

## Exhibit 35.1

### Compliance with Radiofrequency Radiation Guidelines

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The potential for human exposure to non-ionizing radiofrequency radiation has been evaluated at the proposed transmitter site. This site will house multiple FM and LPTV operations. The standards employed here-in are detailed in OET Bulletin No. 65 (Edition 97-01). There are no other known broadcast facilities within 315 meters of the shared transmitter site which operate with a power greater than 99 watts ERP.

The proposed WTCM-FM (aux) – Traverse City, MI analog FM Station (Facility ID: 34972) operates on CH278C0 (103.5 MHz) with 2.0 kW ERP vertical polarization. The facility broadcasts from an antenna COR mounted 51.8 meters above ground level (AGL). For purposes of this RF Compliance Study, a one bay antenna employing EPA Type 1 elements as defined by *FM Model - Appendix B* issued March 31, 2016 has been assumed. This facility will not operate with HD/IBOC facilities at this time.

The existing WCCW-FM – Traverse City, MI analog FM Station (Facility ID: 171794) operates on CH298C2(107.5 MHz) with 50 kW ERP circular polarization (H&V). The facility broadcasts from an antenna COR mounted 71 meters above ground level (AGL). For purposes of this RF Compliance Study, a (5) bay antenna EPA Type 3 elements as defined by *FM Model - Appendix B* issued March 31, 2016 has been assumed. This facility will not operate with HD/IBOC facilities at this time.

FCC supplied software was used to determine the individual contribution of each FM station. The *FM Model Version 2.1b* software employs the standards as detailed in OET Bulletin No. 65 (Edition 97-01). FM radiofrequency radiation levels have been 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 has been 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. The results of the evaluation for the FM station have been shown at the end of this RF compliance discussion.

To evaluate the total exposure to non-ionizing radiofrequency 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 unity, the exposure is concluded to be within the guidelines of OET Bulletin No. 65 (Edition 97-01). The table that follows provides the same information with respect to those locations defined as an “uncontrolled environment.” This includes locations where there could be exposure to the general public. The total decimal fraction is also shown.

<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Environment Limit</u>	<u>Decimal Fraction of Limit</u>
WTCM-FM(aux) (analog)	25.679 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	0.133
WCCW-FM (analog)	156.135 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	0.780
<b>Total Decimal Fraction:</b>			<b>0.913</b>

Since the Total Decimal Fraction is less than unity for the uncontrolled environment, the operation of the combined transmitting plants is in compliance with the provisions of OET Bulletin No. 65 (Edition 97-01). Protection of the uncontrolled environment implies protection of the controlled environment. There are no other broadcast sources of radiofrequency non-ionizing radiation present at this site.

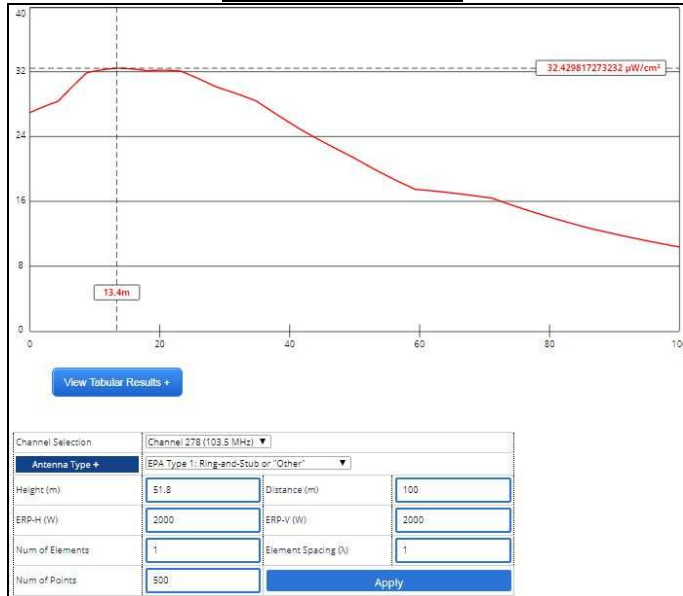
In addition to the protection afforded by the FM antenna heights above ground, the facility is or will be properly marked with signs, and entry to the facility is restricted by means of fencing with locked doors and/or gates if required. Any other means as may be required to protect employees and the general public will be employed. In the event work would be required in proximity to the antenna such that the person or persons working in the area would be potentially exposed to fields in excess of FCC guidelines, an agreement, signed by all broadcast parties at the site, is in effect for the offending transmitter(s) to reduce power, or cease operation during the critical period.

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### PLOT AND TAB OF TOTAL POWER DENSITIES

#### WTCM-FM(aux)



#### WCCW-FM

