

Exhibit 16.1

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 CH232D FM Translator operation for Amherst, MA, the transmitter site will also be shared with two (2) other FM facilities. 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 CH232D facility will operate on 94.3 MHz with a maximum effective radiated power (ERP) of 0.25 kW circular polarization. The facility will operate with a fully spaced two element Scala CL-FM antenna array mounted 25 meters above ground level (AGL). EPA Type 1 element was assumed as defined by FM Model Version 2.10 Beta issued March 22, 1995¹.

WFCR(FM), Amherst, MA operates on 88.5 MHz with a maximum effective radiated power (ERP) of 13.0 kW circular polarization with an antenna COR mounted 101 meters AGL. For purposes of this study a worst case one bay EPA Type 1 element was employed as defined from FCC program FM Model Version 2.10 Beta issued March 22, 1995¹.

WAMH(FM), Amherst, MA operates on 89.3 MHz with a maximum effective radiated power (ERP) of 0.150 kW circular polarization with an antenna COR mounted 27 meters AGL. For purposes of this study a worst case one bay EPA Type 1 element was employed as defined from FCC program FM Model Version 2.10 Beta issued March 22, 1995¹.

The results of the evaluations for all stations are shown 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.

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 as set forth in the Rules¹. 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 the Rules¹.

<u>Contributing Station</u>	<u>Maximum Contribution</u>	<u>Uncontrolled Limit</u>	<u>% of Limit</u>
Proposed CH232D	18.7956 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	9.40%
WFCR(FM) (Licensed)	53.3357 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	26.67%
WAMH(FM) (Licensed)	9.6487 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	4.82%
		Total % of Limit	40.89%

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.

¹ Software packages were used to determine the individual contribution of each station evaluating compliance with the FCC guidelines concerning human exposure to radiofrequency radiation as detailed in OET Bulletin No. 65 (Edition 97-01). 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.

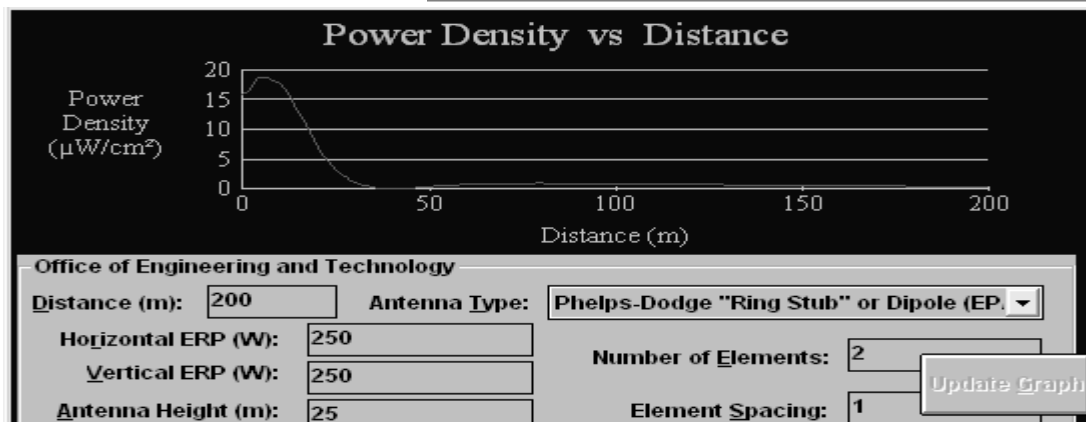
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Proposed CH232D Amherst, MA

The Max Power Density was found to be 18.795565440216 $\mu\text{W}/\text{cm}^2$ at 6 meters.

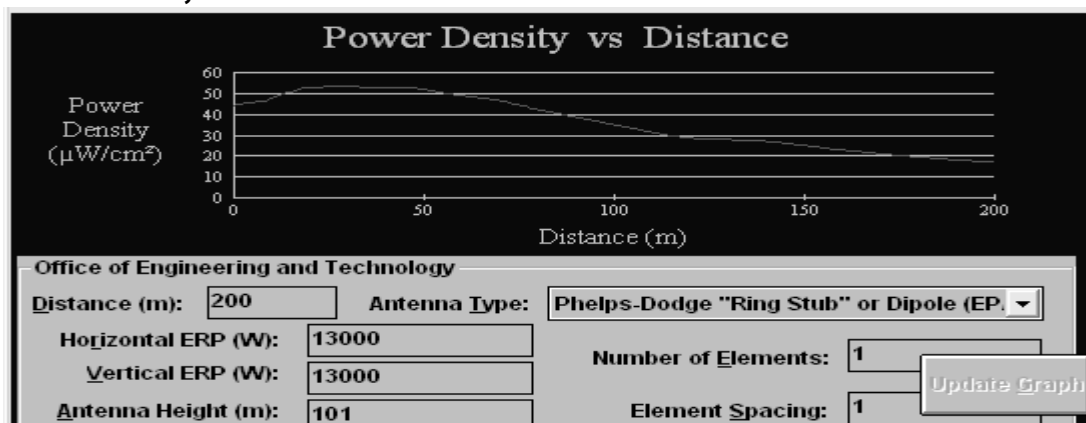
Note: Graph resolution is 200 points.



WFCR(FM) (Lic) Amherst, MA

The Max Power Density was found to be 53.3357374495896 $\mu\text{W}/\text{cm}^2$ at 27 meters.

Note: Graph resolution is 200 points.



WAMH(FM) (Lic) Amherst, MA

The Max Power Density was found to be 9.64868625091117 $\mu\text{W}/\text{cm}^2$ at 7 meters.

Note: Graph resolution is 200 points.

