

EXHIBIT 16.1

COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

The potential for human exposure to non-ionizing radiofrequency radiation at the proposed transmitter site has been evaluated. In addition to the proposed FM Booster operation of KLMP(FM) on Channel 250D, the transmitter site will also be shared with two (2) other proposed FM facility and five (5) other TV facilities currently existing or tendered for filing. There are no other known broadcast facilities within 315 meters of the shared transmitter site.

The proposed FM Booster will rebroadcast FM Station KLMP, Rapid City, SD Channel 250C1. KLMP also holds a Construction Permit to upgrade to a Class C operation. This CP will not affect the Booster facility. This Channel 250D Booster is expected to operate with no more than 3.9 kW (V) only power. The antenna will use EPA Type 1 elements. The antenna will be constructed as such to house a diplexed operation with two other FM Booster facilities.

The second FM Booster is expected to rebroadcast current outstanding Construction Permit File No. BPED-19970918MI for a NCE operation on Channel 202C, Rapid City, SD. This Channel 202D Booster is expected to operate with no more than 2.3 kW (V) only power.

The third FM Booster is expected to rebroadcast KSLT(FM) on Channel 297D with a maximum effective radiated power (ERP) of 3.9 kW (V) only. The antenna will be a Scala CL-FM three bay antenna mounted 51.8 meters AGL.

The proposed tower site has been used in numerous applications for several different television facilities. The facilities listed below represent the most current license or authorization for each facility. This is believed to be a complete list of all television facilities currently authorized at this location. *In cases where several facilities listed appear to be variations of the same operation, only a single operation has been assumed*.*

Call Letters	Channel/Status	City/State	File Number	Power	COR (AMSL)
KNBN	21 - TV LIC	RAPID CITY SD	BLCT -20011031ABP	500.0kW	1301. m
KKRA-LP	24 N TX LIC	RAPID CITY SD	BLTTL -19980213JB	11.8kW	1221. m
KNBN-LP	27 N TX LIC	RAPID CITY SD	BLTTL -19970801JA	57.6kW	1221. m
KNBN-LP*	44 N TX APP	RAPID CITY SD	BMJPTT-20000830BRY	27.0kW	1280. m
KNBN-LP*	44 N TX CP	RAPID CITY SD	BPTTL -20011102ABP	27.0kW	1280. m

For purposes of this study, a worst case scenario was assumed for each of the above facilities. A maximum permitted aural power of 22% was assumed. In addition, a maximum relative field of 0.300 was assumed for each antenna. Typical television transmission antennas exhibit a relative field of this value or less within the portion of the vertical plane pattern that would apply to an observer within 315 meters of the base of the supporting structure. In some cases where specific antennas are known, this relative field value is much greater than that specified by the manufacturer. Thus, it is believed to represent a good "worst case" value.

The distance of the antenna center of radiation above ground level is the shortest path to an observer on the ground. This distance, minus 2 meters for the height of the observer, was assumed for each television exposure study. 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. 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).

The “Dist to COR” value shown on the all tabulations represents the height of the antenna center of radiation above an observer on the ground who is assumed to be 2 meters in height. Graphs and tabulations of all measurements will be supplied upon request.

<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Limit</u>	<u>% of Limit</u>
KSLT(FM) Proposed Booster	49.23 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	24.62%
CH202D Proposed Booster	29.03 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	14.52%
KLMP(FM) Proposed Booster	49.23 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	24.62%
KNBN BLCT-20011031ABP	65.51 $\mu\text{W}/\text{cm}^2$	343.34 $\mu\text{W}/\text{cm}^2$	19.08%
KKRA-LP BLTTL-19980213JB	4.09 $\mu\text{W}/\text{cm}^2$	355.34 $\mu\text{W}/\text{cm}^2$	1.15%
KNBN-LP BLTTL-19970801JA	19.99 $\mu\text{W}/\text{cm}^2$	367.34 $\mu\text{W}/\text{cm}^2$	5.44%
KNBN-LP BPTTL-20011102ABP	4.75 $\mu\text{W}/\text{cm}^2$	435.34 $\mu\text{W}/\text{cm}^2$	1.09%
		Total % of Limit	90.52%

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.