

EXHIBIT 22.1

COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

The potential for human exposure to non-ionizing radiofrequency radiation at the proposed transmitter site has been evaluated. In addition to the proposed FM operation of WBLW(FM) on Channel 201C2, the transmitter site will also be shared with one (1) other FM facility and two (2) other TV facilities currently existing or authorized. There are no other known broadcast facilities within 315 meters of the shared transmitter site.

The proposed WBLW(FM) facility will operate on Channel 201C2 with a maximum effective radiated power (ERP) of 5.0 kW vertical only polarization. The antenna will be an FM3V/2-DA two (2) bay antenna mounted 116 meters AGL. The antenna will use EPA Type 1 elements.

WTLI(FM) operates on Channel 207C1 with a maximum effective radiated power (ERP) of 17.0 kW vertical only polarization with an antenna mounted 172 meters AGL. The antenna is an OMB VER-TB four (4) bay model employing an EPA Type 1 elements.

WFUP(TV) operates on analog TV Channel 45-2C with 851 kW of horizontal only power. The antenna is mounted 183 meters above ground level. For purposes of this study, a worst case scenario was assumed for the analog facility. A maximum permitted aural power of 22% was assumed. In addition, a maximum relative field of 0.300 was assumed for the antenna. Typical television transmission antennas exhibit a relative field of this value or less within the portion of the vertical plane pattern that would apply to an observer within 315 meters of the base of the supporting structure. In some cases where specific antennas are known, this assumed relative field value is much greater than that specified by the manufacturer. Thus, it is believed to represent a good "worst case" value.

WFUP-DT will operate on digital TV Channel 59 with 1000 kW of horizontal only power. The antenna is mounted 132 meters above ground level. For purposes of this study, a worst case scenario was assumed for the digital facility. A maximum relative field of 0.300 was assumed for the antenna. Typical digital television transmission antennas exhibit a relative field of this value or less within the portion of the vertical plane pattern that would apply to an observer within 315 meters of the base of the supporting structure. In some cases where specific antennas are known, this assumed relative field value is much greater than that specified by the manufacturer. Thus, it is believed to represent a good "worst case" value.

The distance of the antenna center of radiation above ground level is the shortest path to an observer on the ground. This distance, minus 2 meters for the height of the observer, was assumed for each television exposure study.

There are no other known broadcast facilities within 315 meters of the shared transmitter site.

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. Both FM and TV programs use formulas were originally published in OST Bulletin No. 65, 1985.

The results of the evaluations for all stations are shown in tabular form at the end of this report. The tabulation lists the portion of the tabular output for each station showing the region of maximum radiofrequency radiation. The locations of maximum predicted power density have been highlighted. Graphs of all tabulations will be supplied upon request.

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).

The “Dist to COR” value shown on the all tabulations represents the height of the antenna center of radiation above an observer on the ground who is assumed to be 2 meters in height.

<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Limit</u>	<u>% of Limit</u>
WBLW(FM)	10.690 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	5.35%
WTLI(FM)	18.464 $\mu\text{W}/\text{cm}^2$	200.00 $\mu\text{W}/\text{cm}^2$	9.23%
WFUP(TV) analog	48.426 $\mu\text{W}/\text{cm}^2$	439.34 $\mu\text{W}/\text{cm}^2$	11.02%
WFUP-DT digital	177.922 $\mu\text{W}/\text{cm}^2$	495.34 $\mu\text{W}/\text{cm}^2$	35.92%
		Total % of Limit	66.52%

