

## Exhibit 22.1

### COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

The proposed site for KJTA (FM) CH210C2, Flagstaff, AZ, will be located near multiple transmitters. Therefore, the potential for human exposure to non-ionizing radiofrequency radiation has been evaluated with regards to §1.1307(b)(3) concerning the five percent (5%) contribution rule for multiple transmitter sites.

The proposed facility will operate on CH210C2, 89.9 MHz with a maximum effective radiated power (ERP) of 1.0 kW circular polarization. The facility will operate with a two (2) bay "rototiller" antenna mounted 28 meters above ground level (AGL). The spacing for the elements will be  $0.5 \lambda$  (wavelengths). The antenna will employ EPA type 3 elements as defined in FCC program FM Model Version 2.10b.

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). The FM Model software package, available from the FCC, was used to determine the individual contribution of the station. FM radiofrequency radiation levels are 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.

To evaluate the total exposure to non-ionizing radio-frequency radiation with regards to the five percent contribution exclusion rule, it is necessary to establish 5.0% of the maximum permissible limit. Five percent of the  $200 \mu\text{W}/\text{cm}^2$  limit for general population exposure is  $10 \mu\text{W}/\text{cm}^2$ . Therefore if the resulting contribution is less than or equal to  $10 \mu\text{W}/\text{cm}^2$  or 5.0% of the general population limit, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01) and §1.1307(b)(3). Protection of the more restrictive general population (of uncontrolled) limit implies protection of the occupational (or controlled) limit.

Inspection of the graph below indicates the maximum contribution for the general population environment is less than the  $10 \mu\text{W}/\text{cm}^2$  (5.0%) limit as set forth by §1.1307(b)(3), therefore the facility is in compliance with FCC guidelines. §1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where their individual contribution is less than five percent. Since this instant application meets the five percent exclusion, the impact of the proposed facility may be considered independently from other facilities operating at or nearby this site.

In addition to the protection afforded by the proposed antenna height above ground, the facility will be properly marked with signs, and entry to the facility will be 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, the applicant reduce power, or cease operation during the critical period.

