Exhibit 17.1
Compliance with Radiofrequency Radiation Guidelines

This firm was retained to study the potential for human exposure to non-ionizing radiofrequency radiation at the common site of existing station WNYY(AM) – Ithaca, NY and the eight (8) proposed Translator operations of W235BR – Ithaca, NY; W240CB – Ithaca, NY; W242AB – Ithaca, NY; W244CZ – Ithaca, NY; W249CD – Ithaca, NY; W254BF – Ithaca, NY; W262AD – Ithaca, NY and W277BS – Ithaca, NY. There are no other licensed facilities located within 315 meters of the common site.

The WNYY(AM) – Ithaca, NY analog AM facility (BL-19810324AM / BL-19890216AB) operates on a frequency of 1470 kHz with a daytime non-directional power of 5.0 kW and a nighttime directional power of 1.0 kW utilizing a four (4) tower array. The daytime tower is common to the nighttime array. All towers employ vertical radiators of 161.4° or 0.448 λ (wavelengths) for operation on 1470 kHz. Existing fencing has been measured to be no less than 2 meters (6.6 feet) in any direction. For purposes of this RF Study, the WNYY(AM) contribution has been analyzed assuming the maximum daytime power of 5.0 KW at a fencing distance of 2.0 meters without regard for time of day or tower of operation.

The eight (8) remaining FM Translators are all located on the various towers within the WNYY(AM) array. However, for purposes of this RF Study, the sum of all FM Translator powers has been assumed as one common contribution from the lowest Translator antenna Above Ground Level (AGL) height. A worst case one bay EPA type 1 element as defined by FM Model Version 2.10 Beta issued March 22, 1995 has been assumed.

The proposed W235BR – Ithaca, NY analog facility will operate on CH235D (94.9 MHz) with a maximum effective radiated power (ERP) of 0.125 kW circular polarization into a four (4) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 84 meters AGL. W235BR does not operate with any HD/IBOC power at this time.

The proposed W240CB – Ithaca, NY analog facility will operate on CH240D (95.9 MHz) with a maximum effective radiated power (ERP) of 0.250 kW circular polarization into a one (1) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 84 meters AGL. W240CB does not operate with any HD/IBOC power at this time.

The proposed W242AB – Ithaca, NY analog facility will operate on CH242D (96.3 MHz) with a maximum effective radiated power (ERP) of 0.250 kW circular polarization into a one (1) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 80 meters AGL. W242AB does not operate with any HD/IBOC power at this time.

The proposed W244CZ – Ithaca, NY analog facility will operate on CH244D (96.7 MHz) with a maximum effective radiated power (ERP) of 0.250 kW circular polarization into a one (1) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 84 meters AGL. W244CZ does not operate with any HD/IBOC power at this time.

The authorized W249CD – Ithaca, NY analog facility (BPFT-20130919ADD) proposes operation on CH249D (97.7 MHz) with a maximum effective radiated power (ERP) of 0.175 kW circular polarization into a four (4) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 84 meters AGL. W249CD does not operate with any HD/IBOC power at this time.

Exhibit 17.1
Compliance with Radiofrequency Radiation Guidelines

The proposed W254BF – Ithaca, NY analog facility will operate on CH254D (98.7 MHz) with a maximum effective radiated power (ERP) of 0.054 kW circular polarization into a four (4) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 84 meters AGL. W254BF does not operate with any HD/IBOC power at this time.

The proposed W262AD – Ithaca, NY analog facility will operate on CH262D (100.3 MHz) with a maximum effective radiated power (ERP) of 0.250 kW circular polarization into a one (1) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 80 meters AGL. W262AD does not operate with any HD/IBOC power at this time.

The proposed W277BS – Ithaca, NY analog licensed will operate on CH277D (103.3 MHz) with a maximum effective radiated power (ERP) of 0.250 kW circular polarization into a one (1) bay Scala CL-FM(Slant-45) antenna. The proposed antenna will be located 84 meters AGL. W277BS does not operate with any HD/IBOC power at this time.

Therefore, for the combined FM Translator contribution, the sum Analog Translator power of 1.604 kW ERP circular polarization has been assumed as one single contribution from the lowest antenna height of 80 meters AGL. As stated before, a worst case one bay EPA type 1 element as defined by FM Model Version 2.10 Beta issued March 22, 1995 has been assumed.

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. A software package designed for use with AM stations (under the previous OST Bulletin No. 65, October 1985) was used to determine the contribution of this facility to the non-ionizing radiofrequency radiation present at this site. This program bases its calculations on data found in Figures 1, 2, and 3 of Appendix D of OST Bulletin No. 65, October 1985. FM non-ionization 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 which is determined by using measured element data prepared by the E.P.A. 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.