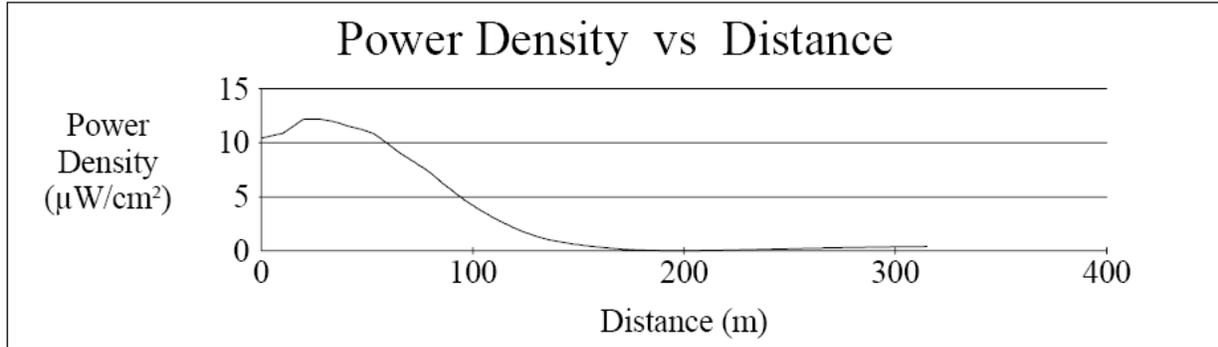
With the implementation of OET Bulletin No. 65 (Edition 97-01) and the accompanying Supplement A (Edition 97-01), the Commission set forth new guidelines for human exposure to radiofrequency radiation that employ a two-tiered system. The more lenient set of guidelines are for the “controlled environments”, which are defined as “locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment, by other cognizant persons, or as the incidental result of transient passage through areas where analysis shows the exposure levels may be above...” the more restrictive guidelines but below the more lenient guidelines. The second, more restrictive, set of guidelines is to be applied to “uncontrolled environments” which are defined as “locations where there is the exposure of individuals who have no knowledge or control of their 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 more stringent 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.

**PLOT OF TOTAL POWER DENSITY
WBLW(FM) proposed – Gaylord, MI
Using a 2-Bay EPA Type 1 Antenna Mounted 116 meters AGL**

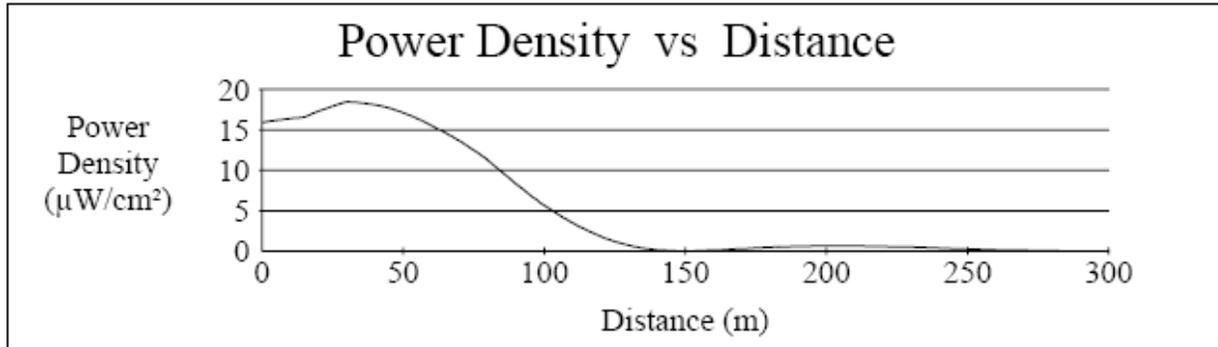


Distance (meters) = 300
Horizontal ERP (W) = 0
Antenna Height (m) = 116
Number of Elements = 2
Y-axis (Linear) = -1

Vertical ERP (W) = 5000
Antenna EPA Type = 1
Element Spacing = 1
X-axis Setup = -1, 300

