

## **Exhibit 19.1**

### **Radiofrequency Radiation Guidelines Compliance Study**

The instant application has been evaluated for potential of human exposure to non-ionizing radio frequency radiation. The guidelines set forth in OET Bulletin No. 65, August 1997, were used as the standard for this evaluation.

The proposed WDAY(AM) facility will employ a new three tower array. Daytime operation will employ 10.0 kW with a two tower array, while nighttime operation will employ 10.0 kW with a three tower array. The two daytime towers will be common to the nighttime array. Each tower employs a radiating element length of 90° or 0.250 wavelengths for operation on 970 kHz.

Review of OET Bulletin No. 65, Supplement A, Section 1, Table 2 specifies that for 0.21-0.4 wavelength AM towers with an input power of 10.0 kW or less, the non-ionizing radiation will fall to safe levels at distances of 2 meters (6.6 feet) or more.

Fencing will be constructed meeting or exceeding this 2 meter (6.6 ft) level of protection. Access to area within the fences will be limited by means of locked gates. In addition to these measures, signs will be posted warning of the potential for exposure to excessive levels of non-ionizing radio frequency radiation.

In the event maintenance personnel are required to work within the restricted area, they will be advised to limit their work in the high RF field area to specified periods of time appropriate for compliance with the ANSI guidelines set forth in OET Bulletin No. 65, August 1997. 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 non-ionizing radiation subject to the guidelines of OET Bulletin No. 65 at this location.