

Exhibit #22

ENVIRONMENTAL PROTECTION ACT

Vermont Public Radio

WOXM

Middlebury, Vermont

December 2009

CH 211A

1.2 kW H & V DA

The applicant proposes the use of an existing unregistered tower built after March 2001. All necessary environmental testing was done and no concerns were identified. A copy of the report is in the WOXM public file. The tower is surrounded by a fence, which is posted with RF warning signs. This is a controlled area.

The proposed antenna will be energized so that it radiates 1.2 kW in both the horizontal and vertical planes, from a height above ground of 45 meters. Based on the formulas expressed in the OET Bulletin, No. 65, August 1997, "Evaluating Compliance with F.C.C. Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", published by the Federal Communication Commission's Office of Science and Engineering, the existing facility produces a worst-case maximum R.F. non-ionization radiation level at a position six feet above the tower base (head level - based on the C.O.R. of 45 meters above ground minus 2 meters) of 43.436 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$). This figure is without regard for the antenna's vertical elevation field value toward the nadir, which will cause a reduction in the predicted "worst case" calculations. 43.436 $\mu\text{W}/\text{cm}^2$ is 4.34 percent of the maximum for this controlled area.

Since "worst case" calculations were used, and since it is well known that the actual RF power density level is considerably reduced at vertical angles toward the nadir the applicant is confident that actual RF contribution of this antenna will be less than is predicted here.

After researching the Mass Media and ULS databases, it was determined that there are two other sources of RF emissions on the tower. Communications antennas KDF445 and KML769 were deemed categorically excluded as both are not greater than 1,000 watts ERP, and the lowest point of the antennas are higher than 10 meters AG.

The proposed FM station will not contribute RF emissions over that which is permissible by Section 1.1307 of the FCC's Rules.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission.

Consequently, it appears that the proposed FM station will be in full compliance with the Commission's human exposure to radiofrequency electromagnetic field rules and regulations.