X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)	X(m)	Y(µW/cm²)
0	10.411	31	12.07	62	9.568	93	5.149	124	1.753
1	10.462	32	12.03	63	9.419	94	5.006	125	1.679
2	10.510	33	11.99	64	9.269	95	4.865	126	1.608
3	10.558	34	11.94	65	9.118	96	4.726	127	1.538
4	10.604	35	11.89	66	8.973	97	4.590	128	1.471
5	10.648	36	11.84	67	8.856	98	4.456	129	1.406
6	10.690	37	11.78	68	8.737	99	4.324	130	1.344
7	10.731	38	11.72	69	8.617	100	4.195	131	1.283
8	10.770	39	11.66	70	8.494	101	4.068	132	1.225
9	10.807	40	11.59	71	8.371	102	3.944	133	1.169
10	10.84	41	11.53	72	8.246	103	3.822	134	1.114
11	10.98	42	11.47	73	8.119	104	3.702	135	1.062
12	11.12	43	11.43	74	7.991	105	3.585	136	1.013
13	11.26	44	11.39	75	7.863	106	3.471	137	.9767
14	11.40	45	11.34	76	7.733	107	3.358	138	.9404
15	11.53	46	11.29	77	7.603	108	3.249	139	.9047
16	11.66	47	11.24	78	7.471	109	3.141	140	.8698
17	11.79	48	11.18	79	7.340	110	3.036	141	.8356
18	11.92	49	11.12	80	7.201	111	2.934	142	.8021
19	12.05	50	11.06	81	7.032	112	2.834	143	.7693
20	12.17	51	10.99	82	6.864	113	2.736	144	.7373
21	12.19	52	10.91	83	6.699	114	2.640	145	.7060
22	12.19	53	10.84	84	6.535	115	2.539	146	.6754
23	12.19	54	10.71	85	6.373	116	2.441	147	.6456
24	12.19	55	10.57	86	6.213	117	2.345	148	.6165
25	12.18	56	10.43	87	6.055	118	2.252	149	.5882
26	12.17	57	10.29	88	5.898	119	2.163	150	.5607
27	12.16	58	10.15	89	5.744	120	2.075		
28	12.14	59	10.00	90	5.592	121	1.991		
29	12.12	60	9.863	91	5.442	122	1.909		
30	12.10	61	9.716	92	5.294	123	1.830		

**PLOT OF TOTAL POWER DENSITY
WTLI(FM) – Bear Creek Township, MI
Using a 4-Bay EPA Type 1 Antenna Mounted 172 meters AGL**



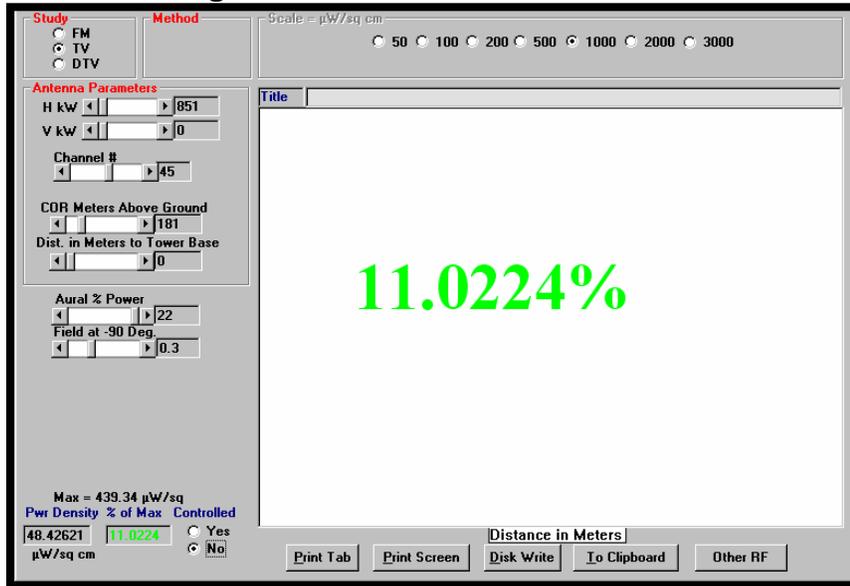
Distance (meters) = 300
Horizontal ERP (W) = 0
Antenna Height (m) = 172
Number of Elements = 4
Y-axis (Linear) = -1

Vertical ERP (W) = 17000
Antenna EPA Type = 1
Element Spacing = 1
X-axis Setup = -1, 300