The results of the evaluation for the AM contribution have been shown in both graphical and tabular forms at the end of this report. The tabular form lists the portion of the tabular output for each station, showing the region of maximum non-ionizing radiation. (The maximum values have been indicated by the use of ***highlighted print***.) For the AM contribution, the maximum contribution has been assumed using the daytime power of 5.0 kW in conjunction with the fencing distance of 2.0 meters for the tower. The tabulation of AM data use the units of measurement, V^2/m^2 and A^2/m^2, which were used in the previous standards as set forth in OST Bulletin No. 65, October 1985.

For each tower, inspection of the tabulations will show that the maximum contribution of WNYY(AM) at the 2 meter fencing distance is made by the electric field. At this point, the field has a predicted value of 32,366 V^2/m^2, or 179.9055 V/m, which represents 32.095% of the 560.54 V/m uncontrolled limit.

Exhibit 17.1
Compliance with Radiofrequency Radiation Guidelines

The results of the evaluation for the FM station(s) have been shown at the end of this RF compliance discussion. To ensure complete protection, the maximum FM contribution(s) have been assumed without regard for the AM restricted access fencing distance.

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.

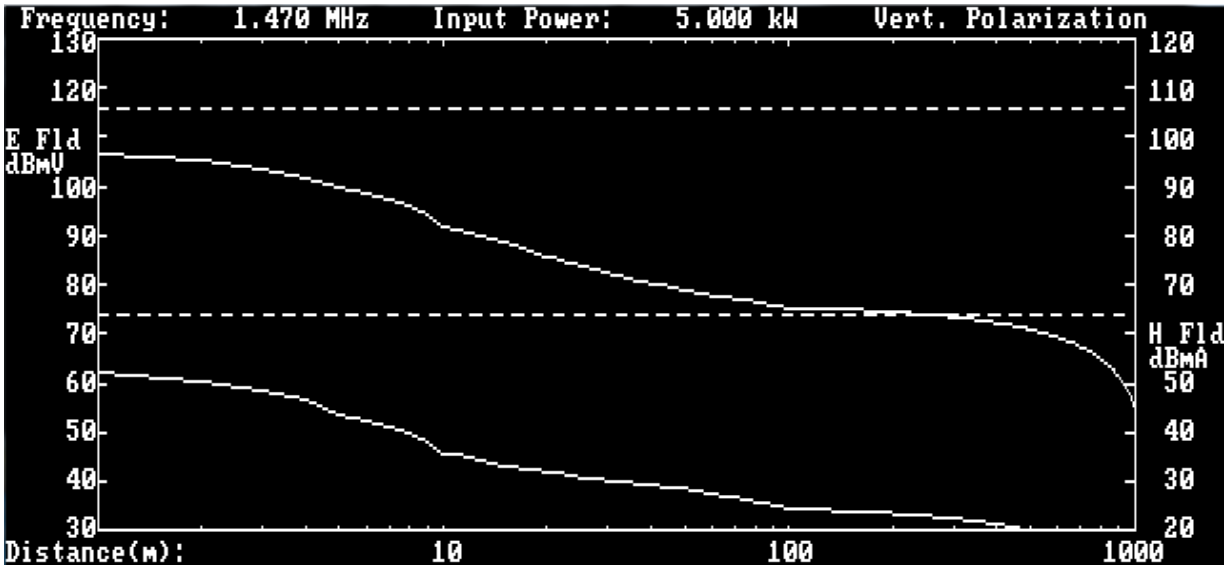
Contributing Station	Maximum Contribution	Uncontrolled Environment Limit	Decimal Fraction of Limit
WNYY(AM) (Analog)	179.9055 V/m	560.54 V/m	0.32095
Combined FM Translator(s)	10.5984 μW/cm²	200 μW/cm²	0.05299
		Total Decimal Fraction:	**0.37394**

Since the Total Decimal Fraction is less than unity for the uncontrolled environment at each tower location, 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 existing AM fencing and the FM 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 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.

