

EXHIBIT 18.1

RADIOFREQUENCY RADIATION GUIDELINES COMPLIANCE STUDY

This instant application has been evaluated for potential of human exposure to non-ionizing radiofrequency radiation. The guidelines set forth in OET Bulletin No. 65 (Edition 97-01) and the companion Supplement A (Edition 97-01) were used as the standard for this evaluation

The proposed 1320 kHz WILS(AM) operation will operate with a daytime power of 25.0 kW into a two tower array and a nighttime power of 1.9 kW into a four tower array. One tower is common between both arrays. The daytime power of 25.0 kW has been assumed for the common day/night tower and the dedicated daytime power. The nighttime power of 1.9 kW has been assumed for the remaining three nighttime towers. All towers will employ radiating elements 94.6° in electrical length or 0.263λ (wavelengths).

For the common day/night tower and the dedicated daytime tower, table 2 of Supplement A specifies for 0.21-0.4 wavelength AM towers operating on 1320 kHz with a total input power of 50.0 kW or less, the non-ionizing radiation will fall to safe levels at distances of 4 meters (13.1 feet) or more.

For the remaining three nighttime towers, table 2 of Supplement A specifies for 0.21-0.4 wavelength AM towers operating on 1320 kHz with a total input power of 5.0 kW or less, the non-ionizing radiation will fall to safe levels at distances of 2 meters (6.6 feet) or more.

Fences will be built around the base of each tower to achieve this level of protection. Access to areas within the fences will be limited by means of locked gates. In addition to these measures, signs will also be posted warning of the potential for exposure to excessive levels of non-ionizing radiofrequency radiation.

In the event maintenance personnel are required to work within the restricted areas, they will be advised to limit their work in the high RF field areas to specified periods of time appropriate for compliance with the FCC guidelines set forth in OET Bulletin No. 65 (Edition 97-01). 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 radiofrequency radiation subject to the guidelines of OET Bulletin No. 65 (Edition 97-01) at this location.