X(m)	Y(μW/cm²)	X(m)	Y(μW/cm²)	X(m)	Y(μW/cm²)	X(m)	Y(μW/cm²)	X(m)	Y(μW/cm²)
0	15.918	31	18.447	62	15.149	93	7.4835	124	1.292
1	15.970	32	18.425	63	14.980	94	7.2080	125	1.177
2	16.021	33	18.399	64	14.804	95	6.9358	126	1.069
3	16.071	34	18.368	65	14.622	96	6.6671	127	.9675
4	16.120	35	18.333	66	14.434	97	6.4021	128	.8715
5	16.167	36	18.294	67	14.241	98	6.1411	129	.7816
6	16.214	37	18.249	68	14.041	99	5.8976	130	.6974
7	16.259	38	18.200	69	13.836	100	5.659	131	.6190
8	16.303	39	18.146	70	13.626	101	5.424	132	.5462
9	16.346	40	18.086	71	13.410	102	5.193	133	.4788
10	16.387	41	18.021	72	13.189	103	4.965	134	.4166
11	16.427	42	17.951	73	12.963	104	4.741	135	.3595
12	16.466	43	17.875	74	12.733	105	4.522	136	.3074
13	16.503	44	17.794	75	12.498	106	4.306	137	.2600
14	16.538	45	17.707	76	12.260	107	4.095	138	.2173
15	16.585	46	17.608	77	12.017	108	3.889	139	.1789
16	16.728	47	17.498	78	11.771	109	3.688	140	.1448
17	16.868	48	17.382	79	11.521	110	3.491	141	.1148
18	17.007	49	17.260	80	11.239	111	3.300	142	8.880E-02
19	17.144	50	17.132	81	10.946	112	3.113	143	6.644E-02
20	17.278	51	16.998	82	10.653	113	2.932	144	.0476
21	17.411	52	16.859	83	10.359	114	2.757	145	3.224E-02
22	17.541	53	16.714	84	10.066	115	2.587	146	2.005E-02
23	17.668	54	16.562	85	9.7734	116	2.423	147	1.089E-02
24	17.792	55	16.405	86	9.4814	117	2.264	148	4.620E-03
25	17.914	56	16.242	87	9.1904	118	2.111	149	1.044E-03
26	18.032	57	16.074	88	8.9009	119	1.964	150	6.538E-06
27	18.146	58	15.899	89	8.6130	120	1.816		
28	18.257	59	15.719	90	8.3270	121	1.675		
29	18.364	60	15.533	91	8.0433	122	1.541		
30	18.464	61	15.342	92	7.7620	123	1.413		

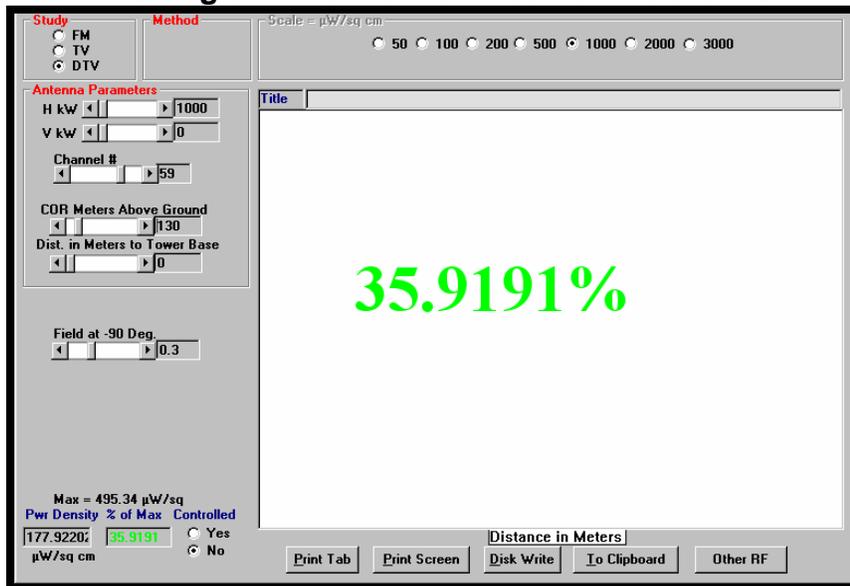
PLOT OF TOTAL POWER DENSITY

**WFUP(TV) analog – Vanderbilt, MI
Using an Antenna Mounted 183 meters AGL**



The “Dist to COR” value shown on the above graph represents the height of the antenna center of radiation above an observer on the ground who is assumed to be 2 meters in height.

**PLOT OF TOTAL POWER DENSITY
WFUP-DT digital – Vanderbilt, MI
Using an Antenna Mounted 132 meters AGL**



The “Dist to COR” value shown on the above graph represents the height of the antenna center of radiation above an observer on the ground who is assumed to be 2 meters in height.