PLOT AND TAB OF ELECTRIC AND MAGNETIC FIELD STRENGTHS

WNYY(AM) (Analog) – 1470 kHz – Ithaca, NY



Call: WNYY(AM)
Frequency: 1.470 MHz Antenna Type: AM NON-D
Horizontal Input Power: .000 kW Vertical Input Power: 5.000 kW
Horizontal Element Type Number: 0. Vertical Element Type Number: 1.
Height of observer above plane: 2.0 Meters
Element Data: Vertical Number of elements: 1
Distance from analysis reference point: .0 meters
Azimuth from analysis reference point: N .0 E
Height of tower above reference plane: 161.4 Degrees

Element Number	Distance From Center (wavelengths)	Relative Power	Relative Phase
1.	.00	1.000	.0

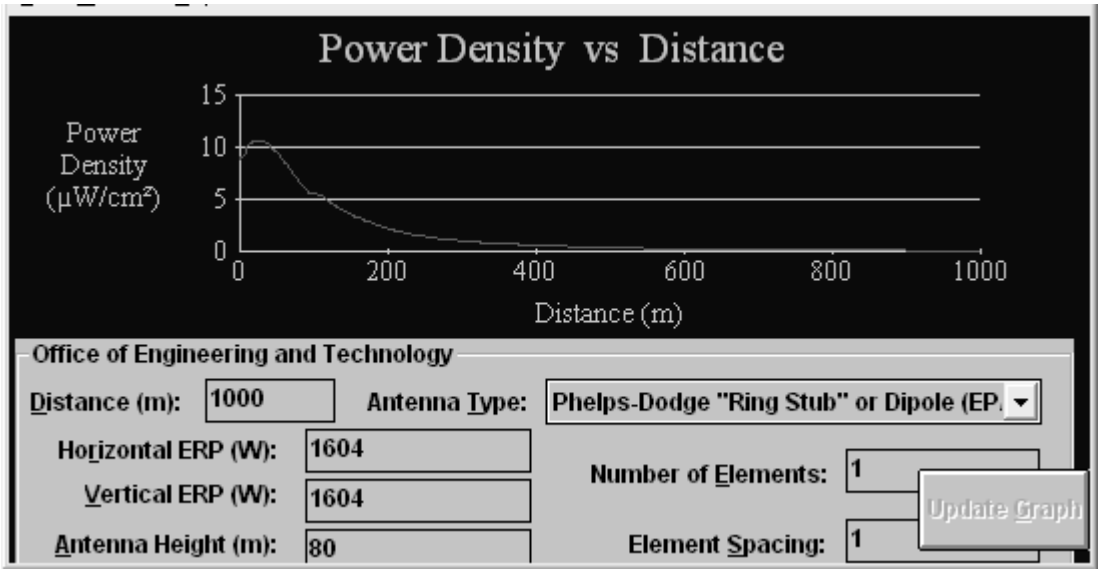
Calculated Results:

Distance (meters)	Horizontal Polarization E2 Field (V2/m2)	Horizontal Polarization H2 Field (A2/m2)	Vertical Polarization E2 Field (V2/m2)	Vertical Polarization H2 Field (A2/m2)	Total Power Density (mW/cm2)
1.00	0.	.0000	43237.	.1589	8.2900
2.00	**0.**	**.0000**	**32366.**	**.1136**	**6.0633**
3.00	0.	.0000	23066.	.0758	4.1822
4.00	0.	.0000	15338.	.0457	2.6468
5.00	0.	.0000	9181.	.0231	1.4570
6.00	0.	.0000	7161.	.0180	1.1343
7.00	0.	.0000	5391.	.0135	.8519
8.00	0.	.0000	3873.	.0096	.6099
9.00	0.	.0000	2605.	.0064	.4083
10.00	0.	.0000	1587.	.0038	.2469
11.00	0.	.0000	1379.	.0035	.2186
12.00	0.	.0000	1186.	.0031	.1919
13.00	0.	.0000	1007.	.0028	.1669
14.00	0.	.0000	843.	.0024	.1436
15.00	0.	.0000	693.	.0021	.1220
16.00	0.	.0000	623.	.0020	.1126
17.00	0.	.0000	557.	.0019	.1035
18.00	0.	.0000	494.	.0018	.0947
19.00	0.	.0000	435.	.0017	.0863
20.00	0.	.0000	380.	.0016	.0782

MUNN–REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

PLOT AND TAB OF TOTAL POWER DENSITY
Combined FM Translator Operation

W235BR – Ithaca, NY (Analog) Proposed Operation
W240CB – Ithaca, NY (Analog) Proposed Operation
W242AB – Ithaca, NY (Analog) Proposed Operation
W244CZ – Ithaca, NY (Analog) Proposed Operation
W249CD – Ithaca, NY (Analog) BPFT-20130919ADD
W254BF – Ithaca, NY (Analog) Proposed Operation
W262AD – Ithaca, NY (Analog) Proposed Operation
W277BS – Ithaca, NY (Analog) Proposed Operation



The Max Power Density was found to be 10.5983749292565 µW/cm² at 22 meters.

Note: Graph resolution is 500 points.