTO(AM) at the AM tower is made by the magnetic field. At this point, the field has a predicted value of $0.5848 A^2/m^2$, or $0.7647 A/m$, which represents 46.91% of the more stringent $1.63 A/m$ uncontrolled limit. The maximum exposure to non-ionizing radiation from the FM operation will be $1.3085 \mu W/cm^2$ without regard for distance from the tower. This contribution is less than 1% of the more stringent $200.0 \mu W/cm^2$ 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.

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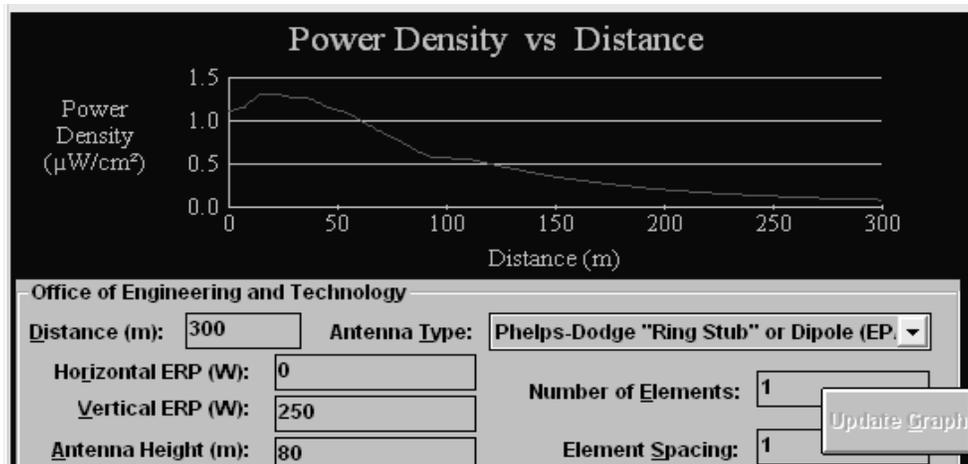
<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Environment Limit</u>	<u>Decimal Fraction of Limit</u>
W266BS	1.3085 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	0.0065
WGTO(AM)	0.7647 A/m	1.63 A/m	<u>0.4691</u>
		Total Decimal Fraction:	0.4756

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 W266BS – Channel 266D – Cassopolis, MI



The Max Power Density was found to be 1.30849920455003 $\mu\text{W}/\text{cm}^2$ at 18 meters.

Note: Graph resolution is 300 points.

