

## Exhibit #22

### ENVIRONMENTAL PROTECTION ACT

#### Vermont Public Radio

Minor Modification to Construction Permit

WRVT

BPED-20070808ADL

Rutland, Vermont

November 2009

CH 204C2

4.0 kW H & 4.8 V DA

The applicant proposes the use of existing registered tower ASR #1210439, constructed in March 2000. Since this tower was constructed prior to March, 2001, and the applicant proposes no change to the tower structure or profile, it is exempt from further environmental testing.

The proposed antenna will be energized so that it radiates 4.0 kW in the horizontal plane and 4.8 kW in the vertical plane, from a height above ground of 61 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 61 meters above ground minus 2 meters) of 84.460 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.  $84.46 \mu\text{W}/\text{cm}^2$  is 42.23 percent of the maximum for this uncontrolled 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 three other sources of RF emissions on the tower. The television translator W61CE is currently off the air and was excluded. The contributions to the level of RF emission (worst-case) at ground level from each remaining source are:

Call	Ch/Freq	Power (kW)	Height (m)	Level ( $\mu\text{W}/\text{cm}^2$ )	Max ( $\mu\text{W}/\text{cm}^2$ )	Percent (Uncontrolled)
WRVT (New)	204	4.0/4.8	61	80.460	200	42.23
WEXP *	268	0.35 H/V	53	8.991	200	4.50
WEVR-D**	9	15 H	66	4.894	200	2.45
Totals				94.345		47.18
* Worst case, without regard to vertical elevation field at nadir.						
** Assumes use of high-gain VHF antenna with relative field of 0.2 at $-90^\circ$ .						

The proposed FM station will not increase the amount of 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.