

## EXHIBIT 22.1

### COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

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The potential for human exposure to non-ionizing radiofrequency radiation at the proposed transmitter site has been evaluated. In addition to the proposed WVGR(FM) CH281B auxiliary operation for Grand Rapids, MI, the transmitter site will be located within 315 meters of two (2) other FM facilities as noted below. There are no other known broadcast facilities within 315 meters of the shared transmitter site.

The proposed WVGR(FM), Grand Rapids, MI, CH281B auxiliary facility will operate on 104.1 MHz with a maximum effective radiated power (ERP) of 19.5 kW circular polarization with an antenna center of radiation mounted 117 meters above ground level (AGL). A two bay Jampro "Crossed V" antenna with elements spaced  $1.0 \lambda$  (wavelength) apart will be employed. Elements consist of EPA type 2 design as defined by FM Model Version 2.10 Beta issued March 22, 1995.

The WVGR(FM), Grand Rapids, MI, CH281B licensed facility is also co-located on the tower, however as the WVGR(FM) auxiliary antenna will only be in operation when the WVGR(FM) main antenna is silent, this contributor may be disregarded.

The WOOD-FM, Grand Rapids, MI, CH289B Construction Permit, File No. BPH-20070329AIQ, is authorized to operate with 265.0 kW of circular polarization with an antenna center of radiation mounted 183 meters above ground level (AGL). Inspection of the Construction Permit indicates the facility will operate with an ERI-LYNX DI-12-SP, 12 bay antenna with elements spaced  $1.0 \lambda$  (wavelength) apart. It should be noted License to Cover BLH-20071129AJD has been accepted for filing covering this outstanding Construction Permit.

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. FM 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).

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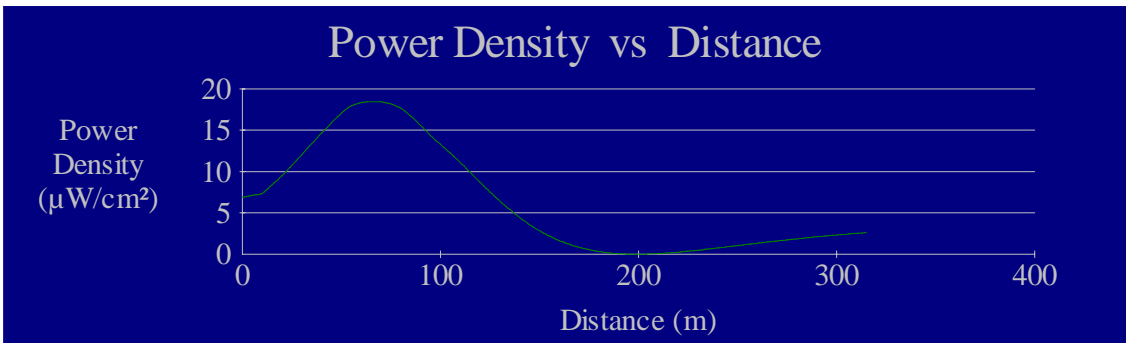
<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Limit</u>	<u>% of Limit</u>
WVGR(FM) Auxiliary	18.479 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	9.24%
WOOD-FM CP	25.151 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	12.58%
		<b>Total:</b>	<b>21.82%</b>

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. In this instance, the relevant set of guidelines are for the “uncontrolled environments”, which are defined as locations where there is exposure that may be incurred by persons of the general public who are unaware of the potential for 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 relevant 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.

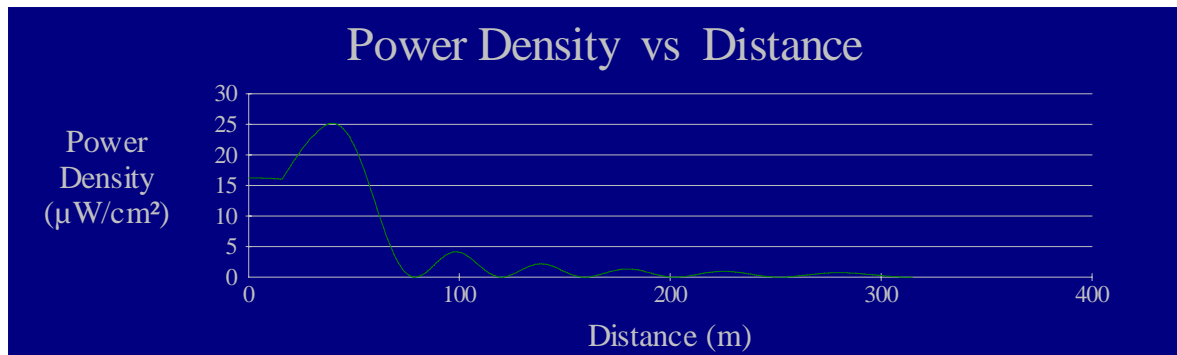
In the event work is required in proximity to the antenna(s) such that the person or persons working in the area will be potentially exposed to fields in excess of the current guidelines, an agreement signed by all broadcast parties at the site will be in effect for the offending transmitter(s) to reduce power, or cease operation during the critical period.

### Proposed WVGR(FM) Auxiliary Operation



The Max Power Density was found to be 18.4785850989707  $\mu\text{W}/\text{cm}^2$  at 65 meters.

### WOOD-FM Construction Permit BPH-20070329AIQ



The Max Power Density was found to be 25.1511340903226  $\mu\text{W}/\text{cm}^2$  at 40 meters.