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NONIONIZING RADIATION COMPLIANCE

Media-Com Television, Inc.
Akron, OH

The proposed WAOH-LP digital facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. The proposed facilities will operate on Channel 29 with a maximum average effective radiated power of 15 kilowatts using a Bogner B24US directional antenna that will be mounted with its center of radiation located 106 meters above ground level.

Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin No. 65, details the calculation technique for determining the power density levels for a TV broadcast facility. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (15 kilowatts) for the expression $[0.4ERP_V + ERP_A]$ in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Using this equation and assuming, as a worst case, 100% downward radiation yields a maximum predicted power density of 46.3 microwatts/cm² at two meters above ground level. Since the permitted power density for uncontrolled exposure on Channel 29 is 373.3 microwatts/cm², this amounts to only 12.4% of the permitted level for uncontrolled exposure.

The only other non-excluded RF source located on, or in close proximity to, the tower which supports the WAOH-LP antenna, which will continue to be used for the proposed digital operating facilities is WNIR(FM) - Kent, Ohio. As outlined in Exhibit 13 to WNIR's 2004 license renewal application (BRH-20040525AAB), the predicted WNIR power density at two meters is substantially less than 5% of the permitted level for un-

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controlled exposure. As a result, the WNIR facilities are excluded from environmental processing under this standard and need not be considered in conjunction with the proposed WAOH-LP digital facilities in evaluating uncontrolled exposure compliance with this standard.

WAOH-LP, in conjunction with WNIR, will also take appropriate steps to insure that workers that must be on this tower will not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, when work becomes necessary in areas on this tower where the power density levels are in excess of the permitted level for controlled exposure.